

Cassop-cum-Quarrington Neighbourhood Plan

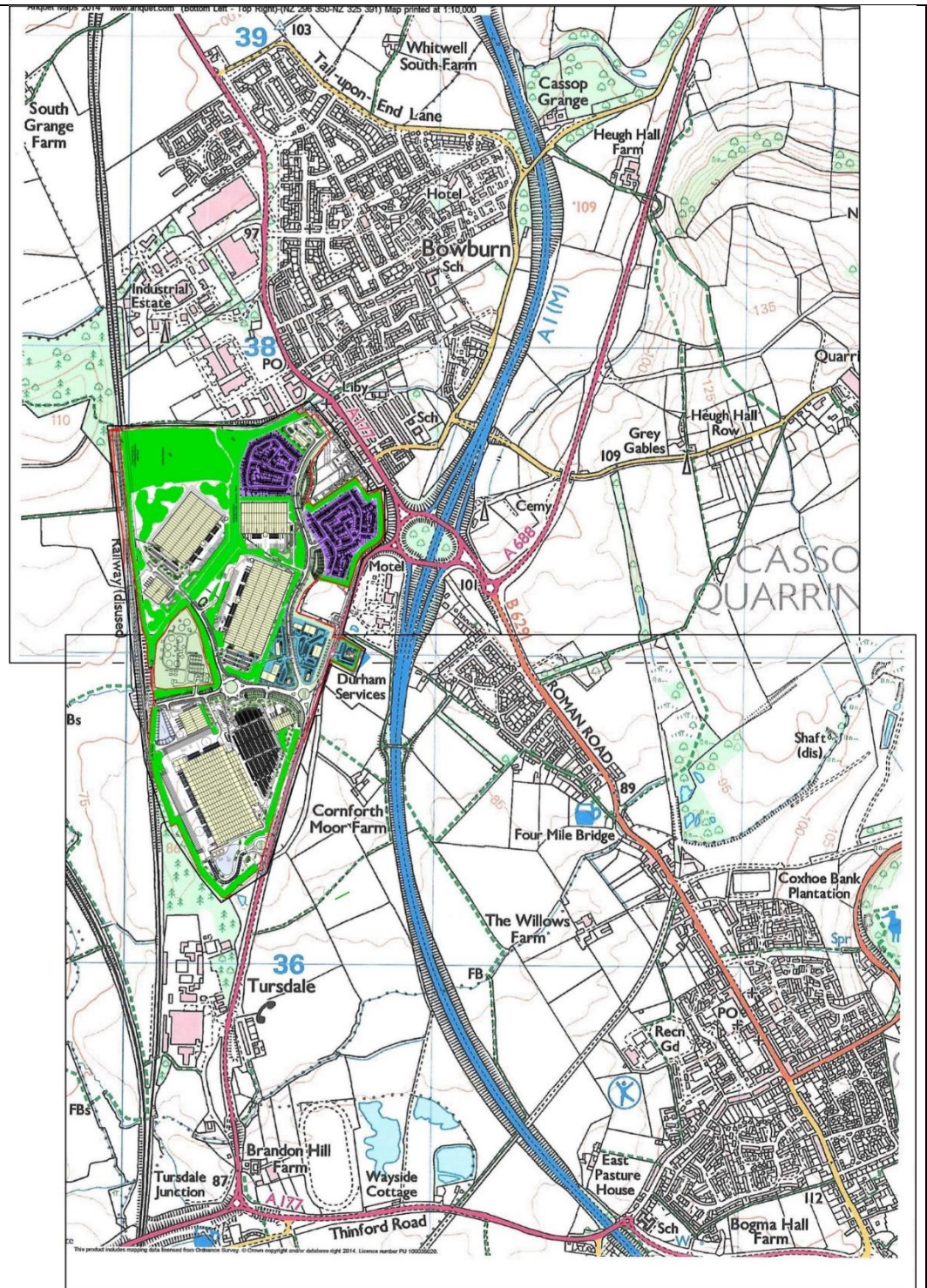
Reg.16 Consultation Responses

Representations received by Durham County Council as part of Regulation 16 Submission Draft publication and submitted to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Agent/ Contact	Organisation Details	Comments
Jules Brown	Historic England	<p>Historic England made a number of comments in relation to the pre-submission draft plan in September 2020. We are pleased these have been taken into account and we have no further comments to make.</p> <p>Regarding your request for us to comment on whether we agree that the plan does not need Strategic Environmental Assessment (SEA), we wrote in September 2020 to agree with this and our opinion has not changed. Within the areas of interest to Historic England, the plan does not need SEA.</p>
Stuart Dunn	Councillor	<p>I have closely followed the progress of this Neighbourhood Plan. It details well the concerns and views of the community and their views on development in and around these areas.</p> <p>I fully support it, and commend the Parish Council for the amount of work that has gone into its production. I hope and trust that the County Council and the Planning Inspector support it as I am sure the residents will at referendum.</p>
Louise Tait	Environment Agency	<p>We do not wish to make any additional comments on the neighbourhood plan further to our previous comments dated 24 July 2020. However, we do wish to make the following comment in respect of the Strategic Environmental Assessment (SEA) screening report for this neighbourhood plan, dated November 2020.</p> <p>Strategic Environmental Assessment (SEA) We can confirm that in relation to those matters within our remit, we do not think that there are any environmental impacts which will be so significant to require an SEA.</p>
Cameron Chandler	Natural England	<p>Screening Request - Habitats Regulations Assessment (HRA)</p> <p>Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened Cassop-cum-Quarrington Neighbourhood Plan to check for the likelihood of significant effects on European sites. The Pre-Submission Draft screening report (March 2020) concluded that as the Plan “does not allocate land for development” and “policies within the plan will not lead to built development” it “will not incur likely significant effects to Natura 2000 Sites.” As such “Appropriate Assessment is not required” (as the Plan will have no negative effects on the relevant Natura 2000 sites and the policies as drafted seek to protect the natural environment).</p> <p>Natural England agrees with the conclusions of the screening assessment, that the</p>

