

Achieving sustainable development

Question 3: Are there any further strengths, weaknesses, opportunities, or threats that should be considered in developing the new Local Plan?

The consultation does not address NPPF policy TR1 fully, which states that sustainable transport should be considered from the earliest stages of plan-making. Plans should “align land use policies and allocations with wider strategies (such as Local Transport Plans, Local Cycling and Walking Infrastructure Plans and Rights of Way Improvement Plans) and investments in transport to ensure that the potential impacts of development on transport networks are understood and addressed”.

The consultation mentioned the LCWIPs which have been developed for the main settlements in County Durham. It is important to note that very few of the proposed cycling routes in the LCWIPs have been built, and what has been built is not yet remotely functional as a network. There has also not yet been any formalisation of the requirements for routes connecting towns and villages to Durham City.

Policy TR1(1a) sets out the need to engage with local communities to reflect local views and evidence on connectivity when formulating land use policies. The Local Plan should ensure that any land allocation as are clearly linked to local transport improvements and to delivering the active travel network. A particular challenge will be phasing housing land allocations so that settlements around the Leamside line can be developed after that line has reopened, when car dependence can be reduced and a greater yield of housing can be achieved with a lower land take, through the increase in viability which will result from the public transport investment. Developing these settlements prematurely will guarantee increased congestion and worsening air quality in Durham City.

Question 5: We are exploring different ways County Durham could plan for future development. Each possible approach has potential benefits and challenges. What do you think are the main advantages and disadvantages of:

- **focusing growth in the main towns,**
- **dispersed development across smaller towns and villages,**
- **corridor based growth**
- **creating a new settlement or major extensions,**
- **regeneration led development**
- **combining several of these approaches.**
- **Other (please specify)**

The analysis presented is broadly sound.

For the *main towns* option (paragraph 32), *supporting town centre regeneration* is too vague. Too much shopping has gone to out-of-town centres and it will be nigh on impossible to turn the clock back. A different

vision is needed for our town centres and it is not clear how growth will support this. We support the recognition that Green Belts constrain outward development and feel this should remain so.

Question 5a: We'd like to hear your thoughts on the strengths and drawbacks of these options, and any considerations you feel are important when thinking about the future of the county.

While recognising that growth means more than building more houses, we find it hard to respond to this question without any indication of the quanta involved. In that context, we would prioritise the completion of the 12,962 homes in County Durham had planning permission but remained uncompleted last year. It is not clear whether this figure includes student residences, where there are over 1,000 units providing almost 1,500 beds that are in the pipeline. Converting permissions into completions would provide the required numbers in the short term.

Beyond that we favour combining several approaches. We hope that the uncertainties surrounding some of these options will be resolved as the Plan progresses. We favour building on brownfield sites within settlements. We favour regeneration-led development. If the Leamside Line can be progressed we would favour the corridor based growth that offers.

Question 6: Are there any other spatial approaches which could be considered?

In Durham City there are currently over 1,000 units with permission for nearly 1,500 student beds. We note that a number of sites in University ownership have been submitted for education use, which if approved could further increase the number of student beds. The current University position appears to be that it will stay at approximately the same size at it is now. We hope this means more students will be living in PBSAs and colleges, therefore freeing some student HMOs to return to family occupation. The Parish Council supports PBSAs where evidenced demand exists and where it demonstrably assists in reducing pressure on general housing stock/ HMOs.

We also note that increases in PBSA units will count towards the housing numbers required by national targets.

Question 7: How should the Local Plan assess the capacity of different settlements to accommodate additional development? (For example, considering size, services, infrastructure, or existing growth.)

The 2020 County Durham Plan used a Settlement Study to “provide an understanding of the number and range of services available within each of the 230 settlements within County Durham”. A rerun of this exercise would provide a useful evidence base, but the scoring criteria would need to be adjusted to address these shortcomings:

- The score for a settlement was based on whether that settlement included the relevant service, even if it was at the far side of the cluster. This meant that villages such as Sacriston and Shincliffe scored lower than parts of Durham City even though they were nearer to the service being measured.
- The proximity to the service should be measured using travel time by the most appropriate means rather than distance.
- Given that patients are treated in the most appropriate hospital rather than the nearest, the presence of a hospital in a settlement should only have a minor impact on the score.

Where a settlement is missing an essential service an assessment should be made as to whether this could be remedied by, for example, a S106 agreement.

Question 8: Which settlements or areas do you believe are particularly well-placed to accommodate further growth such as new housing, and why?

It is difficult to answer this question without knowing the time frame for the re-opening of the Leamside Line. We do consider that Durham City should not expand any further into the Green Belt. The 2020 County Durham Plan provided for growth in the City and this is now being built out. The 2027 Plan should look elsewhere for growth.

Question 9: How important or unimportant is it that new housing is located where there is good access to employment opportunities, services, and key infrastructure?

Good access to employment opportunities is less important than previously, due to the growth in working from home (where a high-speed broadband connection is essential) and the growth in the numbers of people over retirement age.

According to ONS projections, the number of households in County Durham where the household reference person (previously the head of household) is aged 65 or over is projected to rise from 76,721 to 104,774. In 2022 32% of the households were aged 65+ and by 2047 that is projected to rise to

37%. Over the same time frame the number of households where the reference person is aged 85+ will more than double, from 10,354 to 22,018.

Consequently, where housing is designed or may be used by older people then access to services such as GPs, health centres and shops will be important.

Question 10: How important or unimportant is it that the Local Plan focus development in areas where it can help support regeneration?

This is desirable and the Council may have to incentivise development in these areas.

Question 11: What environmental constraints do you think should have the greatest influence on where new development is located? (e.g., biodiversity, landscape sensitivity, heritage assets, flood risk)

As well as the constraints listed, development must avoid building on the Green Belt and on nature reserves, SSSIs and common land. The sites promoted as a result of the Call for Sites include sufficient land free of these constraints.

Moreover, the City of Durham Parish Council considers that environmental constraints must be integral to the spatial strategy and site-selection process from the outset. The greatest influence should be afforded to those constraints where harm would be irreversible or incapable of satisfactory mitigation; where land already performs important ecological, landscape, heritage or community functions; where development would expose communities to present or future environmental risk; and where development would conflict with the protection of assets of acknowledged international, national or local significance.

The Parish Council therefore considers that particular weight should be afforded to internationally, nationally and locally designated nature conservation sites; Local Nature Reserves; irreplaceable habitats including ancient woodland and ancient and veteran trees; functioning ecological corridors and green infrastructure; Green Belt purposes; the significance and setting of heritage assets, particularly the Durham Castle and Cathedral World Heritage Site; landscape sensitivity; and present and future flood risk.

These constraints should influence where development is located, rather than simply how development is designed after a site has been selected. The fundamental principle should be avoidance before mitigation.

That approach is strongly supported by the December 2025 draft National Planning Policy Framework. The draft Framework states that the purpose of plan-making includes enabling communities to influence development by "directing growth to the most appropriate and sustainable locations" while conserving and enhancing the quality of the built and natural environment. It further states that development

plans should play an active role in guiding development towards sustainable solutions while taking account of local circumstances.

Most importantly, proposed plan-making policy N1: Identifying environmental opportunities and safeguards would require development plans to identify the hierarchy of sites and areas important for landscape, geological and biodiversity value; identify opportunities for habitat restoration and the strengthening of ecological networks; and steer the location of development, including through site allocations, towards land of least environmental value where consistent with the remainder of the Framework. It specifically requires harm to designated nature conservation sites to be avoided and minimised.

The Parish Council considers that this proposed national policy provides an especially important benchmark against which the emerging County Durham spatial strategy and Call for Sites exercise should be considered.

Against that background, the City of Durham Parish Council wishes to place on record its unequivocal and strongest possible opposition to the continued inclusion of Aykley Wood, site reference 287471, as a potential housing development site through the Call for Sites and Local Plan site-assessment process.

The Parish Council formally requests that Durham County Council remove site 287471 from further consideration for housing development with immediate effect.

The Parish Council fully recognises that inclusion within a Call for Sites does not constitute an allocation, establish the principle of housing development or imply that planning permission will ultimately be granted. Nevertheless, the purpose of the present exercise is precisely to identify which sites merit progression through the Local Plan process. Where the Council's own evidence already demonstrates that a site performs substantial and overlapping ecological, Green Belt, recreational, landscape and community functions, the appropriate response is to eliminate that site at an early stage rather than prolong uncertainty over its future.

That is entirely consistent with proposed policy PM9 of the draft NPPF. PM9 would require potential allocation sites to be assessed for their availability, suitability and achievability, with the most appropriate sites then identified having regard to the emerging vision and spatial strategy of the plan. The draft Framework also requires plan-making to be founded upon an up-to-date understanding of the area's needs, opportunities and constraints.

Aykley Wood is a particularly clear example of a site where those constraints should be decisive. Aykley Wood is an established Local Nature Reserve and a well-used area of woodland, wetland, ponds and publicly accessible open space.

The Durham City Neighbourhood Plan expressly identifies Aykley Wood as one of the Local Nature Reserves within the Neighbourhood Plan area. It also forms part of the wider Emerald Network established through Policy G3, whose purpose is to strengthen connections between wildlife sites and green infrastructure across Durham City. The existing statutory development plan therefore already

recognises this land as part of the city's ecological infrastructure rather than as a reserve of land awaiting development.

This becomes particularly significant when considered against the proposed national policy. Draft NPPF policy N6: Areas of particular importance for biodiversity expressly identifies a Local Nature Reserve as a site of local importance. Under the proposed policy, development affecting such a site should only be supported where there would not be a significant adverse effect upon its integrity, or where the benefits of development in that particular location clearly outweigh the impact upon the features which make the site valuable for nature conservation.

That is a decision-making test rather than a direct prohibition on allocating land. Nevertheless, it reinforces the obvious plan-making question: why would the Local Plan deliberately identify an established Local Nature Reserve as a potential housing site when draft policy N1 simultaneously directs plan-makers to steer development towards land of least environmental value?

In the Parish Council's view, those propositions are extremely difficult to reconcile.

Draft policy N2 reinforces the point by requiring development to consider the environmental qualities of land, strengthen ecological networks extending beyond individual sites and conserve and enhance established natural features including trees and hedgerows wherever possible. Crucially, the draft Framework states that where significant biodiversity harm cannot be avoided through locating development on an alternative site with less harmful impacts, adequately mitigated or ultimately compensated, development should be refused.

The clear national policy direction is therefore towards avoidance through alternative site selection. That principle should be applied now, at Local Plan stage, rather than after Aykley Wood has progressed further through the allocation process.

The Parish Council's objection is not dependent solely upon the Local Nature Reserve designation. The adopted County Durham Plan describes Aykley Heads as being characterised by a variety of landscape environments including dense woodland, open grassland, streams and ponds, shaded slopes and open spaces. Importantly, it describes those green spaces as a "key asset" of Aykley Heads and envisages their preservation and enhancement, including habitat creation and continued public access.

The Durham City Neighbourhood Plan similarly distinguishes between land suitable for development and the wider environmentally sensitive landscape of Aykley Heads. Its approach to the Business Park was deliberately focused upon the non-Green Belt part of the site while seeking retention and enhancement of woodland, veteran trees and green spaces.

The Woodland Trust's record of Aykley Wood provides further corroboration of its established environmental and recreational function. It identifies the woodland as approximately 13 hectares, owned by Durham County Council, containing paths

and ponds and connecting with other woodland including ancient woodland at Hopper Wood.

The Council's own material concerning the Aykley Heads Nature Reserve similarly provides important evidence of the value already attributed to this land. That evidence should form part of the environmental baseline against which site 287471 is assessed; it cannot rationally be disregarded merely because the land has subsequently appeared through the Call for Sites process.

The Parish Council recognises that the draft NPPF proposes substantial changes to Green Belt policy. Those reforms do not, however, mean that all Green Belt land should be regarded as potentially developable or that environmental considerations become secondary to housing need.

Proposed policy GB4 expressly establishes a sequence for considering changes to Green Belt boundaries. It requires priority to be given first to previously developed land within the Green Belt, followed by grey belt land that is not previously developed, and only thereafter other Green Belt locations, subject throughout to achieving a sustainable pattern of development.

A Local Nature Reserve comprising woodland, wetland and publicly accessible greenspace is fundamentally different from a previously developed site or an extensive area of hardstanding. Indeed, the adopted County Durham Plan previously considered Green Belt alteration at Aykley Heads in relation to approximately one hectare of hard-surfaced car parking at County Hall. That carefully reasoned approach should not be conflated with development of the adjoining functioning natural environment.

The Parish Council therefore considers that Durham County Council should demonstrate that reasonable opportunities on suitable previously developed land and other less environmentally sensitive locations have been properly considered before entertaining the development of land possessing the characteristics of Aykley Wood.

This is reinforced by the draft NPPF's wider approach to land use. Proposed policy L1 would require plans to make as much use as possible of previously developed land, and the draft states that this matter will be tested robustly at examination. Its national decision-making provisions would also attach substantial weight to benefits arising from remediating degraded or derelict land and making better use of vacant, under-utilised and previously developed land.

Proposed policy GB5: Beneficial uses of Green Belt Land would require development plans to set out how Green Belt land can provide benefits for communities and nature. This specifically includes improving public access to greenspace and explaining how the Green Belt can contribute to priorities for nature recovery identified through Local Nature Recovery Strategies.

Aykley Wood already performs precisely those functions. It is publicly accessible greenspace. It provides woodland and wetland habitat. It contributes to ecological connectivity. It is used for recreation. It sits within the Emerald Network. It contributes to the wider green infrastructure of Durham City.

The logical planning response to draft policy GB5 is therefore not to identify Aykley Wood for housing but to protect, enhance and positively manage it so that it delivers even greater benefits for communities and nature.

This also aligns directly with the Parish Council's responses to Questions 92 and 93, particularly its support for the Durham City Green Corridor, Emerald Network and a coherent landscape-scale Nature Recovery Network.

