

Comment Receipt

Event Name	County Durham Plan Pre-Submission Draft
Comment by	The City of Durham Trust (Mr John Lowe - 440609)
Comment ID	817
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Consultation Point	1 Introduction (View)
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Q1

Do you consider that this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant and Sound?

(Please note the considerations in relation to the Local Plan being 'Legally and Procedurally Compliant' (Please see guidance notes).

(Please select one answer for each question)

Legally and Procedurally Compliant No (Go to Q3)

Sound No (Go to Q3)

Q3

Why do you consider that this Policy/Proposal of the Pre-Submission Draft Local Plan is not Legally & Procedurally Compliant or sound? (Please select all that apply)

- . Positively Prepared
- . Justified
- . Consistent with national policy

Q4

If you do not consider this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant or Sound please use this box to explain why. Please note your representation should cover all the information, evidence and supporting information necessary to support/justify the representation as there is no opportunity to submit further representations unless requested to do so by the Inspector, based on the matters he/she identifies for examination.

Paragraph 1.4 states that "The list of policies that the council considers to be strategic are set out in Appendix A."

Appendix A, as amended by the Addendum in the printed copy, lists those strategic policies without any explanation as to why they are deemed to be strategic, or why the other policies are deemed to be non-strategic. Nor could we find any explanations in the individual policies or their supporting text.

This means that the list of strategic policies is **not justified**.

The fact that the version of the Pre-Submission Draft that was put to Cabinet and subsequently printed included every policy as being strategic leads is to infer that Appendix A was **not positively prepared**.

Paragraph 21 of the NPPF sets criteria for designating a policy as strategic. Without any explanations it is impossible to assess conformity with this paragraph. Some policies, for example 21 Non-Strategic Green Belt Amendments, do not fit the criteria set out in paragraphs 20 to 24 of the NPPF. We therefore conclude that Appendix A is **not consistent with national policy**. Our comments on individual policies will point out further examples.

Q5

What change(s) do you consider necessary to make this policy/proposal of the Pre-Submission Draft Plan Legally & Procedurally Compliant and Sound?

Provide information setting out the criteria that were used to decide whether or not a policy is strategic, and showing how these criteria were applied to each of the policies and the resultant conclusion.

Q6

Do you wish to participate in the Examination in Public? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the Examination). Yes

Q7

Do you want to be informed of the following:

The submission of the Local Plan to the Secretary of State? Yes

The publication the Inspector report? Yes

Consultation on any Main Modifications? Yes

The adoption of the County Durham Plan? Yes