		<p>Plan will not adversely affect the integrity of any European or International site, and note that the Plan does not allocate land for development.</p> <p>Screening Request: Strategic Environmental Assessment It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>Natural England agree with the conclusion of the SEA screening report.</p> <p>Natural England have the following comments on this neighbourhood plan: In line with our previous comments in regards to this Neighbourhood Plan (14 September 2020), we do not have any objections to the Cassop-cum-Quarrington Neighbourhood Plan, and generally welcome and support its environmental aspirations.</p> <p>Policy CCQ1: Protected Rural Settings and Policy CCQ2: Local Green Spaces We support the inclusion of these policies within the Neighbourhood Plan, which aim to protect Local Green Spaces from built development, and where possible, enhance the Protected Rural Setting.</p> <p>Policy CCQ4: Achieving Beautiful and Successful Development We support and welcome this policy, which specifically references the need to enhance and support biodiversity. You may wish to include in this policy, to ask all developments to achieve a net gain for biodiversity and to show how ‘a minimum of 10% biodiversity net gain will be achieved’</p> <p>In the Defra 25 Year Environment Plan, the Government has committed to making sure the existing requirements for net gain for biodiversity in national planning policy are strengthened and the current trend of biodiversity loss is halted. Net biodiversity gain ensures that all residual losses from a development are accounted for and addressed. Please find additional advice [provided], for information regarding Biodiversity Net Gain and wider environmental gains that can be afforded through development plan policies.</p> <p>The lack of further comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.</p>
Clare Llewelyn	Coxhoe Parish Council (Clerk)	Coxhoe Parish Council strongly endorses the Cassop-cum-Quarrington Neighbourhood Plan proposal, and indeed is looking to do similar in its own parish. The Parish Council supports the proposals for the Cassop-cum-Quarrington Neighbourhood Plan.
Gerry Jones	Landowner/ Interest	Although the Local Neighbourhood Plan has been in consideration for over four years and is currently in final consultation stage, there has been a significant change during this time in the nature of the local area by the granting of planning consent in 2018 for the large scale Integra 61 commercial and housing development on a 42.64Hectare (105 acre) site immediately to the south of Bowburn on the West of the A688 main road and it is noted that currently this is in the course of being developed with the new gigantic (aprox 4 storey height) Amazon distribution centre already built and in operation and with numerous other future warehouse and commercial sites yet to be constructed. It is noted that the site has a potential for more than 4000 new employees and unless they are housed locally as suggested in the new Durham Local Plan, it will result in major increase in traffic in the wider area which will converge on

		<p>the Junction 61 roundabout off the motorway and although there has been some junction improvements to the roundabout, it will still result in significant air pollution around the junction and increase in noise and disturbance.</p> <p>It will be seen from Drawing No. 211 attached that the Integra 61 development site area is almost as big as the whole of the existing built area of Bowburn and it represents a significant increase in the built environment of the local Bowburn area but as it already has consent, there is no action which can be taken over the types and uses of the development.</p> <p>The new Durham Local Plan also outlines in Policy 2 for another major significant development site of 61.95 Ha (153 acres) situated within the Neighbourhood Plan area which is Safeguarded for future commercial and employment uses beyond the current plan timescale. This land is the triangle of land immediately West of the Integra 61 site and between the Leaming Branch line and the Main line rail link and covering an area even greater than the Integra 61 which will generate a further large expansion in employment in the area with a possible further 5000 plus employees all of whom will require housing within a reasonable and preferably local distance of their employment. It is presumed that access to this future site will be through the present Integra 61 development by way of a bridge over the Leamside line and will increase traffic flows through the Motorway roundabout junction 61.</p>
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However the current Integra 61 development will impose a significant impact on several aspects of the local area including traffic increase and noise and air pollution, lack of local housing for the potential 4000 new employees of the site when complete and the significant impact on the rural scene of the area due to the height and mass of the buildings.

These impacts can be mitigated with some degree of success by looking at alternative ways to reduce their affects on the local area and residents.

The increase in traffic from the Integra 61 site using the A688 and the A1(M) and its junction 61 will result (and has already) in increased noise and traffic pollution in the local area (in spite of the recent improvement works to the junction and feeder roads) due not only to the large increase of freight traffic to the units but also from the large numbers of employees of the various occupiers travelling fairly long distances to the site from their homes which is a result of a lack of suitable and affordable homes in the

immediate local area.

The extent of this traffic can be seen from the aerial views of the site on the Integra 61 website which shows the new Amazon carpark almost full of cars and as this car park is over three acres in size it indicates the potential future extent of additional traffic generated by the site. Amazon currently has over 1000 employees and they are still recruiting more but this only represent a quarter of the expected 4000 employees in the Integra 61 site once the whole development is complete and together with the additional traffic from the other commercial uses and the residential houses will contribute to significant pollution spreading around the local area. There is also the future potential of significant traffic increase if the safeguarded employment land to the west of the Leeming side line is brought into use.