Even where major housing development is permitted on Green Belt land, the proposed Golden Rules would require the provision or improvement of publicly accessible green space, with new residents able to access good-quality greenspace within a short walk. That greenspace should contribute positively to landscape setting and nature recovery and meet relevant local or national accessibility standards.

There is an obvious contradiction in destroying or substantially diminishing an existing, established and publicly accessible Local Nature Reserve in order to provide housing which would itself generate a requirement for accessible greenspace.

Aykley Wood already provides the very environmental and community infrastructure that national policy increasingly expects new development to create.

Its value should therefore be assessed on the basis of the services it presently provides, not merely by calculating the theoretical number of dwellings which might physically be accommodated within its boundaries.

The County Durham Plan itself recognises views of the World Heritage Site as a major positive characteristic of Aykley Heads and identifies the location as sensitive as a consequence.

The December 2025 draft NPPF substantially reinforces the treatment of World Heritage Sites. Proposed policy HE8 would require development affecting a World Heritage Site to pay particular regard to its Outstanding Universal Value, expressly including the contribution made by its setting. It would also require assessment of potential cumulative effects using, where appropriate, visual impact, natural environment, archaeological and historical evidence.

More generally, the draft Framework describes World Heritage Sites as assets of the highest significance, for which development causing substantial harm should be "wholly exceptional".

The Parish Council is not suggesting, without a detailed heritage assessment, that housing at Aykley Wood would necessarily cause substantial harm to the World Heritage Site. That would require proper evidence. The point at this stage is different: the recognised relationship between Aykley Heads and views towards the World Heritage Site constitutes a material environmental and heritage constraint which should influence whether the site progresses at all.

That constraint must be assessed alongside, rather than separately from, the Local Nature Reserve, Green Belt, landscape and ecological considerations.

There remains the exceptional additional consideration that part of the site comprises registered common land provided as compensatory common land following the 2021 public inquiry concerning deregistration of the former coach park at The Sands.

The Parish Council considers that this carries very substantial public-interest weight. Land provided to compensate the community for the loss of other common land should not subsequently be treated as a development opportunity. Doing so would undermine the purpose of the compensatory arrangement and public confidence in both that process and the Council's stewardship of publicly owned land.

The presence of compensatory common land is therefore another compelling reason why the site should be removed at this early stage rather than carried forward into increasingly detailed assessment.

Taken as a whole, the December 2025 draft NPPF strengthens rather than weakens the Parish Council's objection. It proposes that Local Plans should be based upon a clear understanding of environmental constraints; that potential allocations should be assessed for their suitability; that development should be steered towards land of least environmental value; that biodiversity harm should first be avoided through consideration of alternative locations; that Local Nature Reserves receive express policy protection; that previously developed land should be prioritised when considering Green Belt release; that Green Belt should itself deliver public access and nature recovery; and that the setting and Outstanding Universal Value of World Heritage Sites should receive explicit consideration.

Aykley Wood sits on the wrong side of virtually every one of those considerations. It is not simply undeveloped land. It is a functioning Local Nature Reserve, established woodland and wetland environment, publicly accessible greenspace, part of Durham City's ecological network, Green Belt land, land with recognised relationships to the historic city's landscape setting and, in part, compensatory common land.

The Parish Council fully accepts the requirement to plan positively for the housing needs of County Durham. However, a positive housing strategy is not synonymous with an indiscriminate development strategy. The role of strategic planning is precisely to accommodate necessary growth while directing it away from the places where environmental and community costs would be greatest.

Accordingly, the City of Durham Parish Council formally requests the immediate removal of Aykley Wood (site reference 287471) from the Call for Sites assessment and from any further consideration as a potential housing allocation.

Rather than considering the land for development, the new Local Plan should recognise Aykley Wood as strategic green and ecological infrastructure, protect its Local Nature Reserve and Green Belt functions, secure its positive long-term management, and identify opportunities to strengthen its ecological connections with the wider Emerald Network and Durham City Nature Recovery Network.

Question 12: How important or unimportant is it that growth is focused on locations with good access to sustainable transport and a choice of travel networks?

This is very important. We would welcome the re-opening of the Leamside line at least as far as Ferryhill Station to add to the choice of sustainable transport. Also, more trains should stop at Seaham and Horden stations. There is a half-hourly service from Sunderland to Hartlepool and Middlesbrough but one of the two trains is non-stop. If they all stopped at intermediate stations this would also increase choice.

Question 13: Do you agree or disagree with the proposed approach of setting clear, affordable housing requirements, including a minimum proportion of Social Rent, as part of the Local Plan?

Yes. It appears that the new Prime Minister will announce a programme to build a lot more council houses, so this may be mandated by central government. ONS projections show that the average household size in County Durham will decrease from 2.17 in 2022 to 2.03 in 2047, yet 39% of new houses have four or more bedrooms (source NHBC). So plans should provide for more smaller dwellings as these will be more affordable.

Question 14: The Local Plan will set higher affordable housing requirements for major development on land released from the Green Belt (including Grey Belt), in line with national policy and the "Golden Rules". What should the approach be?

Do not release land from Green Belt.

Question 14a: Please provide reasons for your answer (including any evidence on viability and deliverability).

A survey of the sites put forward under the Call for Sites shows that there are more than enough sites outside the Green Belt to meet demand.

Question 15: Which types of infrastructure do you think the Local Plan should prioritise through developer contributions? (e.g. education, healthcare, active travel, utilities, green/blue infrastructure)?

This should flow from the answer to Question 7. Each settlement will be different and developer contributions should be used to make up any shortfall identified for that settlement.

Question 16: Do you agree or disagree that the Local Plan should set out a clear approach to commuted sums, including when off-

site affordable housing or (subject to national policy) cash-in-lieu on medium sites may be appropriate?

Yes, agree.

Question 17: Do you agree or disagree that the Local Plan should use standard national viability assumptions (when available), and only allow site-specific viability assessments in exceptional cases?

We do not have enough experience to answer this question.

Question 17a: Please explain your answer (optional)

Meeting the challenge of climate change

Question 18: Do you think any further policies are needed to address climate change beyond what is included in national policy or to be addressed elsewhere in the Local Plan?

Yes.

Question 18a: If yes, which policies do you consider are needed?

The Local Plan offers an opportunity to go beyond national climate policy which is required as this year's heat waves and the current devastating wildfires across Europe once more demonstrate vividly. The scale and urgency of the climate emergency means that the transition to a zero-carbon society as quickly as possible must remain a national priority. Local planning authorities can play a leading role in achieving this.

Accordingly, the Local Plan should place climate mitigation and adaptation at its core, requiring the highest practicable standards of energy efficiency, supporting renewable and community energy generation, reducing the need to travel by car, promoting active and public transport, and ensuring all development contributes positively to carbon reduction, climate resilience and ecological recovery.

A particularly important additional policy requirement concerns electric vehicle charging for residents without in-curtilage parking. The transition to electric vehicles must not be designed solely around suburban properties with private driveways. A substantial proportion of County Durham's existing housing stock, particularly within Durham City and its historic neighbourhoods, comprises terraced properties, flats and other dwellings where residents park on-street and have no practical means of installing a conventional domestic charge point.

The Local Plan should therefore positively facilitate safe, accessible and appropriately designed EV charging infrastructure for households without in-

curtilage parking. This should include support, where technically and environmentally appropriate, for on-street charging points, charging integrated into street furniture and other emerging technologies that enable cables or connections to be provided safely without obstructing pavements or creating hazards for pedestrians and disabled people. Wherever possible, the power drawn from an EV charger should be paid for via the owner's domestic electricity bill, as this is much cheaper than the alternatives and so would encourage EV take-up. New development involving streets or communal parking should incorporate charging infrastructure from the outset rather than requiring expensive retrofitting later.

Delivering a sufficient supply of homes

**Question 19: Which housing issues affect you or your area the most?
(Please tick all that apply)**

- ☒ Lack of affordable housing (including social rent)
- ☒ Not enough homes of the right size (e.g. family homes, smaller homes)
- ☒ Not enough specialist housing (e.g. for older people or people with disabilities)
- ☒ Other (please specify)

Question 19a: How do you think the Local Plan should respond to these issues?

The Local Plan should respond to identified housing needs by focusing on delivering the right homes in the right places, rather than simply increasing overall housing numbers. This should include a particular focus on maintaining mixed and balanced communities and providing an appropriate mix of family housing, specialist accommodation and affordable housing.

In Durham City, affordability continues to be influenced by the particular characteristics of the City, including high market demand, the influence of the student housing market, heritage constraints and the premium attached to living in a historic cathedral city. These factors mean that the delivery of housing alone will not necessarily address affordability and the Local Plan should continue to support appropriate affordable housing provision alongside policies that maintain a balanced housing market.

The important contribution made by Durham University and its students to the local economy and community are fully recognised, however, future planning policies should ensure the housing needs of all sections of the community are met

without further eroding the stock of housing available for permanent residents or undermining community cohesion.

Durham City has already made a substantial contribution to meeting housing needs through strategic housing allocations and existing planning permissions. The priority for the new Local Plan should therefore be to maximise the delivery of existing strategic allocations and extant planning permissions before identifying further significant housing allocations in and around Durham City. All new housing should be supported by appropriate infrastructure and be of a high standard of design.

Policy needed to prevent developers going for just large houses – cross reference with Policy 19 and 74a.

Question 20: How should the Local Plan respond to the need for specialist housing, such as supported accommodation, extra care housing, accessible homes, or children's homes?

The Local Plan should ensure that specialist housing provision is based on robust and up-to-date evidence of identified need and responds to the changing demographic profile of the County. Particular regard should be given to the provision of housing for older people, including opportunities to support independent living, together with accessible and adaptable homes that enable people to remain in their communities as their needs change.

The Local Plan should also recognise the importance of maintaining mixed and balanced communities by ensuring that the housing needs of all sections of the community—including families, young people, older people and students—are appropriately planned for. Specialist housing should be located where residents have good access to services, public transport, healthcare and community facilities.

Question 21: Do you agree or disagree that the Local Plan should identify sites, or include specific requirements within sites, to deliver particular types of housing (such as housing for older people or self-build homes)?

Strongly agree

Question 21a: Please explain your answer (optional)

The Parish Council strongly agrees that the Local Plan should make appropriate provision for different types of housing where there is an identified need. This may be through the allocation of suitable sites or by requiring larger housing developments to provide for specific housing needs as part of mixed and balanced communities.

The Local Plan should ensure that appropriate provision is made for older people, accessible and adaptable homes, self-build and custom-build housing where there is evidence of demand, and other specialist housing needs identified through

robust evidence. Such development should be located in sustainable locations with good access to services, public transport, healthcare and community facilities, enabling people to live independently and remain within their communities.

Question 22: The draft National Planning Policy Framework (NPPF) encourages local plans to consider whether larger strategic or mixed-use sites can play an important role in meeting housing needs across an area. Do you agree or disagree that the Local Plan should identify larger strategic or mixed-use sites to help meet housing needs across the plan area?

Agree

Question 22a: Please tell us why you feel this way, including any opportunities or challenges you think there may be in delivering housing as part of larger developments.

The Parish Council agrees that larger strategic and mixed-use sites have an important role in meeting housing needs where they are sustainably located and supported by the necessary infrastructure. Such sites can provide opportunities to deliver affordable housing, community facilities, green infrastructure, schools, transport improvements and other infrastructure that may be more difficult to secure through smaller developments.

However, strategic growth should be distributed appropriately across County Durham and informed by robust evidence, environmental capacity, Green Belt purposes, infrastructure provision and the ability of places to accommodate development sustainably. Durham City has already made a substantial contribution to meeting County housing needs through the release of Green Belt land for strategic allocations. In determining the scale of any additional allocations, the Local Plan should take full account of this existing pipeline of committed development when considering future needs. The priority should therefore be the delivery of these commitments before considering the need for additional strategic allocations in and around the City.

The Local Plan should ensure that the scale and location of future strategic sites support sustainable patterns of development, conserve the historic environment and landscape setting of Durham City, and avoid unnecessary harm to the Green Belt, World Heritage Site or other nationally and locally important environmental assets.

Question 23: Do you agree or disagree that the Local Plan should provide more smaller sites for housing, including: at least 10% of homes on sites of 1 hectare or less, and a further 10% on sites between 1 and 2.5 hectares?

Agree

Question 23a: Please explain your answer.

The Parish Council agrees that the Local Plan should provide a range of site sizes to support a flexible and deliverable housing land supply. Smaller sites can often be delivered more quickly, provide opportunities for small and medium-sized builders, and may help meet local housing needs where they are appropriately located.

However, smaller sites should complement rather than replace larger strategic sites. The Local Plan should seek an appropriate balance of site sizes, with all allocations informed by sustainability, infrastructure capacity, environmental constraints and the character of the surrounding area.

Within Durham City, opportunities for additional small housing sites are limited by the historic urban form, heritage assets, Green Belt and other environmental constraints. The emphasis should therefore be on the effective delivery of existing allocations and planning permissions, together with the redevelopment of suitable previously developed land where available, rather than identifying numerous additional housing sites.

Question 24: How should the Local Plan work with landowners, developers, and infrastructure providers to ensure that allocated sites can be delivered in a timely and coordinated way? (Please tick all that apply)

- ☒ Set clear delivery expectations and timescales
- ☒ Work closely with infrastructure providers early in the planning process
- ☒ Use planning conditions or legal agreements to secure delivery
- ☒ Regularly monitor progress and intervene if sites stall
- ☒ Prioritise sites that are ready to deliver (e.g. available and viable)

Question 25: What issues should the Local Plan address to meet different housing needs across the county? (Please tick all that apply)

- ☒ Need for more affordable housing (including social rent)
- ☒ Rural housing needs
- ☒ Regenerating existing towns and communities
- ☒ Pressure on infrastructure (e.g. roads, schools, healthcare)
- ☒ Supporting the role of towns and villages
- ☒ Providing a mix of housing types and sizes

Question 25a: Please tell us more about your views, including which issues you think are most important and why

The Local Plan should seek to meet a wide range of housing needs across County Durham through a balanced spatial strategy that delivers the right homes in the right places. This should include affordable housing, family housing, specialist accommodation and accessible homes, alongside appropriate infrastructure to support new development.

