

## Comment Receipt

<b>Event Name</b>	County Durham Plan Pre-Submission Draft
<b>Comment by</b>	The City of Durham Trust (Mr John Lowe - 440609)
<b>Comment ID</b>	728
<b>Response Date</b>	06/03/19 19:06
<b>Consultation Point</b>	Policy 46 Durham Castle and Cathedral World Heritage Site ( <a href="#">View</a> )
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

### 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** Yes (Go to Q2)

**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
- . Effective

### 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.

This is a Policy which the Trust very much welcomes as a whole. We are pleased that our comments at the *Preferred Options* stage, that it was generic and not specific to Durham, have been taken on board.

There is just one aspect that has been overlooked, which cause us to conclude that this Policy has **not been positively prepared**. This is that it does not anticipate the probable extension of the Site. This omission could also mean that the policy will **not be as effective as it might be**.

It is possible that the extension will be accepted before the County Plan is finalised, since UNESCO has already signified that it will accept in principle the extension as a 'minor modification'. Our answer to Q5 anticipates this possibility.

#### Q5

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

We propose that a new paragraph be inserted between 5.479 and 5.480, to read

The current WHS Management Plan recommends an enlargement of the Site, with the new boundary drawn along the rim of the outer bank between Elvet and Framwellgate Bridges. The extension has been accepted in principle as a 'minor modification' by UNESCO. This is welcomed, and this Policy will apply to the enlarged Site when that is officially registered. In the interim any proposals which would prejudice the enlargement will be refused."

Should the enlargement take place before the County Durham Plan is finalised this addition will not be necessary but the Durham City map in the Policies Maps will need to be amended to show the revised boundary.

#### 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