In order to mitigate the extent of traffic generation, the new Durham Local Plan encourages employment developments to seek to minimise the number of road journeys created by business and industry and to provide opportunities to allow for employees to live locally to their place of employment so they can walk or cycle to work, but even with the large number of houses currently approved for the Integra 61 site (and the additional 40 houses on the recently approved adjacent infill site) it will in no way be sufficient for more than a small proportion of employees to be housed locally to their work if they are employed at Integra 61.

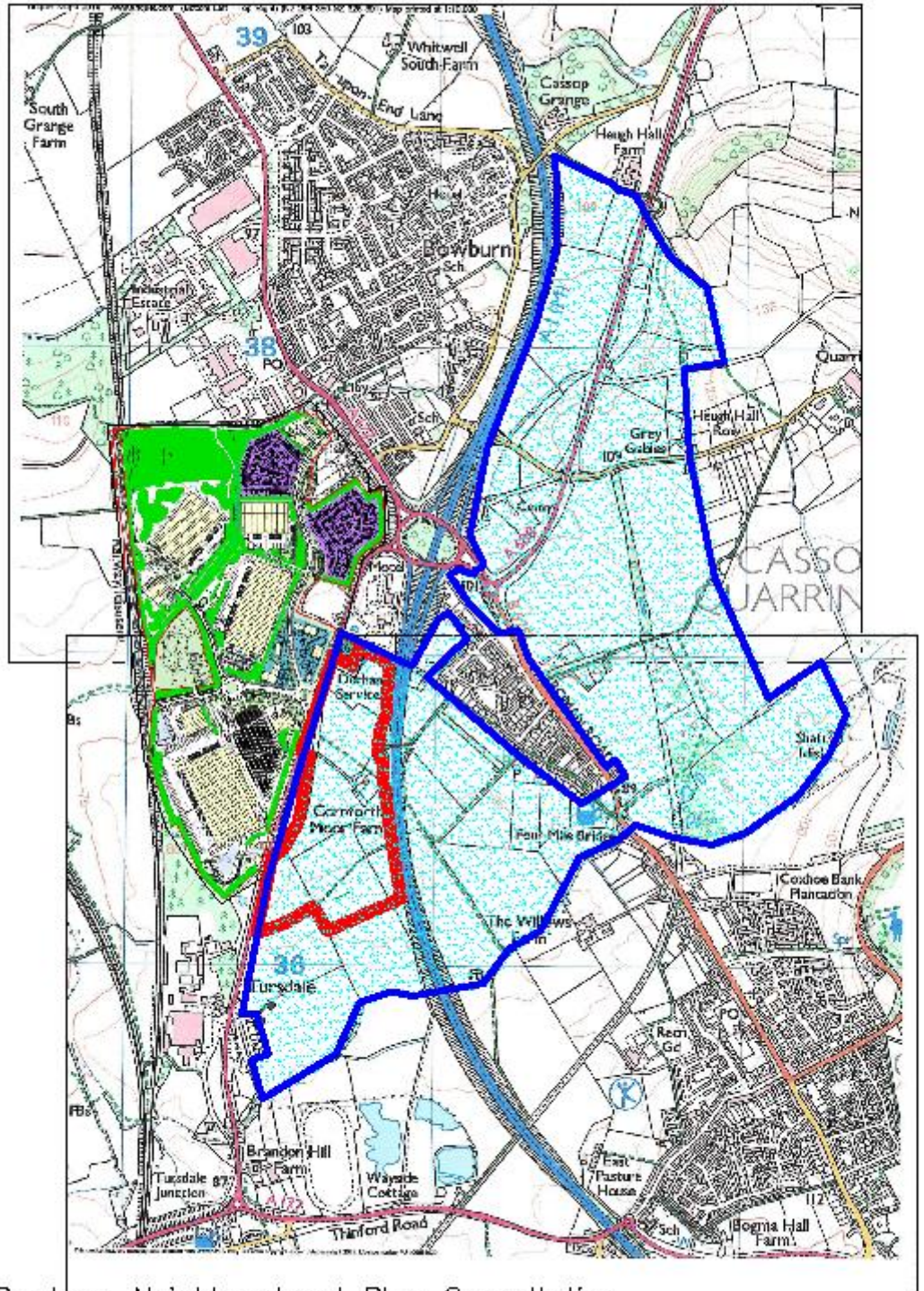
It is also noted that the new housing on the Integra 61 site has no inclusion for affordable homes and many of the houses may be out of reach pricewise of many of the potential employees of the Integra 61 development. The proposal put forward on Drawing No. 214 attached is for additional hosing on the red outlined site which would provide over 500 additional homes and it would be proposed that a significant proportion would be affordable homes or one or two bedroom flats in low rise small blocks which again would be in the affordable bracket.

The additional housing proposed on the red edged land would allow residents to walk or cycle to work and reduce future pollution and although undesirable in some ways, this new housing will provide increased economic activity to the local businesses and provide additional Council tax income locally to support local parish needs, rather than benefit areas away from the local area if employees live a long way away.