The Plan should recognise that housing challenges vary across the County. In Durham City, affordability is influenced by high demand, the student housing market and the premium associated with living in a historic city. In rural areas, the priority may be maintaining sustainable communities through the provision of appropriate local housing. Regeneration should continue to play an important role in supporting existing towns and communities.

Future housing growth should be supported by timely infrastructure provision, maintain mixed and balanced communities, and make effective use of existing housing commitments before significant additional allocations are identified.

Question 26: What approach should the Local Plan take to Houses in Multiple Occupation? (Please tick all that apply)

- ☒ Limit the concentration of HMOs in an area (e.g. through thresholds or distance rules)
- ☒ Prevent properties being 'sandwiched' between HMOs and/or a non-residential uses
- ☒ Require high standards of design and living conditions
- ☒ Require management plans to reduce impacts on neighbours
- ☒ Other (please specify)

Question 26a: Please tell us more about your views on HMO policy, including any parts of current policies that should be kept or changed.

The Parish Council supports the continued use of planning policy to manage HMOs in order to maintain mixed and balanced communities, protect family housing and ensure a high standard of residential amenity. It is considered that the Interim HMO Policy, as amended following consultation, provides a stronger and more comprehensive policy framework than the existing Policy 16 and should form the basis of the replacement HMO policy in the new County Durham Plan. The Interim Policy has been significantly strengthened through the consultation process, including changes reflecting representations made by the Parish Council, and now provides a robust and evidence-based approach to managing HMO development.

The continued use of Article 4 Directions where justified by robust evidence are also supported, but they simply ensure that proposals for HMOs are subject to planning control; it is the Local Plan policy that provides the framework against which planning applications are assessed. The review of the County Durham Plan therefore provides an opportunity to establish a single, consistent and robust policy approach to HMOs across the County, with Article 4 Directions continuing to apply in those areas where additional planning control is necessary.

The replacement policy should therefore incorporate the key provisions of the Interim HMO Policy, including:

- retention of the established 10% threshold for HMO concentrations;
- additional street-level clustering and anti-'sandwiching' criteria;
- management plans to minimise impacts on neighbouring residents;
- enhanced standards of accommodation and residential amenity for HMO occupants; and
- the use of a comprehensive range of evidence to identify existing HMOs, including planning permissions, licensing data, Council Tax information and other relevant datasets, rather than relying solely on student Council Tax exemption data.

The Parish Council considers that adopting this approach would provide a consistent, effective and evidence-based planning framework for the management of HMOs throughout County Durham. It would also ensure that the improved standards and assessment criteria developed through the Interim HMO Policy are applied within the Durham City Article 4 areas, helping to protect mixed and balanced communities whilst recognising the important role that well-managed HMOs play in meeting housing needs.

Furthermore, the Parish Council considers that the replacement HMO policy must also address an emerging means by which the objectives of HMO policy can potentially be circumvented through the subdivision of existing Class C3 family dwellings. In our own parish, we have seen this in several instances where developers are seeking to get round the specific policy test and threshold set out under Policy 16.3 (e.g. DM/25/03505/FPA, DM/24/02174/FPA, DM/23/00099/FPA, DM/23/02236/FPA and DM/21/04160/FPA).

The purpose of HMO policy is not simply to regulate the technical change of use from Class C3 to Class C4. Its underlying planning objective is to maintain mixed and balanced communities, protect residential amenity and prevent the continuing

erosion of the stock of conventional family housing in areas already experiencing high concentrations of student accommodation. This objective is expressly recognised in the supporting text to existing Policy 16, which states that the Council's approach is to seek to maintain and create sustainable, inclusive and mixed communities in Durham City. The Plan further recognises that concentrations of student accommodation amongst the general housing stock can change the overall character of an area and adversely affect residential amenity.

The new Local Plan should therefore contain an explicit policy addressing proposals for the subdivision of an existing Class C3 dwelling into two or more Class C3 dwellings where this would result in the loss of a dwelling suitable for continued occupation as a family home, particularly within areas covered by an Article 4 Direction or areas already experiencing significant concentrations of HMOs or student accommodation.

The Parish Council is concerned that subdivision can otherwise provide a route by which the underlying objectives of HMO policy are frustrated. For example, a large Class C3 family dwelling which could not acceptably be converted directly to an HMO because the relevant HMO concentration threshold has already been exceeded may first be subdivided into two smaller Class C3 units. This can materially alter the planning circumstances of the property and potentially facilitate subsequent changes in occupation or use which would not have been acceptable had the original family dwelling remained intact. The Local Plan should be drafted so that planning policy is concerned with the substance and cumulative planning consequences of development rather than simply the sequence of changes of use through which they occur.

The Parish Council therefore considers that proposals involving the subdivision of existing family dwellings should be required to demonstrate that they would not undermine the objective of maintaining or restoring a mixed and balanced community; would not result in the unjustified loss of family housing for which there is an identified local need; would not exacerbate an existing concentration of HMOs, student accommodation or other forms of transient accommodation; and would provide satisfactory accommodation and residential amenity for future occupiers.

Particular scrutiny should apply within Durham City's Article 4 areas. Where the HMO threshold has already been reached or exceeded, there should be a presumption against subdivision where the proposal would facilitate the incremental loss of conventional family housing or would reasonably be capable of undermining the operation or purpose of the HMO policy.

This is entirely consistent with the existing County Durham Plan's recognition that the cumulative impact of HMOs can alter the character of residential areas and that the objective in areas with high concentrations should be to make those communities more mixed, rather than permitting further incremental erosion of their conventional housing stock.

Question 27: Do you agree or disagree that the Local Plan should allow more Purpose-Built Student Accommodation (PBSA) where there is evidence of need?

Yes

Question 27a: What factors should be considered when deciding if new student accommodation is suitable? (Please tick all that apply)

- ☒ Evidence of need for the type of student accommodation proposed
- ☒ Location (e.g. close to universities or town centre)
- ☒ Impact on local communities
- ☒ Impact on housing availability (including HMOs)
- ☒ Design and quality of the development
- ☒ Scale and concentration in the area
- ☒ Availability of infrastructure and services
- ☒ Transport and accessibility
- ☒ Other (please specify)

Question 28: How should the Local Plan make sure there are enough suitable sites for Gypsies, Roma and Travellers and Travelling Showpeople?

The Local Plan should ensure that sufficient sites are identified to meet the objectively assessed accommodation needs of Gypsies, Roma, Travellers and Travelling Showpeople, based on robust and up-to-date evidence.

Site selection should follow the same principles that apply to other forms of development, ensuring that sites are in sustainable locations with appropriate access to services, education, healthcare and public transport where appropriate, whilst taking account of environmental, landscape and heritage constraints.

The Local Plan should seek to achieve an appropriate distribution of sites across County Durham, ensuring that identified needs are met whilst respecting the character of local communities and providing suitable living conditions for both future occupiers and neighbouring residents.

Building a strong, effective economy

Question 29: Which types of locations should be prioritised for new employment sites in County Durham to support economic growth and access to jobs? (Please tick all that apply)

- ☒ Main towns
- ☐ Smaller towns and villages
- ☒ Along major road corridors
- ☒ Near rail stations or public transport hubs
- ☒ Existing industrial or business areas
- ☒ Regeneration areas
- ☐ Rural locations
- ☐ Other (please specify)

Question 29a: Please tell us where and why:

The Parish Council considers Aykley Heads and the emerging Durham Innovation District to be a strategic economic priority of the highest importance. The Local Plan should provide an unequivocal planning framework for its successful delivery as a high-quality employment and innovation location.

This is supported by a longstanding evidence base. The Economic Review identifies a shortage of high-quality office accommodation in and around Durham City as a constraint upon growth in financial and professional services and identifies Aykley Heads, close to Durham railway station, as an opportunity to address this weakness and attract inward investment. The Durham City economy evidence similarly identifies Aykley Heads as a prestige strategic employment location and recognises opportunities for university-related research, high-technology businesses and innovation incubators.

That case has subsequently become substantially stronger. The North East Combined Authority announced £27 million in March 2026 to unlock the Aykley Heads site, with the proposed Durham Mayoral Development Zone intended to align investment in innovation, culture, connectivity, housing and placemaking and facilitate high-tech workspace and thousands of quality jobs. The new Local Plan must reflect this significant change in circumstances.

The Parish Council nevertheless considers that economic development in Durham should not be interpreted as synonymous with development at Aykley Heads. The city centre itself is an employment location and should be planned positively as one. Office, professional, digital, creative, cultural, hospitality, retail and other

appropriate employment should be encouraged within the centre, including through conversion and reuse of vacant and underused buildings and upper floors. The Durham City Neighbourhood Plan evidence already supports sympathetic conversion and reuse of redundant upper floors for office and other appropriate town-centre uses.

Improving physical connections within the City would allow investment at Aykley Heads to reinforce rather than compete with the city centre.

Question 30: To what extent should the Local Plan allow other types of development on employment land (for example, to support regeneration or bring forward unused sites)?

- ☐ Allow this in most cases
- ☒ Allow this in some cases
- ☐ Only allow this in exceptional circumstances
- ☐ Not allow this
- ☐ Other (please specify)

Question 30a: What safeguards are needed to make sure enough land is kept for jobs and businesses? (Please tick all that apply)

- ☒ Only allow changes where there is no demand for employment use
- ☒ Protect key employment sites and areas
- ☒ Require evidence before allowing alternative uses
- ☒ Limit the amount of employment land that can change use
- ☒ Prioritise keeping land for key sectors (e.g. industry, logistics)
- ☐ Other (please specify)

Question 31: Do you think the Local Plan should allocate some employment sites for specific uses (for example advanced manufacturing or large-scale facilities), or take a more flexible approach so sites can adapt to different types of jobs?

- ☐ Allocate sites for specific uses
- ☐ Take a more flexible approach

- ☒ Use a mix of both approaches

Question 31: Please tell us more about your views

A mixed approach offers the greatest economic resilience. Certain strategic sites should be protected for sectors requiring particular infrastructure, scale, environmental conditions or clusters of related activity. Elsewhere, flexibility should allow the market to respond to technological change and new business models without repeatedly requiring changes to the development plan.

For Durham City, the Local Plan should recognise its particular comparative advantages in **knowledge-intensive activity, professional and financial services, research and innovation, digital businesses, creative and cultural industries, university spin-outs and high-value office employment.**

The relationship with Durham University is particularly significant. Its Economic Impact Assessment estimated that in 2020/21 the University generated £489 million GVA and supported 8,170 jobs in County Durham. University spin-outs and start-ups were estimated separately to generate £9 million GVA and support approximately 380 County Durham jobs.

The economic opportunity is therefore not merely to accommodate the University as a large existing employer. It is to build an ecosystem in which research, graduates and entrepreneurship generate more private-sector businesses and employment. Appropriate incubator, grow-on, laboratory, flexible office and collaborative workspace should consequently be planned for. The successful relationship between Durham University and NETPark demonstrates what university-linked innovation can achieve.

Question 32: Which types of jobs and industries should County Durham plan for in the future? (Please tick all that apply)

- ☒ Advanced manufacturing
- ☒ Green and low-carbon industries
- ☒ Digital and technology industries
- ☒ Logistics and distribution
- ☒ Healthcare and life sciences
- ☒ Creative industries
- ☒ Tourism and visitor economy
- ☒ Construction and related trades

☒ Rural and land-based industries

☐ Other (please specify)

Question 32a: How should the Local Plan support these industries when allocating employment land?

Employment allocation should begin with an understanding of what different industries actually require. Advanced manufacturing and logistics generally require larger sites and excellent strategic highway access. Research, technology and life sciences can benefit from clustering, specialist premises and links to universities and research institutions. Creative, digital and professional businesses can often thrive within city and town centres where employees have access to public transport, amenities, networking opportunities and cultural facilities.

For Durham City, there should therefore be a deliberate strategy to increase high-productivity private-sector employment and capture more of the economic benefits generated by Durham University. The City's concentration of skilled people, university research, railway connectivity, heritage and cultural assets gives it an economic proposition which differs from the large industrial and logistics sites elsewhere in County Durham.

The Local Plan should also encourage flexible premises at different stages of the business lifecycle. Supporting a start-up is of limited long-term benefit if that business subsequently has to leave County Durham because suitable grow-on premises are unavailable and Atom Banks' move to Newcastle from the Rivergreen Centre site is a prime example of this.

Employment development should furthermore be integrated with skills, transport, housing and place-making. Creating jobs which local people cannot conveniently reach, or high-value businesses which cannot recruit the skills they require, will not achieve inclusive growth.

Question 33: What opportunities and challenges should the Local Plan consider for the future of the visitor economy? (Please tick all that apply)

☒ Developing new attractions

☒ Supporting visitor accommodation (e.g. hotels, holiday lets)

☒ Improving town and city centres

☒ Supporting rural tourism

- ☒ Supporting coastal tourism
- ☒ Protecting the natural environment
- ☒ Improving transport and access
- ☒ Impact on local communities
- ☒ Supporting local businesses and jobs
- ☐ Other (please specify)

Question 33a: Please tell us more about the opportunities or challenges you think are most important:

The Parish Council considers that future visitor-economy policy should focus increasingly on value rather than volume. Durham already attracts substantial numbers of visitors; the greater economic opportunity is to encourage people to stay longer, spend more during their visit, return more frequently and stay overnight. Success should therefore be measured not simply by visitor numbers, but by indicators such as dwell time, visitor spend, overnight stays, repeat visits and the proportion of expenditure retained by local independent businesses.

The World Heritage Site is the City's principal draw, but the visitor experience should not begin and end at the Cathedral and Castle. The Local Plan should promote Durham City itself as the attraction, encouraging visitors arriving by rail or coach to explore North Road, the Market Place, independent shops and cafés, the riverside, cultural venues, events and the evening economy (and preferably stay overnight). Every additional hour spent in the city creates further opportunities for spending with local businesses, supporting jobs and strengthening the wider economy.

There is evidence of substantial untapped potential. The Durham Destination Management Plan reports that only 9% of County Durham's visitors stayed overnight using its 2021 evidence and identifies improving accommodation as critical. More significantly for the Parish Council, it states that Durham City's retail experience does not match comparable historic cities such as Bath, York and Oxford and notes that early evening closure of shops and cafés can make parts of the city feel quiet. It concludes that supporting investment, particularly in Durham city centre, is critical.

The University should also be recognised as part of the visitor economy. It operates attractions and contributes to the World Heritage Site and attracts visitors through graduations, open days and events. Its assessment specifically identifies its contribution to local restaurants, cafés, cultural activity and tourism.

The Local Plan should therefore facilitate high-quality hotels and visitor accommodation in sustainable locations, cultural and leisure attractions, food and drink businesses, events infrastructure and an attractive public realm. It should encourage routes that draw visitors from the railway station through North Road

and the commercial centre towards the World Heritage Site rather than allowing visitors to bypass significant parts of the high street.

Public realm, signage and walking routes should be designed to encourage visitors to move naturally through the city centre rather than travelling directly between transport hubs and the World Heritage Site. A successful visitor economy should disperse activity across the city centre so that economic benefits are shared more widely.

Question 34: How should the Local Plan support high-quality visitor accommodation and sustainable tourism while protecting the countryside and sensitive locations? (Please tick all that apply)

- ☒ Require high-quality design for tourism development
- ☒ Protect landscapes, wildlife, and natural habitats
- ☒ Limit development in sensitive or protected areas
- ☒ Support sustainable and low-impact tourism
- ☒ Encourage the reuse of existing buildings
- ☒ Ensure good access by sustainable transport (walking, cycling, public transport)
- ☒ Manage impacts on local communities (e.g. noise, traffic)
- ☒ Support rural tourism where it benefits local areas
- ☐ Other (please specify)

Question 35: Do you agree or disagree that the Local Plan should include a policy to prevent the loss of housing to tourist accommodation where this would affect local housing needs?

- ☒ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 36: Do you agree or disagree that the Local Plan should include a policy to prevent tourist accommodation from being changed into

permanent housing where this would lead to a loss of viable tourist accommodation?

- ☐ Strongly agree
- ☐ Agree
- ☐ Neither agree nor disagree
- ☒ Disagree
- ☐ Strongly disagree

Ensuring the vitality of town centres

Question 37: Do you agree or disagree that the Durham Strategic Place Plans provide the right foundation for shaping town centre policies in the new Local Plan?

- ☐ Strongly agree
- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Strongly disagree

Question 38: Do you think the current town centre hierarchy should be changed?

- ☒ Yes
- ☐ No
- ☐ Not sure / don't know

Question 38a: If yes, what changes are needed to better reflect shopping patterns, town-centre roles and future development priorities?

The City of Durham Parish Council considers that the retail hierarchy should be reviewed to give clearer recognition to the distinctive strategic role of Durham City, while maintaining a strong network of town, district and local centres across the county. This would build directly upon the evidence, consultation and policy approach developed through the Durham City Neighbourhood Plan rather than representing a wholly new direction.

The Neighbourhood Plan process identified the vitality and competitiveness of Durham city centre as a central economic priority. Its economy objective is to secure the vitality and competitiveness of the city centre through balanced retail development, while the evidence underpinning Policies E3 and E4 identified the retail sector as a key driver of the local economy and emphasised the importance of maintaining a balanced mix of independent and national retailers, services, food, leisure and other activities. These findings remain highly relevant to the preparation of the new Local Plan.

Importantly, the Neighbourhood Plan process also identified the competitive pressure on Durham city centre from large retail developments in nearby edge-of-town and out-of-town locations. Its supporting evidence specifically recognised the potential for trade to be lost from the city centre to these locations. Because those competing centres fell outside the Neighbourhood Plan area, the Plan could not address that issue directly through its own policies. Instead, it recognised that the County Durham Plan had an important role in considering these impacts. The preparation of the new Local Plan now provides the opportunity to address that issue comprehensively.

The existing County Durham Plan places Durham City and Bishop Auckland together as Sub-Regional Centres and identifies the Arnison Centre and Sherburn Road/Dragonville as District Centres. The Parish Council considers that the new Local Plan should review whether this hierarchy adequately reflects the very different functions and catchments of these locations. In particular, Durham City performs a much broader role encompassing retail, employment, professional services, education, culture, heritage, tourism, leisure and transport. The Parish Council therefore considers that the evidence supports recognising Durham City more clearly as the principal centre within County Durham, while retaining appropriate roles for Bishop Auckland and the county's other important town centres.

The roles of the Arnison Centre and Sherburn Road/Dragonville should also be more clearly defined. The Parish Council recognises their legitimate function in meeting the shopping and service needs of surrounding communities. However, consistent with the concerns identified through the Neighbourhood Plan process, their future development should not result in the incremental transfer of higher-order retail, leisure and other town-centre investment away from Durham city centre. Their role should therefore remain primarily focused upon district and day-to-day needs, with proposals of a scale or character capable of affecting the city centre subject to robust sequential and impact assessment.

This approach would also be consistent with Policies E3 and E4 of the Neighbourhood Plan, which seek a lively, vibrant and diverse city centre, retaining a strong retail function while supporting leisure, entertainment, office, arts, cultural and tourism uses, reuse of buildings and upper floors, improved public realm and better pedestrian and cycling environments. The hierarchy should consequently reflect the modern role of Durham city centre as much more than a shopping destination and should support the diverse mix of activities required to sustain footfall throughout the day and evening.

The Parish Council also considers that the new Retail and Town Centre Study should examine current shopping patterns, expenditure flows, vacancies, footfall, the independent retail sector and the cumulative impact of peripheral retail development. This should determine whether existing designations remain appropriate and provide evidence for a hierarchy based upon the actual function and future role of each centre, rather than simply carrying forward historic classifications.

This would accord with the direction of the December 2025 draft NPPF, which requires development plans to establish a hierarchy of centres as part of a positive strategy for their future and to consider opportunities for additional floorspace, diversification, intensification, reuse of vacant sites and premises, infrastructure and public-realm investment. The new hierarchy should therefore be used proactively to direct investment towards the locations where it can best strengthen existing centres.

Question 39: What are the main retail and town centre needs in County Durham? (Please tick all that apply)

- ☒ A wider range of shops and services
- ☒ More independent and local businesses
- ☒ Fewer vacant or empty units

- ☒ Improved public spaces (e.g. streets, squares)
- ☒ Better transport and access (including parking and public transport)
- ☐ More leisure, food and drink, and cultural activities
- ☐ More housing in town centres

Question 39a: How should the Local Plan respond to these needs?

The Local Plan should adopt a positive city-centre-first regeneration strategy rather than viewing retail policy primarily as a mechanism for controlling individual changes of use.

Durham requires a broader and more distinctive commercial offer. The Destination Management Plan's conclusion that the City's retail experience trails comparable historic cities such as York, Bath and Oxford should be treated as a call to action. The objective should be to establish Durham as one of the North's strongest independent, heritage and experience-led city centres.

The Plan should encourage independent retail, markets, cafés, restaurants, cultural uses, leisure, creative enterprises, professional services and appropriate evening uses. Durham Market and the Market Place should remain central to the commercial identity of the City. National policy specifically requires planning policies to retain and enhance existing markets and the regeneration of the Market Place as a space for events should be planned for positively in the new Local Plan.

Long-term vacancy should receive much greater attention. The Plan should support subdivision of oversized units where appropriate, meanwhile uses, pop-up businesses, flexible workspace, creative enterprises and sympathetic conversion of redundant floorspace. The County's own Inclusive Economic Strategy calls for unused retail units to be transformed into spaces for cultural and creative enterprises, start-ups and SMEs and for events, leisure and culture to draw people back into centres.

Upper floors are a particularly underused resource. Appropriate residential, office and other productive uses above shops can increase the number of people living and working in the centre while supporting building maintenance. Existing Durham City planning evidence already advocates reuse of redundant upper floors.

Public realm should be regarded as economic infrastructure. Attractive, clean, safe and accessible streets increase dwell time and strengthen the setting in which businesses trade. Improvements should particularly strengthen the sequence from the railway station and North Road through the Market Place and towards the World Heritage Site, alongside better links with the riverside and Aykley Heads.

The Plan should also protect commercial activity from poorly conceived residential conversion. More city-centre living is desirable, but new residents moving into an established mixed-use centre should not subsequently constrain legitimate cultural, hospitality or evening-economy businesses.

Above all, the Local Plan should make **investment in Durham city centre easier where proposals are high quality and reinforce its vitality.**

Question 41: Do you think the Local Plan should set a local retail impact threshold below the national default of 2,500sqm?

- ☒ Yes
- ☐ No
- ☐ Not sure / don't know

Question 41a: If yes, what threshold would be appropriate? (Please tick one)

- ☐ Less than 500 sq m
- ☒ 500–1,000 sq m
- ☐ 1,001–1,500 sq m
- ☐ 1,501–2,000 sq m
- ☐ 2,001–2,499 sq m
- ☐ Other (please specify)

Question 42: Do you think the Local Plan should include a policy to limit the number or concentration of hot food takeaways in town centres?

- ☒ Yes
- ☐ No
- ☐ Not sure / don't know

Question 42a: If yes, what types of restrictions should be considered?
(Please tick all that apply)

- ☒ Limit the number of takeaways in a specific area
- ☒ Limit the percentage of units that can be takeaways
- ☒ Restrict locations (e.g. near schools or in certain parts of centres)
- ☒ Control opening hours
- ☒ Consider health impacts (e.g. promoting healthier environments)
- ☐ Require high standards of design and appearance
- ☐ Other (please specify)

Facilitating the sustainable use of minerals

Question 51: Do you agree or disagree that these are the mineral types of national and local importance that should be addressed within the new Local Plan?

Yes, we agree that these materials should be addressed.

Question 52: Are there any other mineral types which are not listed or addressed and discounted above which should be considered?

No, because everything else has been discounted.

Question 53: Do you think maintaining a steady supply of aggregates will require allocating new sites or allowing extensions to existing quarries?

Yes, we agree.

Question 54: Alongside meeting identified need and avoiding over-concentration of reserves, are there any other factors you think should be considered when planning for future aggregate supply?

The increasing demand for natural stone for new buildings and for renovation/extension of old buildings could generate an increased need for quarries and this possibility should be built into the plan.

Paragraph 135 The justification for continued protection of the high-grade deposits at Hawthorn Quarry is less clear. These reserves were previously used for coloured glass manufacture at the Hartlepool Magnesia Plant, which closed in 2005. Views are therefore invited on whether safeguarding these deposits remains necessary.

Yes, retain the safeguard because new processes to recover magnesium may emerge in future.

Question 55: Do you agree or disagree that the Local Plan should ensure sufficient brickmaking raw materials for County Durham's brickworks and safeguard scarce industrial mineral resources?

We agree

Question 56: Are there any other industrial minerals that you believe the new Local Plan should also address?

: We do not understand why vein minerals have apparently been excluded from this section and the position of the County Council Local Plan is not clear and should be clarified (cf paragraph 143 in this report). For example, the world price for fluorspar was \$110/tonne in 1999, when the last mine in Durham closed. It is now \$560/tonne. This 5-fold enhancement in value cannot be disregarded for future potential. Again, 60% industrial grade witherite shows a similar enhancement in value and is now heavily imported from China. The Pennines and the North East were once a primary source for witherite and it was mined in the coalfields up until 1940 and these resources

are likely to remain as an option. It is not clear in the document if these potential opportunities have been ignored.

Question 57: Is there still a need to afford specific protection to the high-grade dolomite which is safeguarded at Hawthorn Quarry?

Yes, as per the response to Paragraph 135.

Question 58: How do you think the new Local Plan should balance resource availability with environmental and community considerations?

Because mineral resources are physically restricted by their geological location, they cannot be moved, whereas houses can. This key principle ensures that surface construction does not permanently block access to valuable geologic materials and the local Plan must embody this principle. Protecting access to finite underground mineral resources must therefore be given equal or greater legal and planning weight than the social or economic demand for building surface projects such as housing or roads. If you build over them, they are gone; and if you build next to a geological resource, the new residents might complain about dust and blasting. This inadvertently creates a buffer zone that effectively sterilises the adjacent geology from ever being extracted.

Question 59: The existing Policies 54 & 55 set out the current approach to maintaining a steady and adequate supply of natural building and roofing stone, including from relic quarries. Are any changes needed to how the new Local Plan should provide for future supply of these materials?

To an extent this response has already been covered under question 54. There is now a real and growing demand for natural materials for building purposes. The Council has a poor reputation in its response to this need. Yet, when stone masons have been told by planning officers that they could only use 'local stone' for repairs, restorations and extensions, when they asked for planning permission to re-open local quarries essential to meet this demand they have been refused. The inability of the County Council to have consistent planning procedures with 'joined-up thinking' is normal and detrimental to good practice.

Question 60: We plan to support recycled aggregate production at suitable places, such as active mineral sites, landfills, and permanent waste management facilities. Are there other locations we should consider, and is there anything else the Local Plan should take into account when planning for recycled aggregate production?

Does this also include recognised demolition sites that have crushers located them?

Question 61: Should MSAs broadly follow existing boundaries, excluding coal?

Yes, because Mineral Safeguarding Areas uses the well-established British Geological Survey guidance and resource information from both the BGS and the Mining Remediation Authority.

Question 62: Should safeguarding be removed beneath built-up areas?

No, because this would disregard the potential value of the resources below the built-up area without an independent and rigorous strategic and commercial analysis.