It is noted that the new Durham Local Plan shows the red edged land as being unsuitable for housing and it is marked in red on the future housing allocations plan but this assessment was not based on the information provided by the landowners representative when suitable sites for housing were requested by the Council to be provided under the SHLAA assessment criteria but was based on incorrect information that was inserted by the Council in the SHLAA application form documents provided to the SHLAA assessors. This incorrect information resulted in the site being rejected by the assessors at first hand at the very initial stage before it was given any considered by the SHLAA assessment panel and this fact was notified to the Council and the Planning Inspector at every stage of the Durham Local Plan consultations but the representations made were ignored at each stage and the assessment is still considered as incorrect and should be overturned for the reasons above.

Within the current proposals for the Neighbourhood Plan it is noted that a large area around Bowburn has been proposed of Protected Rural Setting land and that there should also be a separation of green spaces between each of the various settlement areas within the parish and this is welcomed but it should be appreciated that the fairly narrow area of land outlined in red on Drawing No 212 which is sandwiched between the motorway A(1)M and the new Integra 61 commercial development site is not of economic agricultural use as the farmers' fields have previously been divided into smaller fields by the construction of the A(1)M motorway and also by the

straightening of the A688 road and with the construction of the new commercial site to the west, it has therefore lost the majority of its rural nature and it will now be subject to extensive pressure for future development by either extending the commercial uses right up to the edge of the motorway or alternatively by extending housing development to this land. If allocated for housing it would reduce the shortfall of suitable houses for the projected numbers of expected employees on the Integra 61 site. The red outlined site is in any case fairly flat open fields with little of rural interest.

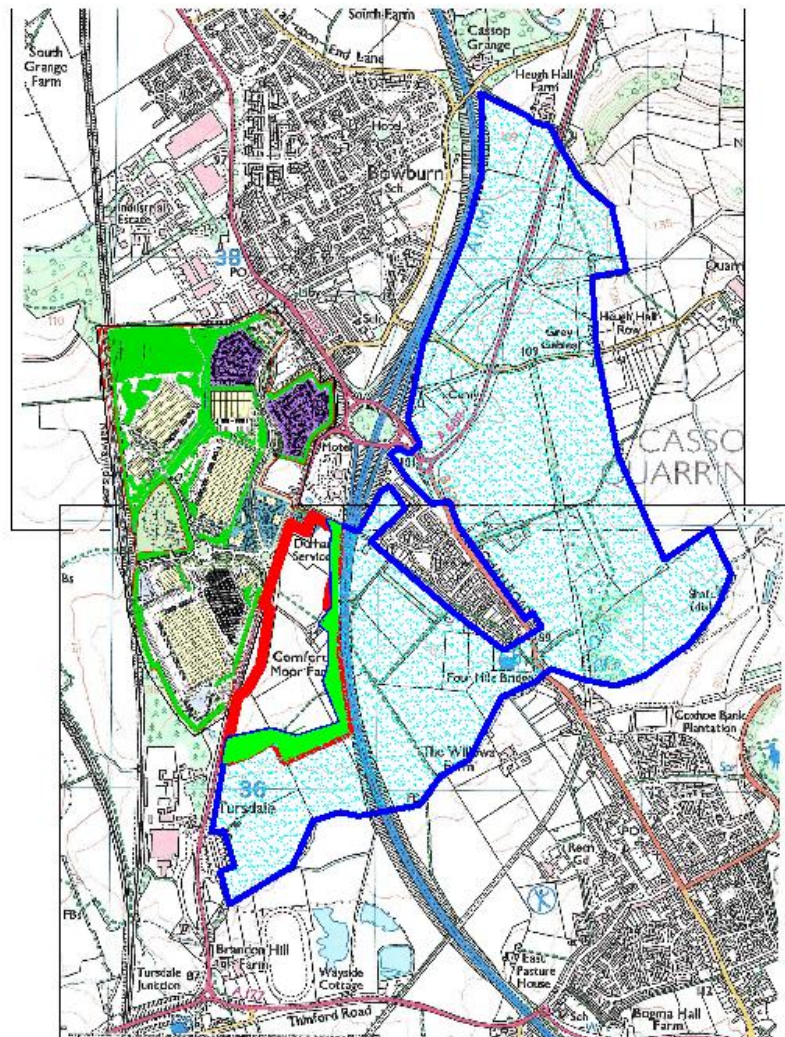


Bowburn Neighbourhood Plan Consultation
plan showing Extent of Intrgra 61 site
with proposed Protected Rural Setting

DWG.No.212

In order to mitigate the effect of the Integra 61 largescale development and to maintain a rural screening of any development constructed on land to the west of the motorway from views from the east, a tree screen could be required in any planning approval of any development and to be a minimum of 20 meters wide for the length of the boundary to the motorway and wider to the southern boundary as indicated on Drawing No. 213 attached. It will be noted that a tree screen will take several years to fully develop into a proper screen and in the meantime the commercial warehouses of Integra 61 site will be visible from vast areas to the east of the motorway. Also such a tree screen will not be planted without some form of development being approved for the site as there is no incentive for the existing farmers to plant such a screen.

Although any development on the red outlined site would impinge a small amount into the potential Protected Rural Setting area proposed in the Neighbourhood Plan, the effects are mitigated by the tree screen which will also act as a barrier to any future pressure to extend the development envelope beyond the proposed area which is all contained to the West of the motorway.