Furthermore, there will be circumstances involving boundaries between expanding settlements and existing quarries/reserves. In such circumstances the minerals ought to have priority.

Question 63: How should the Local Plan best encourage prior extraction on both allocated and non-allocated development sites, and should the requirement for a Mineral Assessment be retained as part of this approach?

You cannot “encourage prior extraction” of mineral resources because these are driven by strategic need, market value and exhaustion. At all times a Mineral Assessment is essential based on accurate geological and geophysical data.

Question 64: Do you agree or disagree that, in addition to safeguarding sites used for the transport, handling and processing of minerals and recycled aggregates, the new Local Plan should also continue to safeguard existing active, inactive and dormant mineral sites, and mineral allocations, from encroachment by nonminerals development through the use of Minerals and Waste Safeguarding Zones and supporting Waste Infrastructure Assessments?

We agree.

Question 65: Are there any other key issues relating to planning for minerals that the Local Plan should address?

Planning for minerals relies on a detailed knowledge of the mineral resources of the entire Plan area, its history, its present state, and an insight into its future based on the changing commercial and strategic values of all the resources to which there is access. These evaluations must be updated regularly and must not rely on the occasional redrafting of a Local Plan.

Creating high quality, sustainable places

Question 71: Do you know of any suitable small, medium and large sites for allocating which have the potential for redevelopment to secure a more effective use, such as through the re-use of service yards, car parks and other transport infrastructure, under-utilised retail sites and estate regeneration schemes?

Yes.

Question 71a: If yes, what type of sites do these include?

As a parish council, we have restricted our search to sites within our Parish. Also, sites within the Green Belt have not been considered. Within those constraints there are sites that could be used for housing (including student accommodation), education, visitor accommodation and retail.

Question 71b: Please provide details of any sites you are aware of (including location and any relevant information)

The only sites we are aware of are these ones which have been put forward as part of the call for sites:

287230 – 0.59ha at Milburngate (various uses including housing)

286629 – 0.08ha at the north-eastern side of Holly Street DH1 4ER (housing)

286671 – 0.21ha at St John's Road DH1 4NU (housing)

287479, 287478, 287480, 287481, 287482 – various sites amounting to 9.38ha at the College of St Hild and St Bede (education). Part of 287478 is in the Green Belt and this should not be developed.

286716 – 4.60ha at the College of St Hild and St Bede, overlapping site 287478 (housing and related uses). Part of this site is in the Green Belt and should not be developed.

287503 – 0.73ha (education) at James Barber House. This site has planning permission for refurbishment.

287499 – 4.61ha at St Mary's College (education)

287492 – 1.02ha at the Elvet Hill car park, adjacent to Trevelyan College (education)

287493 – 3.13ha at Durham Business School, Mill Lane (education)

Question 72: Do you know of any opportunities to make more effective use of land in your area, including on small sites (for example infill development, redevelopment of low-density sites, or increasing building heights in appropriate locations)?

Yes.

Question 72a: If yes, what types of opportunities are these?

Student accommodation in PBSAs and Colleges is at a much higher density than in HMOs converted from family homes. For example, Regatta Place (0.24ha) has beds for 125 students = 520/ha and Melbury Court, currently under construction, will house 232 students in 0.49ha = 470/ha. Even at 40 dwellings / ha and an average 5 students / HMO there would only be 200 students per ha. Consequently we favour building PBSAs and encouraging students to live in them, thereby freeing up HMOs to be converted back into use class C3 family homes.

We also favour continuing the existing policy of converting unused upper floors of city centre shops into student accommodation.

With a World Heritage Site at the centre of our City increasing building heights in the inner setting would be inappropriate, and further out would need to be assessed carefully.

Question 72b: Please provide details of any sites or opportunities you are aware of (including location and any relevant information).

The unused upper floors of city centre shops.

Question 73: Should the new Local Plan set higher density standards for town centres and for locations that have a high level of connectivity, and if so, what locations would they apply to?

Yes. We support the approach set out in the draft NPPF. In addition, the focus on railway stations is a very south-east concept. County Durham has 8 railway stations on the national network; Kent, with four times the population, has 106; demonstrating further the need to invest in substantial rail network across County Durham, e.g. the Leamside Lane. Therefore bus stations and transport hubs should be put on the same footing as railway stations.

Question 74: Should minimum density standards be set for other parts of the local plan area, especially where there are opportunities for intensification?

Yes. We support the approach set out in the draft NPPF.

Question 74a: If yes, what densities should be used and what locations would they apply to?

Generally we see developers over-providing detached homes. For example, at Bellway's Sniperley Farm development 36% of the dwellings are detached, and this reduces the density. The same percentage of dwellings are 4- and 5-bedrooms where the need is for a preponderance of 2- and 3-bedroomed properties. There should be an overall minimum density throughout the County and we suggest 35 dwellings/ha and running alongside that a requirement that housing developments of 10 or more dwellings will be required to provide an appropriate mix of housing sizes (number of bedrooms) as specified in a table. We suggest a maximum of 25% on houses with four or more bedrooms.

Question 75: Do you agree or disagree with the proposed approach to retain local guidance that covers residential extensions?

We agree. Both of the SPDs have been valuable in driving up living standards.

Question 75a: If you agree, how should this guidance be included?

As far as is possible their content should be incorporated in Plan policies or the supporting text as this will carry more weight than as local guidance.

Protecting Green Belt Land

Question 76: Do you think the Local Plan should include a policy on Green Belt?

Yes

Question 76a: If yes, what should the policy include that is not included at a national level?

The Parish Council strongly supports the inclusion of a dedicated Green Belt policy within the new County Durham Plan. Whilst national policy provides the overarching framework, a local policy should reflect the particular importance of the County Durham Green Belt in preventing unrestricted urban sprawl, safeguarding the historic setting of Durham City and supporting the regeneration of existing towns and communities.

The policy should make clear that Green Belt boundaries should only be altered in exceptional circumstances, supported by robust evidence that all reasonable alternatives have been fully explored. This should include maximising the delivery of existing housing allocations and extant planning permissions, making effective use of previously developed land, increasing densities where appropriate and considering suitable sites outside the Green Belt before Green Belt release is contemplated.

Before concluding that exceptional circumstances exist to justify further Green Belt release, the Council should demonstrate that the housing requirement cannot be met through existing allocations and the substantial pipeline of extant planning permissions, including the significant contribution already made by Durham City through strategic Green Belt releases.

Where any review of Green Belt boundaries is proposed, the Local Plan should require a robust and transparent assessment of the contribution that land makes to the purposes of the Green Belt, together with a clear justification for why release is necessary. Particular regard should also be given to the contribution that land makes to the setting of Durham City, including the protection of its landscape character and the Outstanding Universal Value of the UNESCO World Heritage Site.

The policy should also ensure that any proposals affecting the Green Belt are supported by appropriate infrastructure and contribute positively to sustainable patterns of development.

Promoting sustainable transport

Question 78: Do you consider the current parking standards set out in the Parking and Accessibility SPD provide useful guidance that is applicable and relevant to County Durham?

No

Question 79: if no, what changes are required to the parking standards?

The biggest weakness in the Parking and Accessibility SPD is that it does not differentiate between urban and rural areas and provides tables of required parking provision which are to be applied equally across the whole of County Durham. The SPD states that a lower level of car parking provision may be considered in accessible locations (defined according to the frequency of public transport services) but does not give any guidance as to what these lower rates should be.

The new NPPF requires development to be located “where it can support sustainable patterns of movement” (TR1, 1b). Policy TR2 requires development plan to “set local parking standards for residential and non-residential development” to promote sustainable transport and says that parking standards should take into account:

- the connectivity of development in different locations
- opportunities for improvements in active travel and public transport
- local car ownership levels, including opportunities to promote car sharing

The current SPD takes account of none of these in any meaningful way.

The DfT's connectivity tool demonstrates a huge range in the accessibility of different locations in the county. Villages like Cornsay and Satley have a score of 8 or 10, whereas central Durham city reaches connectivity scores of 80 or above, and suburbs like Newton Hall and Gilesgate score in the high 60s or 70s. There is also a large variation in car ownership, with areas like Gilesgate and Claypath having an average of around 0.8 cars per household, while at the other extreme Newton Hall averages 1.42 cars per household, and Staindrop averages 1.53.

The residential parking rates set in the SPD are significantly in excess of those needed to accommodate current levels of car ownership, even in rural and affluent areas. There is too much reliance on in-curtilage parking which makes poor use of land. With 2-bedroom houses being required to have two parking spaces, smaller dwellings (for which there is the greatest need) become unviable for developers to build. The high car parking requirement squeezes out the possibility of providing open green space and makes developments more spread out. This makes estates less attractive to access by active travel and public transport and increases the pressure on the Durham green belt as well as taking more agricultural land.

(Note: this can be substantiated by reference to the 2021 census data analysis conducted by the City of Durham Trust and found in its submission to the final SPD consultation in 2023.)

As quoted in the joint RTPI and TCPA publication "Promoting sustainable transport through planning" (December 2025):

The Climate Change Committee advises that in order to meet national net-zero targets, local development plans and transport plans should aim to deliver a 33%-35% modal shift away from cars towards walking, cycling and public transport for shorter trips. Urban areas can set even more ambitious targets.

In relation to parking, the publication encourages policies which "set requirements for new development that disincentivise private car use, such as setting maximum car parking standards, low emissions zones and traffic calming". It also advocates for transport sharing and hire schemes to help reduce car ownership levels. Developers should "manage the provision of car parking (including consideration of charging for use), so that it supports decarbonisation of transport". The document recommends setting targets to ensure all developments are air quality neutral. This is an important issue for Durham City.

The local plan should therefore set maximum parking standards for residential developments as well as non-residential, especially in accessible locations, with car share provision being an integral part of the policy. Stricter policy on the proportion of dwellings of different sizes should be included, and the density of the development. There should be more shared parking spaces and fewer private spaces, to optimise land use.

Mixed use developments could encourage daytime parking to access employment or amenities to double as residential over-night parking. On-street parking controls such as permits should be an integrated part of the approach. Charging for parking at non-residential developments should be the norm, to manage down demand. This should not be seen as "poor design" or "failure to provide enough parking" but instead as helping to deliver the transport vision for the plan and promoting sustainable transport in accordance with NPPF TR2(1).

To enable people to be less dependent on cars, there will also need to be policies on provision of amenities, and in a timely manner so that residents of new estates can use them from the outset. A clear example of the failure of current planning policies is the Mount Oswald development, which still has no food retail available nearby. There should be no large estates beyond walking distance of basic amenities.

Question 80: Are there any transport routes that should be allocated or safeguarded in the Local Plan?

Yes.

Question 80a: Please provide details of any routes (including location and any relevant information).

Land to enable creation of a Newton Hall to Belmont Viaduct cycle and walking route. This is of relevance to the City of Durham Parish as it will reduce traffic through the Air Quality Management Area and will support access to the likely new railway station on the Leamside Line near the Belmont Park and Ride.

Question 81: Do you agree or disagree that the Local Plan should define what level of development would create a 'significant' amount of movement?

Yes. Such thresholds are necessary to be able to apply national decision-making policies TR3 and TR6. TR3 specifically refers to the context of an area when assessing the amount of movement generated.

Question 81a: What should be considered when setting this threshold?

The Local Plan should consider the current connectivity of the area, the level of capacity in the local road network, the quality of active travel facilities, and whether the traffic generated will impact on the Durham City Air Quality Management Area.

Pollution, public protection and security

Question 88: Have we identified above, all the natural and man-made hazards and other land use restrictions which may inhibit or affect the development of land in County Durham and is there any evidence or information available on how the impacts of climate change could exacerbate risks and hazards?

Admittedly there is a greater risk of flooding in Durham, which the report comments on, but there should also be something mentioned about the possibility of landslides.

Question 89: Which local environment targets and objectives do we need to address through the new local plan?

The Parish Council considers that the new Local Plan should establish a comprehensive environmental strategy which moves beyond the traditional objective of protecting environmental assets from harm and instead seeks to deliver measurable environmental recovery across County Durham. The Plan should recognise that the climate emergency, ecological emergency and nature recovery agenda require planning to deliver positive environmental outcomes rather than simply mitigating the impacts of development.

The Local Plan should therefore establish environmental objectives which support the recovery of biodiversity, strengthen ecological resilience and deliver a coherent Nature Recovery Network across the County. Development should contribute positively to the restoration, expansion and connection of habitats, complementing the statutory Biodiversity Net Gain regime and supporting the objectives of the County Durham Local Nature Recovery Strategy. Habitat enhancement should be planned strategically at a landscape scale rather than through isolated site-by-site mitigation.

The protection and enhancement of green infrastructure should be a central objective of the Plan. Green and blue infrastructure should be planned as an integrated network linking settlements, river corridors, woodland, open space, parks, agricultural landscapes and wildlife habitats. Within Durham City this should build upon the Green Infrastructure and Emerald Network policies contained within the Durham City Neighbourhood Plan, creating a resilient ecological network that supports biodiversity, recreation, active travel, health and wellbeing, climate resilience and the setting of the World Heritage Site.

The Local Plan should also prioritise climate change adaptation alongside climate change mitigation. New development should be expected to increase resilience to flooding, overheating, drought and extreme weather through the use of nature-based solutions, sustainable drainage systems, woodland creation, wetland restoration, tree planting, green infrastructure and multifunctional open spaces. The Plan should seek to reduce flood risk through natural flood management measures wherever appropriate while improving biodiversity and water quality.

The Parish Council considers that the protection, enhancement and recovery of County Durham's landscapes should form a fundamental environmental objective. This should include the North Pennines National Landscape, Areas of Higher Landscape Value, the Wider Coastal Zone and the distinctive landscapes surrounding Durham City. Landscape policies should seek not merely to conserve scenic quality but also to protect tranquillity, dark skies, biodiversity, cultural heritage, geological interest, historic landscapes and opportunities for recreation, recognising that these qualities collectively contribute to landscape value. The County Durham Local Landscape Designations Review provides a robust evidence base for this approach.