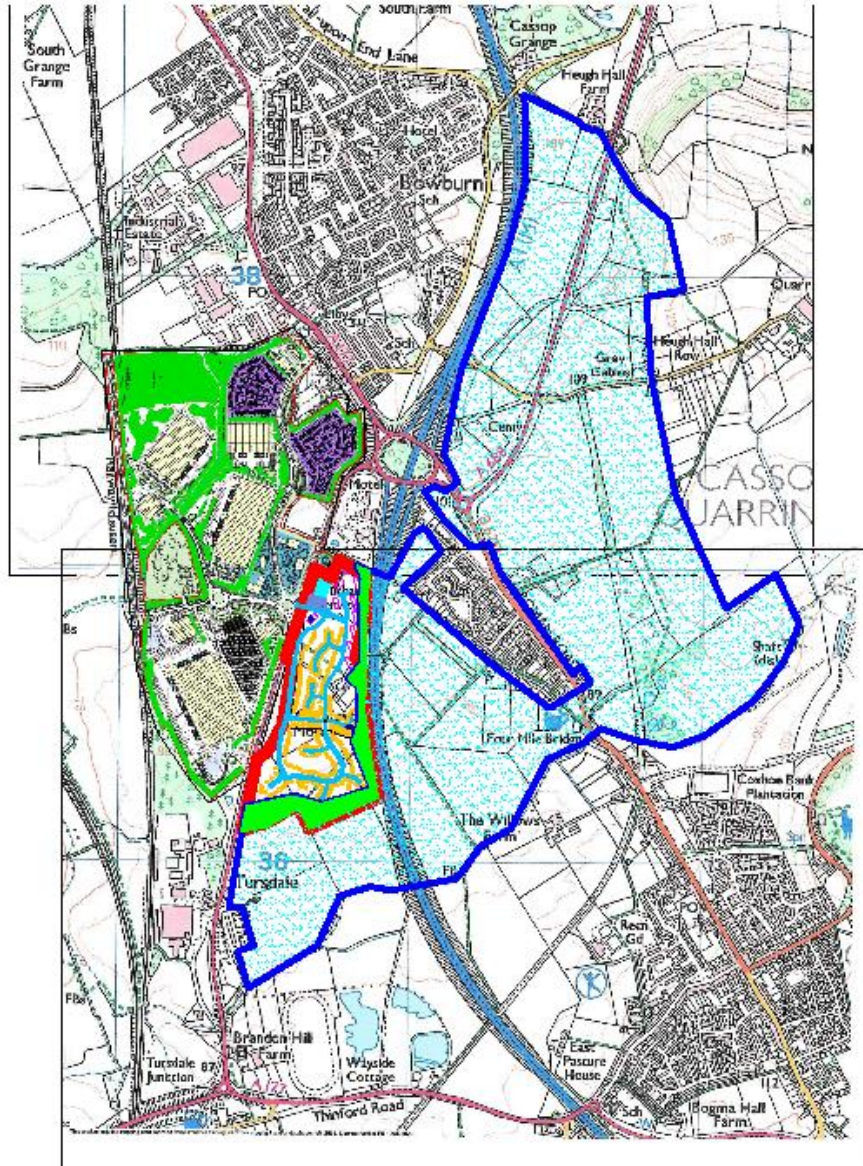


Bowburn Neighbourhood Plan Consultation
plan showing Extent of Intrgra 61 site
with adjusted Protected Rural Setting area
and proposed tree screening

DWG.No.213

It is suggested that new housing be constructed within the red edged land behind the proposed tree screen so that all development is contained to the west of the motorway and reduce pressure for new housing development elsewhere in the local

area and so that potential employees may be easily able to walk or cycle to work.



Bowburn Neighbourhood Plan Consultation

plan showing Extent of Integra 61 site
with adjusted PRS area and proposed tree screening
and indicative housing site layout.

DWG.No.214

Attached is a plan showing an indicative layout for such residential use, Drawing No 214. It would be intended that any new housing be constructed to sustainable and high quality design standards with a range of house sizes and types and with open green spaces incorporated into the design layout and with suitable open space for play areas and recreation included into the scheme. There would also be a good proportion of affordable housing incorporated into the design, including 1, 2 and 3 bedroom flats in low rise 3 storey blocks as well as low cost 2 and 3 bedroom houses. Other 3 and 4 bedroom houses would be included to provide a good mix of house sizes and types and with a potential for an additional elderly persons home within the site.

It is appreciated that the Integra 61 development has included a number of social and local needs with the inclusion of a new doctors surgery and an elderly persons home and therefore local needs are already being catered for in the locality but it is also proposed that a small Aldi or Lidl type local supermarket be provided in the north east corner (adjacent to the Integra hotel site) to provide support for the increase in