The Local Plan should also establish ambitious objectives for tree canopy expansion, woodland creation and hedgerow restoration. Existing mature trees, woodland and historic hedgerows should be retained wherever possible, recognising that they provide environmental benefits which cannot be replicated within the lifetime of new development. New development should make a measurable contribution to increasing tree cover, strengthening habitat connectivity and improving climate resilience through long-term landscape management.

The Parish Council considers that the Plan should place greater emphasis upon the protection and enhancement of river corridors and the wider water environment. Rivers should be recognised not only as drainage features but as multifunctional environmental assets supporting biodiversity, flood management, recreation, landscape character and heritage. Within Durham City, the River Wear should continue to be recognised as the principal green and blue infrastructure corridor and as an essential component of the setting and Outstanding Universal Value of the Durham Castle and Cathedral World Heritage Site.

The Local Plan should further promote high-quality placemaking which integrates environmental objectives into the design of new development. Sustainable drainage, green roofs, street trees, urban greening, wildlife habitats and accessible open spaces should be considered fundamental components of development rather than optional enhancements. Environmental infrastructure should be planned alongside transport and other physical infrastructure from the earliest stages of site design.

The Parish Council also considers that the Local Plan should recognise the important contribution made by environmental quality to human health and wellbeing. Access to high-quality green space, woodland, rivers, parks and the wider countryside should be improved through connected walking and cycling networks and the enhancement of public rights of way. The environmental objectives of the Plan should therefore contribute directly to healthier communities as well as biodiversity recovery and climate resilience.

Question 90: What do you consider we should do to maintain public safety and security, is there any land that needs to be allocated for such purposes or do you consider that these matters can be solely addressed through the design of the new development?

It depends on the designs of the new developments. Maintaining spaces for people to spend time outside as well meeting any requirements for new builds.

Conserving and enhancing the environment

Question 91: Do you think the Local Plan should include a local policy on flood risk?

Yes

Question 91a: If yes, what should it contain?

The Local Plan should include a comprehensive, locally distinctive policy on flood risk that builds upon national policy whilst reflecting County Durham's particular environmental and landscape characteristics. National Development Management Policies should be regarded as establishing the minimum national framework rather than replacing locally justified planning policy.

The Council's extensive evidence base, particularly the Strategic Flood Risk Assessment, clearly demonstrates that County Durham possesses distinctive flood risk characteristics which require a bespoke policy response informed by local evidence and consistent with the statutory duty under section 19(1A) of the Planning and Compulsory Purchase Act 2004 to secure adaptation to climate change.

The policy should continue the successful approach established by Policy 35 of the adopted County Durham Plan by requiring all development proposals to demonstrate that flood risk has been avoided wherever possible through site selection, the application of the Sequential Test, and the incorporation of resilient design measures. Development should not be permitted where it would increase flood risk on-site or elsewhere, either individually or cumulatively, taking account of the impacts of climate change throughout the lifetime of the development.

The policy should require applicants to consider all sources of flooding, including fluvial, surface water, groundwater, sewer, reservoir and ordinary watercourse flooding. Whilst river flooding remains a significant issue throughout the County, increasingly frequent high-intensity rainfall events mean that surface water flooding is becoming an equally important planning consideration. The Strategic Flood Risk Assessment demonstrates that surface water flooding affects many locations beyond the recognised river floodplain and therefore requires explicit policy recognition rather than being addressed solely through technical drainage design.

The policy should require development proposals to be informed by the most up-to-date Strategic Flood Risk Assessment, Environment Agency mapping and climate change allowances. Site-specific Flood Risk Assessments should demonstrate how climate change projections have influenced site layout, finished floor levels, drainage infrastructure, emergency access and long-term resilience. The Local Plan should make clear that flood resilience is an integral component of good placemaking rather than a technical matter addressed at the end of the design process.

The policy should also require Sustainable Drainage Systems (SuDS) to be designed as multifunctional green infrastructure rather than conventional engineering infrastructure. SuDS should provide multiple environmental benefits by reducing flood risk, improving water quality, supporting biodiversity, enhancing landscape character, mitigating urban heat, storing carbon and creating attractive public spaces. Preference should be given to above-ground, nature-based drainage features including wetlands, attenuation ponds, swales, rain gardens, filter strips, permeable paving, tree pits and other blue-green infrastructure which contribute positively to place-making and biodiversity recovery.

The Local Plan should place greater emphasis upon natural flood management and catchment-based approaches to flood resilience. Development should contribute, where appropriate, to woodland creation, wetland restoration, floodplain reconnection, river restoration and habitat enhancement which slow the movement of water through catchments whilst delivering wider environmental benefits. Such measures are particularly important within the River Wear catchment where flood management, biodiversity recovery and landscape enhancement are intrinsically linked.

The policy should explicitly recognise the important contribution made by trees, woodland and hedgerows to flood management. Existing trees should be retained wherever possible because mature trees intercept rainfall, increase infiltration, stabilise soils and reduce surface water runoff. Where tree loss is unavoidable, replacement planting should reflect the principles established within the Trees, Woodlands and Hedges Supplementary Planning Document, ensuring that replacement is appropriate in terms of quantity, species, canopy cover and long-term ecological function. Given the Government's proposed reforms to Supplementary Planning Documents, these detailed requirements should now be incorporated directly within Local Plan policy to ensure they retain full statutory weight.

Similarly, the Local Plan should incorporate the principles contained within the Biodiversity Supplementary Planning Document by requiring flood mitigation measures to contribute positively to habitat creation, ecological connectivity and biodiversity enhancement. Sustainable drainage infrastructure should be designed to deliver measurable environmental gains wherever possible rather than simply satisfying minimum drainage standards.

The policy should also recognise the particular importance of flood risk management within Durham City. The River Wear forms an essential part of the setting and Outstanding Universal Value of the Durham Castle and Cathedral World Heritage Site. Development affecting the river corridor should therefore demonstrate not only that flood risk has been appropriately managed but also that proposals conserve and, wherever possible, enhance the significance, setting and environmental quality of the World Heritage Site, designated heritage assets and the wider historic landscape.

The Local Plan should further require development proposals to demonstrate how flood risk management has been integrated with wider green infrastructure provision, biodiversity enhancement, landscape character, public open space and active travel infrastructure. Flood management should not be considered in isolation but as part of a coordinated strategy for climate adaptation, environmental enhancement and sustainable place-making.

Finally, the policy should include clear requirements for the long-term management, maintenance and monitoring of Sustainable Drainage Systems and other flood mitigation measures. It should require developers to demonstrate that appropriate management arrangements are secured for the lifetime of the development and that drainage infrastructure will remain effective under projected future climate conditions.

The Parish Council considers that the existing Policy 35 has operated effectively and that there is no evidence to justify its removal. Instead, the new Local Plan should retain and strengthen a locally specific flood risk policy, incorporating the detailed principles currently contained within the Council's environmental Supplementary Planning Documents.

Question 92: Is there any additional evidence that should be considered in identifying opportunities for the conservation, enhancement and recovery of County Durham's natural environment?

The Parish Council considers that the evidence base underpinning the new Local Plan should extend beyond the documents identified within the consultation paper to ensure that planning policies are robust, evidence-led and capable of responding to the biodiversity and climate emergencies.

In addition to the County Durham Local Nature Recovery Strategy, Landscape Character Assessment, Landscape Strategy and North Pennines National Landscape Management Plan, the Council should have regard to the County Durham Strategic Flood Risk Assessment, River Wear Catchment Flood Management Plan, Environment Agency River Basin Management Plans and Catchment Data Explorer, all of which identify opportunities to restore river corridors, reconnect floodplains, improve water quality, enhance wetland habitats and deliver nature-based solutions that contribute simultaneously to biodiversity recovery, climate adaptation and flood resilience.

The Local Plan should also draw upon Natural England's Green Infrastructure Framework and Green Infrastructure Standards, which provide nationally recognised guidance on creating multifunctional green infrastructure networks that improve ecological connectivity, public health, climate resilience and access to nature. These should inform both strategic site allocations and development management policies.

The Council should also utilise the latest habitat mapping, priority habitat inventories, ancient woodland inventories, veteran tree inventories, Local Wildlife Site surveys, ecological network mapping and species distribution data held by the Durham Environmental Records Information Centre (ERIC North East), Natural England, the Environment Agency and local wildlife organisations. Ecological evidence should be regularly updated throughout the preparation of the Local Plan so that policies reflect the best available scientific information rather than datasets that may become outdated before adoption.

The Parish Council also considers that the Council's own Supplementary Planning Documents contain a substantial body of locally specific evidence that should not be lost through planning reform. The Trees, Woodlands and Hedges SPD, Biodiversity SPD, Energy Efficiency, Renewables and Historic Environment SPD and Solar Energy SPD all contain detailed analysis of County Durham's environmental assets, ecosystem services and opportunities for environmental enhancement. If Supplementary Planning Documents are to have a reduced role under the reformed planning system, the evidence and policy principles they contain should be incorporated into the new Local Plan wherever appropriate to ensure that this locally derived knowledge continues to inform planning decisions.

Further evidence should also be drawn from County Durham's Climate Emergency Response Plan, Carbon Reduction Strategy and emerging Climate Adaptation Strategy. The statutory duty under section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires Local Plans to contribute towards both climate change mitigation and adaptation. Consequently, opportunities for habitat restoration should be considered not only for their biodiversity value but also for their contribution to carbon sequestration, natural flood management, urban cooling, drought resilience and wider ecosystem services.

The evidence base should also recognise the close relationship between the natural environment and the historic environment. Within Durham City, and elsewhere across the County, green infrastructure, river corridors and woodland contribute significantly to the significance and setting of designated heritage assets, including the Durham Castle and Cathedral World Heritage Site. Evidence prepared for the World Heritage Site Management Plan, Historic England's Green Infrastructure and Heritage guidance, Conservation Area Appraisals and Historic Landscape Characterisation should therefore be considered when identifying opportunities for environmental enhancement, ensuring that biodiversity recovery and heritage conservation are planned together rather than in isolation.

Finally, the Parish Council considers that the evidence base should explicitly assess opportunities for landscape-scale nature recovery rather than focusing solely on individual development sites. The Local Plan should identify opportunities to strengthen ecological networks through habitat creation, woodland expansion, river restoration, species-rich grassland, peatland restoration where appropriate, urban greening and the enhancement of the County's extensive network of parks, open spaces and public rights of way. Nature recovery should be planned strategically across administrative boundaries and should contribute to the Government's Environmental Improvement Plan, the objectives of the Environment Act 2021 and the delivery of Local Nature Recovery Strategies.

Question 93: Are there any specific opportunities you would highlight for development to support the conservation, enhancement and recovery of County Durham's natural environment?

The Parish Council considers that the principal opportunity is not simply the delivery of individual habitat creation projects but the establishment of a coherent, landscape-scale Nature Recovery Network across County Durham. The new Local Plan should move beyond requiring development merely to mitigate its environmental impacts and instead require development to make a measurable contribution towards ecological recovery, climate resilience and the enhancement of green and blue infrastructure. This approach would be consistent with the Environment Act 2021, the Local Nature Recovery Strategy, the Government's Environmental Improvement Plan and the draft National Planning Policy Framework's emphasis upon nature recovery and multifunctional green infrastructure.

Within Durham City, the statutory Durham City Neighbourhood Plan already provides an excellent framework for delivering these objectives through Policies G1 (Protecting and Enhancing Green and Blue Infrastructure) and G3 (Creation of the Emerald Network). Rather than developing a separate strategy, the new County Durham Local Plan should build upon and strengthen this existing policy framework by requiring development proposals to contribute to the delivery of these established objectives. Policy G1 supports the enhancement of green and blue infrastructure, ecological connectivity, biodiversity net gain, green corridors and improvements to the public rights of way network, whilst Policy G3 identifies the Emerald Network as the principal mechanism for creating an interconnected network of accessible wildlife sites across Durham City.

The Emerald Network represents one of the most significant opportunities for nature recovery within County Durham. It brings together Local Nature Reserves, Local Wildlife Sites, ancient woodland, parks, gardens and the River Wear corridor into a connected ecological network linked by public rights of way and accessible green infrastructure. The Network includes Observatory Hill, Flass Vale, Wharton Park, Aykley Heads, Aykley

Wood, Hopper Wood, the River Wear riverbanks at The Sands and the Racecourse, Peninsula Woodlands, Pelaw Wood, Houghall, Maiden Castle, Great High Wood, Little High Wood, Hollinside Wood, Blaid's Wood, Durham University Botanic Garden, Low Burnhall Wood, Farewellhall Wood and Baxter Wood. The Neighbourhood Plan expressly supports proposals that improve biodiversity, strengthen ecological connectivity and enhance accessibility throughout this network.

The Parish Council considers that the National Trust's Durham City Green Corridor provides an excellent example of how these strategic objectives can be delivered in practice. By creating a continuous nature-rich corridor along the River Wear, connecting habitats, improving biodiversity, restoring river corridors, increasing public access and enhancing the setting of the historic city, the Green Corridor directly reflects the ambitions of Policies G1 and G3. The Local Plan should explicitly support comparable partnership-led projects that reconnect fragmented habitats, improve ecological resilience and strengthen links between urban communities and the natural environment.

The River Wear should be recognised as the principal ecological spine of Durham City. Development proposals affecting the river corridor should contribute towards habitat restoration, wetland creation, riverbank enhancement, natural flood management, improvements in water quality and increased biodiversity whilst conserving the internationally important setting of the Durham Castle and Cathedral World Heritage Site. The Neighbourhood Plan highlights the Durham Riverbanks Strategy, prepared by Blue Sail Consulting on behalf of the principal landowners, as identifying a series of projects to revitalise the Peninsula riverbanks which directly complement the Emerald Network. The new Local Plan should support the implementation of these initiatives and encourage similar projects elsewhere along the River Wear corridor.

The Local Plan should also identify opportunities arising from the redevelopment of Aykley Heads, ensuring that this strategically important site becomes an exemplar of environmentally led regeneration. Both the County Durham Plan and the Durham City Neighbourhood Plan recognise the importance of preserving and enhancing existing woodland, open spaces, ponds and habitats, improving public access and strengthening ecological connectivity as part of redevelopment. The redevelopment of Aykley Heads should therefore contribute positively to the Emerald Network and the wider Nature Recovery Network rather than being considered solely as an employment allocation.

Development should also contribute to strengthening ecological links beyond the city itself. The Neighbourhood Plan identifies opportunities to improve wildlife corridors connecting Durham City with the Deerness Valley, Bearpark, Croxdale Woods and the Brasside and Low Newton wetlands. These wider landscape connections are essential if habitats are to become sufficiently resilient to support species recovery and adaptation to climate change. The Local Plan should therefore require larger development proposals to demonstrate how they contribute to the wider Nature Recovery Network rather than limiting biodiversity enhancement to the application site.

The Parish Council also considers that opportunities exist to increase urban tree canopy, restore species-rich grasslands, create wetlands and ponds, enhance sustainable drainage systems as biodiversity assets, improve ecological management of parks and public open spaces, and expand habitat provision through native woodland planting and hedgerow restoration. Sustainable Drainage Systems should be designed as multifunctional green infrastructure delivering flood attenuation, biodiversity enhancement, carbon sequestration, improved water quality and public amenity rather than simply satisfying engineering requirements.

Question 94: Do you think the Local Plan should include a policy on Areas of Higher Landscape Value (AHLVs) and/or the Wider Coastal Zone?

Yes – for both.

Question 94a: If yes, what should these policies include?

The Parish Council strongly supports the inclusion of dedicated Local Plan policies for both the Areas of Higher Landscape Value (AHLVs) and the Wider Coastal Zone. These landscapes represent some of County Durham's most distinctive environmental assets and make a substantial contribution to the County's landscape character, biodiversity, cultural heritage, recreation, tourism, climate resilience and the health and wellbeing of local communities. Their protection should not rely solely upon general countryside or landscape policies.

The County Durham Local Landscape Designations Review demonstrates that the proposed Areas of Higher Landscape Value have been identified through a rigorous evidence-based assessment considering landscape condition, scenic quality, rarity, representativeness, natural and historic environment, recreation, perceptual qualities and cultural associations. The Review concludes that significant areas across the North Pennines fringe, the West Durham Coalfield, the Wear Lowlands, the Dales Fringe, the East Durham Limestone Plateau and the Tees Lowlands possess elevated landscape value and should continue to benefit from local landscape designation.

The Parish Council considers that the Local Plan should recognise that these landscapes collectively represent approximately one-third of County Durham. They therefore constitute a strategic environmental resource rather than a series of isolated local designations. The Local Plan should acknowledge their contribution to the County's identity and ensure that development proposals conserve and, wherever possible, enhance their special qualities.

The policy should require development proposals within, or affecting the setting of, Areas of Higher Landscape Value to demonstrate through proportionate Landscape and Visual Impact Assessment that they conserve the distinctive landscape character, scenic quality and tranquillity of these areas. Particular attention should be given to cumulative impacts arising from multiple developments, the erosion of landscape character through incremental change, and the effects of infrastructure, lighting, telecommunications, renewable energy development and mineral extraction upon landscape quality and dark skies.

The policy should also recognise that landscape is more than visual appearance. The Landscape Designations Review highlights the importance of biodiversity, ancient woodland, river valleys, wetlands, historic parklands, designated and non-designated heritage assets, recreational opportunities, cultural associations and perceptual qualities such as tranquillity and remoteness as integral components of landscape value. These characteristics should therefore be explicitly recognised within the Local Plan and afforded appropriate protection alongside scenic quality.

The Parish Council considers that development within Areas of Higher Landscape Value should be expected not merely to minimise harm but to deliver positive landscape enhancement. Opportunities should be taken to restore degraded landscapes, strengthen green infrastructure networks, expand native woodland, restore hedgerows and stone walls, improve river corridors, reconnect fragmented habitats, enhance public access and reinforce local landscape character through high-quality landscape design.

Landscape enhancement should become an integral part of development proposals rather than being limited to mitigation.

The Parish Council believes strongly that, in light of this, the land around Durham City should remain designated as AHLV.

The policy should further recognise the close relationship between landscape character and climate resilience. Trees, woodland, wetlands, species-rich grassland and river corridors contribute not only to landscape quality but also to carbon sequestration, biodiversity recovery, natural flood management, water quality, urban cooling and climate adaptation. Landscape protection should therefore form part of the Council's wider response to the climate and ecological emergencies and should be considered alongside policies relating to biodiversity, green infrastructure and flood risk.

Within Durham City, the policy should recognise the exceptional importance of the landscape setting of the Durham Castle and Cathedral World Heritage Site. The incised valley of the River Wear, wooded riverbanks, open river meadows, surrounding agricultural land and historic parkland form an essential component of the Outstanding Universal Value of the World Heritage Site. The Landscape Designations Review identifies the unique landscape qualities of the Durham City area and the Wear Valley, reinforcing the need for continued protection through a locally distinctive planning policy.

The Parish Council also strongly supports the retention of a specific policy for the Wider Coastal Zone. Although much of the Durham Coast benefits from national and international environmental designations, the wider coastal hinterland performs an equally important function in protecting the landscape setting, ecological connectivity and undeveloped character of the coast. The policy should therefore extend beyond designated habitats and require development proposals to conserve the distinctive open character of the coastal landscape, protect important views to and from the coast, maintain the separation between settlements, strengthen ecological networks and support habitat restoration associated with the Durham Heritage Coast.

The Wider Coastal Zone policy should also support coastal resilience in response to climate change. It should promote nature-based solutions where appropriate, protect coastal habitats that contribute to carbon storage and biodiversity recovery, and ensure that development does not prejudice future adaptation to coastal change. Opportunities should be taken to enhance public access, improve the coastal green infrastructure network and support sustainable tourism compatible with the area's environmental capacity.

The Parish Council considers that both policies should reflect the Government's intention to simplify the planning system by ensuring that important locally specific guidance is contained within the statutory development plan itself. If Supplementary Planning Documents are to have a reduced role in future, the Local Plan should incorporate the key principles relating to landscape character, visual assessment, green infrastructure, biodiversity enhancement, woodland protection and landscape restoration that are currently contained within supporting guidance. This will ensure that the County's most valued landscapes continue to benefit from a robust, locally distinctive policy framework throughout the lifetime of the new Local Plan.

Question 95: Do you think any additional local policy is needed in the Local Plan to support national policies (NDMPs) for National Landscapes?

Yes

Question 95a: If yes, what should this additional local policy cover?

The Parish Council considers that the Local Plan should include locally distinctive policies which complement, rather than duplicate, the National Development Management Policies relating to National Landscapes. Whilst the NDMPs establish an important national baseline for conserving and enhancing National Landscapes, they cannot address the locally specific characteristics, environmental relationships and development pressures that exist within County Durham. The Local Plan should therefore provide additional policy guidance informed by the Council's own evidence base, including the Landscape Character Assessment, Landscape Strategy, Local Landscape Designations Review and Local Nature Recovery Strategy.

The North Pennines National Landscape forms one of County Durham's most important environmental assets and should be considered as part of a wider landscape and ecological system rather than an isolated designation. The County Durham Local Landscape Designations Review demonstrates that many landscapes immediately adjoining the National Landscape possess equivalent or closely related landscape qualities and contribute directly to its setting, tranquillity, ecological connectivity and perceptual qualities.

The Review specifically recommends the designation of extensive Areas of Higher Landscape Value beyond the National Landscape boundary, recognising that landscape character does not change abruptly at administrative or statutory boundaries. The Local Plan should therefore include policies requiring development outside the designated National Landscape to conserve and enhance its setting and avoid adverse cumulative impacts upon its special qualities.

The Local Plan should also recognise that the statutory purpose of conserving and enhancing natural beauty extends beyond scenic quality alone. The Landscape Designations Review identifies landscape value as arising from the interaction of natural beauty, biodiversity, geodiversity, cultural heritage, tranquillity, dark skies, recreational opportunities, historic landscapes and cultural associations. Local policy should therefore require development proposals affecting the National Landscape or its setting to demonstrate that these wider characteristics have been conserved and, wherever possible, enhanced.

The Parish Council considers that particular emphasis should be placed upon protecting the tranquillity and dark skies of the North Pennines National Landscape. Development proposals should be required to minimise light pollution, visual intrusion, noise and other forms of environmental disturbance which may individually appear limited but collectively erode the qualities for which the National Landscape has been designated. Cumulative landscape and visual effects should therefore be considered explicitly within the Local Plan.

The Local Plan should also promote landscape-scale environmental enhancement across and beyond the National Landscape. Development should contribute positively towards woodland creation, peatland restoration, river and floodplain restoration, species-rich grassland, habitat connectivity and natural flood management where appropriate. These measures would not only conserve landscape character but also contribute to biodiversity recovery, climate change mitigation, climate adaptation and improved ecosystem services, consistent with the Environment Act 2021 and the Council's wider environmental objectives.

The Parish Council further considers that local policy should encourage high standards of landscape-led design within settlements located inside or adjoining the National Landscape. New development should respond positively to local landscape character, topography, settlement pattern, traditional building materials, boundary treatments and historic field patterns, ensuring that the distinctive qualities of the National Landscape are reflected in development rather than eroded by standardised design solutions.

The Local Plan should require development proposals affecting the National Landscape to demonstrate consistency with the North Pennines National Landscape Management Plan and other relevant evidence prepared by the National Landscape Partnership. This would ensure that planning decisions contribute towards the long-term management objectives established for this nationally important landscape while remaining firmly rooted in County Durham's own evidence base.

Question 96: Do you agree or disagree that the Local Plan should include a policy to ensure development does not result in a net loss of biodiversity?

Strongly agree

Question 96a: Please tell us why you feel this way:

Once an area is lost, it cannot be replaced: mitigation or compensation are of little value.

The Local Plan should not simply seek to ensure that development avoids a net loss of biodiversity. That is no longer the appropriate policy objective. The Environment Act 2021 introduced a statutory requirement for most development to deliver a minimum 10% Biodiversity Net Gain, maintained for at least 30 years. Consequently, the Local Plan should be framed positively, requiring development to contribute to the conservation, enhancement and recovery of biodiversity and the wider Nature Recovery Network rather than merely preventing biodiversity loss.

The Parish Council considers that biodiversity should be regarded as a fundamental component of sustainable development rather than a constraint to be addressed late in the design process. Ecological considerations should influence the selection of development sites, the design of layouts, the retention of existing habitats, landscape design, drainage strategies and long-term management arrangements from the earliest stages of plan-making and development.

The Local Plan should continue to apply the mitigation hierarchy, requiring applicants to avoid harm wherever possible before considering mitigation or compensation. Existing priority habitats, ancient woodland, veteran trees, species-rich grasslands, wetlands, river corridors and other irreplaceable habitats should be retained and enhanced as a first priority. Biodiversity Net Gain should never be used to justify the unnecessary loss of irreplaceable habitats or other designated ecological assets.

The Parish Council considers that the Local Plan should also strengthen the relationship between biodiversity recovery and wider environmental objectives. Biodiversity enhancement should contribute simultaneously towards climate change mitigation, climate adaptation, natural flood management, improved water quality, landscape enhancement, carbon sequestration and public health through the delivery of multifunctional green infrastructure and nature-based solutions.

Moreover, the new Plan should adopt a "where there is pain, there should be gain" approach to off-site BNG contributions in such a way that the BNG has to be delivered

at least within the same civil parish area. We were deeply concerned when a recent application in our own parish resulted in a huge amount of BNG going to another part of the County altogether.

The Durham City Neighbourhood Plan provides a strong locally distinctive framework for achieving these objectives, particularly through Policies G1 and G3, which promote the protection and enhancement of green and blue infrastructure and the creation of the Emerald Network. The Local Plan should build upon these established policies by requiring development to strengthen ecological connectivity and contribute to strategic Nature Recovery Networks rather than providing isolated habitat enhancements confined to individual development sites.

The Parish Council also considers that the recently adopted Biodiversity Supplementary Planning Document contains a substantial body of locally specific guidance that should now be incorporated into the Local Plan. In particular, the Plan should include clear policy requirements relating to the mitigation hierarchy, ecological survey standards, habitat connectivity, biodiversity enhancement, long-term habitat management, multifunctional Sustainable Drainage Systems and the integration of biodiversity within the design of new development. Given the Government's proposed reforms to Supplementary Planning Documents, it is important that these substantive policy principles become part of the statutory development plan rather than remaining solely within supporting guidance.

The policy should further require Biodiversity Net Gain to contribute, wherever possible, to strategic environmental objectives identified within the County Durham Local Nature Recovery Strategy and other locally identified priorities. Off-site biodiversity enhancements should support coherent ecological networks and landscape-scale habitat recovery rather than fragmented or isolated compensation sites.

The Parish Council also considers that biodiversity policy should recognise the close relationship between ecological recovery and the historic environment. Within Durham City, the wooded River Wear gorge, river corridors, ancient woodland and surrounding green infrastructure contribute not only to biodiversity but also to the setting and Outstanding Universal Value of the Durham Castle and Cathedral World Heritage Site. Biodiversity enhancement should therefore be planned alongside landscape, heritage and green infrastructure objectives to deliver multiple public benefits.

The policy should also require the long-term management, monitoring and maintenance of biodiversity enhancements to ensure that ecological gains are secured throughout the required management period and continue to deliver measurable improvements in biodiversity, ecological resilience and ecosystem services.

Question 97: Do you agree or disagree that the Local Plan should include a policy on trees and hedgerows?

Strongly agree

Question 97a: If yes, what should this policy include?