		<p>residents of the local area.</p> <p>Conclusion</p> <p>It is appreciated that the proposals for additional housing on the red edged land may be contrary to current local thinking, but it is put forward in order to reduce several of the significant major local impacts resulting from the granting of consent for the Integra 61 development including the reduction in travel distances of potential employees of the Integra 61 site with potential for them to walk or cycle to work with the consequent reduction in noise and air pollution in the local area and also to avoid the red edged land from becoming an extension in the future of the commercial uses of the Integra 61 site. The proposed tree screening could be put in place at an early date once planning consent were granted so it would reach maturity sooner and fully screen the commercial uses from view from the eastern part of the parish.</p>
Amy Hordon - Avison	National Grid	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>
Edward Boon (Agent)	On behalf of Mr A J Martin and Mrs N Martin	<p>Object to the Cassop-cum-Quarrington (CCQ) Neighbourhood Plan Submission Draft November 2020 and most notably policy CCQ1 - Protected Rural Settings due to it not being consistent with the National Planning Policy Framework (NPPF)</p> <p>The aim of a Neighbourhood Plan is to positively plan for the future of the defined neighbourhood area. A Neighbourhood Plan must not constrain the delivery of important national policy objectives. Paragraph 13 of the NPPF is clear that Neighbourhood Plans should support the delivery of strategic policies contained in local plans and spatial development strategies.</p> <p>Para 1.15 of the CCQ Neighbourhood Plan states that "in brief, the intent of the Neighbourhood Plan is that its policies will operate alongside and be complementary to the existing framework of planning policies at a national and County level."</p> <p>Para 1.17 goes on to say "Generally speaking, Neighbourhood Plans provide a particularly appropriate context for non-strategic policies as they can set out more detailed and locally relevant requirements for specific areas, sites or types of development. However, these 'must be in general conformity with the strategic policies contained in any development plan that covers their area' (NPPF footnote 16).</p> <p>The key wording to note in Para 1.17 is 'non-strategic policies'.</p> <p>Paragraph 2.49 states that "Chapter 4 of the Plan ... seeks to give a locally specific planning context to the rural settings of Bowburn and Parkhill, identifying their vital role in preventing coalescence with each other and with neighbouring settlements and putting a strong 'Protected Rural Setting' policy in place to safeguard them from being eroded. "This paragraph in planning terms clearly identifies a strategic policy issue - essentially a Green Belt designation and the policy wording of CCQ1 also uses Green Belt terminology and attempts to introduce Green Belt restrictions through a back-door approach. The County Durham Plan does not allocate the land in question as Green Belt and does not seek to impose any land use restrictions on this land.</p> <p>All policies must be consistent with the NPPF. Paragraph 99-101 states that Neighbourhood Plans can identify Local Green Spaces for protection.</p> <p>"The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves;</p>

		<p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land."</p> <p>Nowhere in the NPPF does it state that Neighbourhood Plans should identify extensive tracts of land for protection as is intended by CCQ1.</p> <p>The NPPF (page 134) also states that new green belts should only be established in exceptional circumstances. I would argue that policy CCQ1 attempts to introduce a Green Belt policy and that this is beyond the role of the Neighbourhood Plan and does not identify exceptional circumstances.</p> <p>Policy CCQ1 seeks a blanket approach to all development proposals. The policy is poorly worded and unclear as it states, "proposals for built development connected to such uses that needs to be located within PRS land will be assessed according to its impacts upon the rural character and essential roles which the PRS land plays." It then does not within the policy go on to identify uses that need to be located within PRS or to identify or define the essential role that PRS land plays.</p> <p>Paragraph 4.18 of the supporting text states "The policy conversely expresses support for uses which will help maintain and, where possible, enhance the PRS land. Such uses could include agriculture, horticulture, forestry, outdoor leisure uses, wildlife reserves and other appropriate open space uses. Essential built development associated with such uses will be considered in terms of their impacts upon the open qualities and essential roles of the PRS land." The use of the term 'open' here is a restrictive Green Belt term and is not appropriate.</p> <p>In summary, I object to policy CCQ1 as it is a strategic policy, using Green Belt restrictive terminology over large tracts of land and it is not within the remit of a Neighbourhood Plan to restrict development on this scale. Policy CCQ1 is not in line with the National Planning Policy Framework and should be removed from the plan.</p>
Melanie Lindsley	The Coal Authority	<p>The Coal Authority records indicate that within the Neighbourhood Plan area identified there are recorded risks from past coal mining activity at surface and shallow depth including; mine entries, recorded and likely unrecorded coal workings and surface mining activity.</p> <p>Having reviewed the Neighbourhood Plan it does not appear that it allocates any sites for future development and on this basis we have no specific comments to make on the document as proposed.</p>
Alex Franklin (Agent)	On behalf of Mr Joseph Priano	<p>1.0 Introduction</p> <p>These representations are made on behalf of the landowner of two parcels of land. The first is Parkhill Farm, situated immediately south east of the Bowburn Interchange, east of the A1(m). The second area of land is Willows Farm, situated south east of Parkhill Farm and south of B6291.</p>



2.0 Background

2.1 Both Parkhill and Willows Farm fall within the boundary for the Cassop Cum Quarrington Neighbourhood Plan.

2.2 The western parcel of Parkhill Farm has been considered within the Council's Strategic Housing Land Availability Assessment (SHLAA) 2019. It demonstrates that the south-western section of the land, referenced 4/BO/20, has a developable area of 1.5ha with an estimated yield of 45 dwellings.



2.3 The land at Willows Farm was not considered in the SHLAA.

3.0 Planning Policy Context

3.1 In February 2019, the Government published a revised National Planning Policy Framework (2019) and is the Government's guide to planning and development within England. The revision surpasses NPPF 2012 and 2018 and carries significant planning weight.

3.2 Paragraph 16 states that plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;
- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).

3.3 Paragraph 31 states how in the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, which should take into account relevant market signals.

3.4 Paragraph 37 addresses the examination of Neighbourhood Plans, stating they must meet certain 'basic conditions' (as set out within Schedule 4B of the Town and Country Planning Act 1990) and other legal requirements before they come into force. These are tested through an independent examination before the Neighbourhood Plan may proceed to referendum.