The Parish Council strongly supports the inclusion of a comprehensive Local Plan policy on trees, woodland and hedgerows. However, the policy should go considerably further than simply repeating national policy or the existing County Durham Plan. It should incorporate the substantive development management principles currently contained within the Trees, Woodlands and Hedges Supplementary Planning Document, together

with a number of important matters raised during consultation on that document which were not ultimately reflected in the adopted SPD.

Trees, woodland and hedgerows should be recognised as essential green infrastructure and natural capital assets rather than simply landscape features. They perform a wide range of interconnected functions including biodiversity recovery, ecological connectivity, carbon sequestration, climate change adaptation, natural flood management, improved water quality, air quality improvement, urban cooling, landscape character, historic environment protection and the physical and mental wellbeing of local communities. A dedicated Local Plan policy is therefore fully justified and should complement policies relating to biodiversity, green infrastructure, flood risk and climate resilience.

The Local Plan should establish a clear hierarchy which prioritises the avoidance of harm through the retention of existing mature trees, woodland and hedgerows. Site layouts should be designed around existing landscape assets from the outset, recognising that mature trees and historic hedgerows provide environmental benefits that cannot realistically be replaced within the lifetime of a development. The policy should therefore adopt stronger wording than the current requirement that trees should be retained "where they can make a positive contribution". Instead, development should be expected to retain all existing trees, woodland and hedgerows unless their removal is clearly demonstrated to be unavoidable and the public benefits of the proposal decisively outweigh the environmental harm.

The Parish Council also considers that the Local Plan should provide enhanced protection for irreplaceable habitats including ancient woodland, ancient trees, veteran trees and species-rich historic hedgerows. Buffer zones should be clearly defined and consistently applied, with the policy providing certainty regarding how buffer distances are measured and how indirect impacts arising from construction, changes in lighting, pollution and increased recreational pressure will be addressed.

The Local Plan should also require all major developments to deliver measurable increases in tree canopy cover, woodland creation and hedgerow restoration appropriate to local landscape character. New planting should strengthen ecological networks and green infrastructure rather than comprise isolated areas of ornamental landscaping. Native species should normally be favoured, whilst recognising the need to improve long-term resilience to climate change through appropriate species selection.

The Parish Council considers that one of the most significant omissions from the adopted SPD relates to the long-term management of newly planted trees. Too often, planning permissions secure extensive tree planting but fail to ensure that those trees are adequately maintained beyond the initial establishment period. The Local Plan should therefore require developers to prepare and implement long-term Tree and Woodland Management Plans covering maintenance, watering, inspection, formative pruning, replacement of failed trees and ongoing management for a minimum period sufficient to ensure successful establishment. Where planting is to be adopted by the local authority or another public body, developers should be required to make appropriate financial provision towards future maintenance to avoid creating unfunded long-term liabilities for the public sector. This issue was raised during consultation on the SPD but has not been fully addressed and should now be incorporated into Local Plan policy.

The policy should also strengthen requirements relating to replacement planting. Replacement should not simply be undertaken on a numerical basis but should reflect the ecological, landscape and canopy value of the trees removed. Where mature trees are lost, replacement planting should provide equivalent long-term environmental

benefit through appropriate species, location, planting density and management arrangements. The objective should be to achieve a genuine increase in canopy cover across the County rather than simply replacing one tree with another irrespective of their respective environmental value.

The Parish Council further considers that the Local Plan should establish stronger expectations regarding the protection of newly planted trees. Strategic tree planting secured through planning permissions should be afforded appropriate long-term protection and should not subsequently be removed without compelling justification. The Council should also ensure that sufficient monitoring and enforcement arrangements are in place to secure compliance with approved Arboricultural Method Statements, Tree Protection Plans and landscaping schemes.

The Local Plan should recognise that woodland, trees and hedgerows make a substantial contribution to climate resilience. They intercept rainfall, reduce surface water runoff, stabilise soils, improve water quality, reduce urban heat island effects, improve air quality and sequester carbon. Tree planting and woodland expansion should therefore be integrated with policies on Sustainable Drainage Systems, natural flood management and biodiversity enhancement to maximise the delivery of multiple ecosystem services through nature-based solutions.

Within Durham City particular regard should be given to the wooded River Wear gorge and the extensive tree cover that contributes directly to the setting and Outstanding Universal Value of the Durham Castle and Cathedral World Heritage Site. Development proposals should demonstrate that they conserve and, wherever possible, enhance this distinctive treescape.

Similarly, development should contribute to the delivery of the Durham City Neighbourhood Plan's Green Infrastructure and Emerald Network policies by strengthening ecological connectivity through tree planting, woodland creation and hedgerow restoration.

The Parish Council considers that the proposed reforms to the planning system provide a compelling reason for incorporating these detailed requirements into the Local Plan itself. The Trees, Woodlands and Hedges SPD contains a substantial body of locally specific guidance which has informed development management decisions since its adoption. If the role of Supplementary Planning Documents is reduced in future, there is a real risk that this guidance will lose influence unless its substantive policy content is transferred into the statutory development plan. The new Local Plan should therefore retain and strengthen these locally distinctive requirements so that they continue to carry full development plan weight.

Moreover, the Parish Council considers that the new Local Plan should provide specific and substantially strengthened protection for ancient, veteran and historically important hedgerows. Such hedgerows should be recognised not merely as landscape features but as long-established ecological and cultural assets which may represent surviving elements of historic field systems, parish boundaries, routeways and former land uses, while simultaneously providing exceptionally important habitat and ecological connectivity.

Ancient hedgerows cannot meaningfully be recreated through conventional replacement planting. A newly planted hedge may ultimately provide valuable habitat, but it cannot reproduce the ecological complexity, established soils, veteran trees, associated flora, historic landscape significance and continuity represented by a hedgerow which has

developed over centuries. The Local Plan should therefore adopt an explicit presumption in favour of their retention in situ and protection in perpetuity, rather than treating their removal as a harm capable of being routinely offset by replacement planting elsewhere.

Development layouts should be designed around ancient and historically important hedgerows from the outset. Their retention should include sufficient undeveloped buffers to protect their roots, associated trees, ground flora, ecological function and landscape setting. Roads, accesses, utilities, drainage infrastructure, garden boundaries and other development should be positioned so as to avoid fragmentation, inappropriate severance or gradual degradation of the hedgerow.

Where an ancient or historically important hedgerow is retained as part of a development, its future protection and positive management should be secured for the lifetime of the development through appropriate planning conditions.

Question 98: Do you agree or disagree that the Local Plan should include a policy on soil conservation and management?

Neither agree nor disagree

Conserving and enhancing the historic environment

99 Do you agree or disagree that some detailed design requirements from existing Policy 44, for example in relation to archaeological surveys, should be retained in the new Local Plan, where these are not covered by the draft NPPF?

Strongly agree.

99a Please provide details of any requirements you think should or should not be carried forward:

The Parish Council strongly agrees with the requirements of Policy 44 in its current form but feel that in some cases enforcement of these does not go far enough. Greater fines and a more proactive approach would go a long way towards giving our listed buildings, Conservation Areas and designated and non-designated heritage assets more protection. We can cite 2 examples where this approach would have been helpful.

Firstly the 18th century Queens Head in Bishop Auckland Market Place. This was delisted in 2024 because of its state of disrepair and has now been demolished and a hotel is being built in its place. It would seem that the protections offered by a building being not only listed but also in a conservation area were insufficient in this case.

Secondly there is the Lych Gate leading to St Bedes graveyard on Redhills Lane. This is a non-designated heritage asset within the curtilage of a listed building (Bede Lodge) and is scheduled for demolition in the near future because of its state of disrepair. The call for non-designated heritage assets produced a long list of additions laid out in the NDHA SPD of 2025, this is the sort of exercise that needs to be carried out periodically to enthuse the public and raise the profile of our heritage.

Moving on to the archaeological surveys. In our view the provision for these is not stringent enough. Any development site should at the very least have a geophysical survey and any anomalies investigated. There is also a case to be made for a metal detecting survey. Our county has a rich and varied historic past dating back to neolithic

times up to and including our industrial heritage. Any site put forward for development needs investigating before its history is lost for ever.

The City of Durham Parish Council considers that the replacement historic environment policy should also provide particularly robust protection for the Battle of Neville's Cross Registered Battlefield and the wider landscape within which the battle, its antecedent military movements and subsequent pursuit took place. The Parish Council is concerned that reliance upon the boundary of the presently Registered Battlefield alone could result in archaeological evidence of national importance outside that boundary being inadequately identified or protected.

The Battle of Neville's Cross is one of the most important medieval battlefields in northern England. Historic England identifies the site as Registered Battlefield NHLE 1000024, registered because of its special historic interest. Its significance derives not simply from the location of the principal engagement but from the relationship between the battlefield, its topography and the wider landscape through which the opposing armies approached, deployed, fought, fled and pursued one another.

The Parish Council considers it essential that the new Local Plan recognises that the Registered Battlefield boundary is not synonymous with the maximum extent of archaeological potential associated with the battle.

There is compelling evidence for this distinction in Historic England's own underlying battlefield assessment. The 1995 English Heritage Battlefield Report explains that the Scottish army camped at Beaurepaire/Bearpark on 16 October before advancing towards Neville's Cross, while the English army approached from Auckland through Merrington. The report concludes that the directions from which the armies approached are known and uses those movements, together with the topography, to reconstruct the probable disposition of the armies.

The same assessment records that the Scots advanced south-eastwards from Bearpark towards Redhills and became increasingly funnelled between the River Browney and the steep slopes bordering Crossgate Moor. It identifies the ravine near Arbour House as a feature which would have further constrained the Scottish advance and describes how the terrain influenced the course of the battle.

These movements are archaeologically significant. Military activity does not begin and end at an administrative designation line. The archaeological resource potentially associated with a medieval battle can include not merely the location at which the principal formations engaged but approach routes, preliminary skirmishing, deployment areas, camps, areas of retreat and pursuit, casualty concentrations, artefact scatters and locations associated with individual episodes of fighting and capture.

That distinction is expressly recognised in the Historic England battlefield report itself. In defining the registered battlefield area, the report states that:

"The battlefield area boundary defines the outer reasonable limit of the battle"

taking account of the initial positions and focal area of fighting. Crucially, however, it immediately explains that the boundary "does not include areas over which fighting took place subsequent to the main battle."

That is a highly significant qualification. It demonstrates that land outside the Registered Battlefield boundary cannot properly be assumed to have no archaeological relationship with the battle merely because it falls beyond the designation.

Indeed, the historic evidence indicates that military activity extended substantially beyond the presently registered area. The English Heritage assessment discusses a contemporary account from Prior Fossor which describes the battle as taking place on Bearpark Moor between Durham and Findon Hill. While the report considers that description difficult to reconcile with the evidence for the location of the principal engagement, it concludes that the account may relate to the extent of the pursuit following the battle, noting that Fossor describes the battle as ending at Findon Hill.

The Battlefields Trust similarly states that the final phases of the action extended for several miles towards Findon Hill as the defeated Scottish forces were pursued.

There is therefore a clear evidential basis for distinguishing between the registered core battlefield and the wider battlefield landscape and archaeological zone.

There is an additional and particularly important reason for adopting a precautionary approach.

The Battlefields Trust currently records that its entry for Neville's Cross is under review because recent academic work has suggested that the battle may have been fought to the north of the currently Registered Battlefield.

The Trust has previously raised precisely this issue in a planning context. In responding to proposals for a western relief road, it noted that although the proposed road lay north of the Registered Battlefield, recent academic research suggested that the registered area might not correctly encompass the battlefield and that the battle could have taken place further north. The Trust therefore asked Historic England to consider extending the registration and sought a detailed battlefield survey before decisions were taken concerning the road.

This is directly relevant to the preparation of the new County Durham Local Plan. It would be inappropriate for the site-allocation or development-management process to proceed on the assumption that land outside the existing Registered Battlefield boundary is unconstrained merely because it is not presently designated. The available evidence indicates that the archaeological potential of the wider landscape remains capable of refinement as archaeological and historical research develops.

The Battlefields Trust contextual map supplied to the Parish Council further illustrates the issue. The mapped Registered Battlefield comprises a relatively tightly drawn area west of Durham, whereas the documented military landscape encompasses Bearpark to the north-west, the approaches towards Neville's Cross and the much wider surrounding landscape. The designation should therefore be understood as the nationally registered core of a substantially broader historic military landscape, not as a line beyond which archaeological interest necessarily ceases.

The Parish Council therefore considers that the new Local Plan should establish an explicit policy requirement for the wider setting and archaeological landscape of the Battle of Neville's Cross.

The policy should make clear that development outside the Registered Battlefield boundary will require archaeological assessment where there is reasonable evidence

that the land may have formed part of the battlefield landscape, including army approach routes, deployment areas, areas of fighting, retreat or pursuit, encampments or other associated military activity.

This would not amount to treating the entire surrounding landscape as though it were itself a Registered Battlefield. The distinction between designated and non-designated heritage assets must be maintained. Rather, it would recognise the entirely orthodox planning principle that archaeological significance does not depend upon whether an archaeological asset has already been designated or even discovered.

The Parish Council considers that the Local Plan evidence base should therefore identify a Battle of Neville's Cross Archaeological Safeguarding Area or wider battlefield study area, informed by the Historic Environment Record, Historic England's battlefield assessment, the work of the Battlefields Trust, historic mapping, documentary sources, topographical analysis, LiDAR where appropriate and contemporary archaeological research.

Question 100: Do you agree or disagree that the Local Plan should take a positive approach to conserving and enhancing the Outstanding Universal Value of the World Heritage Site, in line with national policy?

Strongly agree

Question 100a: Please tell us more about your views, including any elements that should or should not be included

The phrases "outstanding universal value" and "World Heritage" should be a clue as to the importance of Durham City's peninsula as one of 1248 WH sites spread across 170 countries. In our view not enough attention is paid to the views in and out of the cathedral and castle. At least one coming down Framwellgate Peth has already been lost and others are under threat. There is also a case to be made for extending the WHS to encompass the medieval city and riverbanks. This would give it greater protection than it already enjoys.