3.5 Schedule 4B States:

2) A draft order meets the basic conditions if—

- a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order
- c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,
- d) The making of the order contributes to the achievement of sustainable development,
- e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),
- f) The making of the order does not breach, and is otherwise compatible with, EU obligations, and
- g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

4.0 Policy CCQ1: Protected Rural Areas

4.1 The landowner strongly objects to Policy CCQ1, which does not meet the required 'basic conditions'.

4.2 Policy CCQ1 of the CCQNP is concerned with 'protecting rural settings'. Within the policy, it states how proposals within or encroaching into the PRS will not be supported where they will lead to a reduction in the rural character of the PRS or diminish the role it plays in maintaining the separateness of settlements.

4.3 In accordance with Paragraph 8 of Schedule 4B of the Town and Country Planning Act, all Neighbourhood Plans must be prepared against 'basic conditions' and must have regard to national policy and strategic policies contained within the Development Plan, in this case, the recently adopted County Durham Plan.

4.4 Upon reviewing the contents and intended impacts of Policy CCQ1, it is evident this is a policy which seeks to restrict development, or encroachment, in a similar way to Green Belt policy, which is acknowledged in both the supporting text to the policy (paragraphs 4.154.18) and the Consultation Statement (December 2020). Simply amending the wording to 'rural' while still referring to 'maintaining the separateness of settlements' make it clear that the intention of the policy is to introduce a Green Belt policy without demonstrating exceptional circumstances, as required by paragraph 135 of the NPPF.

4.5 Paragraph 133 and 134 of the NPPF states that the fundamental aim of Green Policy is to prevent urban sprawl by permanently keeping land open, “to prevent neighbouring towns merging into one another” and “to assist in safeguarding the countryside from encroachment”. However, paragraph 145 of the NPPF sets out a number of exceptions to new buildings which would not be inappropriate, including:

- a) buildings for agriculture and forestry;
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- e) limited infilling in villages;
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority

4.6 Supporting paragraph 4.18 of the CCQNP seeks to define the rural ‘uses’ that are considered acceptable, which broadly equate to parts a) and b) of paragraph 145 of the NPPF.

4.7 Policy CCQ1 therefore proposes a Green Belt type policy without even allowing for exceptions considered acceptable within the Green Belt, and can therefore be considered as more restrictive. The proposed wording of the policy therefore does not plan positively or seek opportunities to meet the development needs of the area. Furthermore, the proposed wording provides no flexibility or exceptions. The policy is therefore contrary to paragraph 11 of the NPPF.

4.8 Having further regard to the Development Plan, in accordance with the requirements of the ‘basic conditions’, it is considered that the proposed wording of Policy CCQ1 is not in general conformity with the recently adopted strategic policies. In particular, it is considered that the wording is contrary to the following strategic policies:

Policy 6 - Development on Unallocated Sites in the Built Up Area

Policy 10 - Development in the Countryside

Policy 11 - Rural Housing and Employment Exception Sites

4.9 Policy 6 in particular recognises that in addition to the development of specifically allocated sites, there will be situations where future opportunities arise for additional new development over and above that identified in the development plan for the area. This policy sets out the circumstances where such opportunities will be acceptable. This will include new build housing on suitable previously developed or greenfield sites, as well as conversions to accommodate new uses, the expansion or replacement of existing buildings, along with proposals including for example

live/work units, community facilities, leisure, specialist living accommodation, small scale retailing, employment, infrastructure and other economic generating uses.

4.10 We support the proposal not to defined settlement boundaries within the CCQNP, which, due to the close proximity to Integra 61, is well placed to support the economic development of this part of County Durham. A criteria-based approach, as set out in the County Durham Plan in policies 6 and 11, is the most appropriate way to ensure appropriate development comes forward in this part of County Durham. It is our view that Policy CCQ1 therefore fails to contribute to the achievement of sustainable development. The Basic Conditions Statement confirms that this is the case, as there are no economic policies and that social sustainability through the provision of housing to meet future needs is confined to existing housing permissions and allocations, focusing instead on the protection of the environment.

4.11 Since no justification for a Green Belt approach has been provided it is recommended that to comply with the basic conditions this policy is deleted or amended to accurately reflect strategic development plan policies 6, 10 and 11.

5.0 Policy CCQ4: Achieving Beautiful and Successful Development

5.1 Policy CCQ4 is concerned with creating development proposals which seek to deliver beautiful and successful place-making.

5.2 Paragraph 127 of the NPPF states that:

Planning policies and decisions should ensure that developments:

- a) Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) Create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

5.3 Policy CCQ4 intends to align itself with paragraph 127 of the NPPF in seeking to achieve well designed developments, yet it is unclear why the Neighbourhood plan has moved away from the wording within the NPPF.

5.4 Further explanation and justification is listed on pages 45 and 46 of the CCQNP, cross referenced against the National Design Guide, and which seeks to clarify the content of the policy and how it should be interpreted and assessed.

5.5 The wording within policy CCQ4 is highly subjective and does not align itself with that outlined in paragraph 127. Since no justification for this has been provided then it is recommended that to comply with the basic conditions this policy is deleted or amended to accurately reflect paragraph 127.

<p>Jennifer Longstaff (Agent)</p>	<p>On behalf of the Church Commissioners for England</p>	<p>As a longstanding institutional landowner in the parish, our clients have the following comments to make on the draft policies.</p> <p>Policy CCQ1 – Protected Rural Settings Draft Policy CCQ1 proposes to include rural gaps which would seek to protect the rural settings around the major built-up areas of Bowburn and Parkhill. Whilst we do not object to this policy in its entirety, it is considered that some amendments to the proposed ‘gaps’ should take place.</p> <p>Parkhill, originally part of Bowburn, is now a separate settlement, being split from the rest of Bowburn by the A1 motorway in 1968. As a separate settlement, and the second largest settlement in the Parish, it is considered important that the settlement and its community is allowed to grow throughout the plan period to meet existing and future development needs (in addition to the existing housing commitment of 190 dwelling via application DM/15/01692/OUT which covered a development need before the current development plan period).</p> <p>Future development will help support Parkhill’s existing services and facilities, such as the general shop, a public house/restaurant, garage (service, not fuel) and children’s play park along with the separate playing field and recreation ground.</p> <p>We acknowledge that the key land use issue for the Neighbourhood Plan is the growth and expansion of the larger settlements of the Parish – Bowburn and Parkhill. However, it is important for settlement to grow to be able to thrive and provide much need homes for residents who wish to remain in or move back to the area in which they consider home.</p> <p>Whilst change isn’t everyone’s preference, it is important that local need and demand is met to ensure that communities continue to prosper. Settlements need to evolve but at a rate commensurate with the settlement size.</p> <p>Furthermore, in accordance with paragraph 13 of the National Planning Policy Framework (NPPF), “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”.</p> <p>As set out in the Durham County Local Plan (and a theme that was clear through the examination process) is the inclusion of Policy 6.</p> <p>In brief, Policy 6 relates to development on unallocated (windfall) sites across the County. As part of the examination of the Local Plan, Policy 6 was subject to modifications, driven by the Inspector, in order to ensure the policy and plan was sound.</p> <p>In particular, the scope of Policy 6 was widened so that it also includes sites which fall outside of the built up area but which are well-related to a settlement (whereas upon submission, the Council’s Policy 6 only related to sites within the built up area). Subsequent modifications were also made to the assessment criteria within Policy 6. This is summarised in the following sections of the Local Plan Inspector’s Report published on 17 September 2020:</p> <p>“I deal with policy 6, which relates to development on unallocated sites, later in this report. Suffice to say at this stage that, subject to the main modifications that I recommend, policy 6 should be effective in encouraging sustainable development on unallocated sites in or well related to all of the 200 or so settlements in the county that are not restricted by Green Belt or policies in a neighbourhood plan” (IR74).</p>
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“Policy 6 allows the development of unallocated sites within the built up area provided that a number of criteria are met. Built up areas are not defined on the Policies Map. Boundaries may be defined in neighbourhood plans or otherwise a judgement would be made by the decision maker as to whether a site is “within the main body of existing built development”. Proposals relating to all sites not meeting that locational requirement would be subject to policy 10 which restricts development in the countryside. However, such an approach is not positively prepared, justified or consistent with national policy, as there are likely to be sites well-related to settlements that do not meet the policy 6 definition, but which could be developed without causing any significant harm” (IR191).

“I therefore recommend that policy 6 be modified to allow development on non-allocated sites which are either within the built up area or outside the built up area but well-related to a settlement” (IR192).

The Inspector’s conclusions were accepted by the Council and consultation on main modifications, including to Policy 6, were undertaken and informed the Inspector’s final report above. The County Durham Plan (‘CDP’) was formally adopted by the Council on 21 October 2020.

As there is a clear strategy via the CDP, it is important that the neighbourhood plan must be in general conformity with the strategic policies contained in the CDP, as set out in footnote 16 of the NPPF. Additionally, paragraph 29 of the NPPF states that “Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies”.

Our client owns land immediately south of Parkhill. It is considered that the proposed Protected Rural Setting should be amended to exclude our clients land.

The reason for this is that our clients land is at the very southern tip of the civil parish of Cassop-cumQuarrington and would provide a small scale development opportunity over the plan period to help meet local needs without significantly diminishing the gap between Parkhill and Coxhoe.



Figure 1 Location Plan of land owned by the Church Commissioners for England proposed to be excluded from the PRS as set out in the draft Neighbourhood Plan.

The current draft policy wording states that development proposals within or encroaching into the Protected Rural Settings (PRS) “will not be supported where they will lead to a reduction in the rural character of the PRS or diminish the role it plays in maintaining the separateness of settlements”.

This site is considered to be a prime site for some small scale development (in line with the CDP) and development of this site would not lead to any loss of village identity. The bend in the B6291, as well as the existing greenfield sites south of this site (outside of the Parish) would continue to establish where villages begin and end. The scale of our clients land is such that there is limited risk of Parkhill and Coxhoe merging to become one town/conurbation. Additionally, the site is a well contained / bounded field which would not lead to vast landscapes and fields vanishing. Please see figure 2 below for reference. As it currently stands the site is not suitable for agricultural workings and therefore underutilised due to its size (only suitable for grazing). It is not therefore considered to be a vital open space around Parkhill.



Figure 2 Image illustrating the well landscaped site – southern boundary bounded by existing landscaping

It is considered that the site creates the final rounding off of the development line for the south west of Parkhill.



Figure 3 Image defining a built up area of Parkhill to the south

We acknowledge the rural settings of Bowburn and Parkhill. Identifying their vital role in preventing coalescence with each other and with neighbouring settlements and putting a strong 'Protected Rural Setting' policy in place to safeguard them from being eroded is important, however, it is considered that small scale development on our client land, which would incorporate improved landscaping (on a site that is already well hidden), would actually enhance the defined physical break from the built up area

and that of the rural character of the land to the south beyond the parish boundaries, extending to Coxhoe.

We therefore respectfully suggest that the proposed Protected Rural Settings south of Parkhill excludes our clients land as identified by the red line boundaries below.

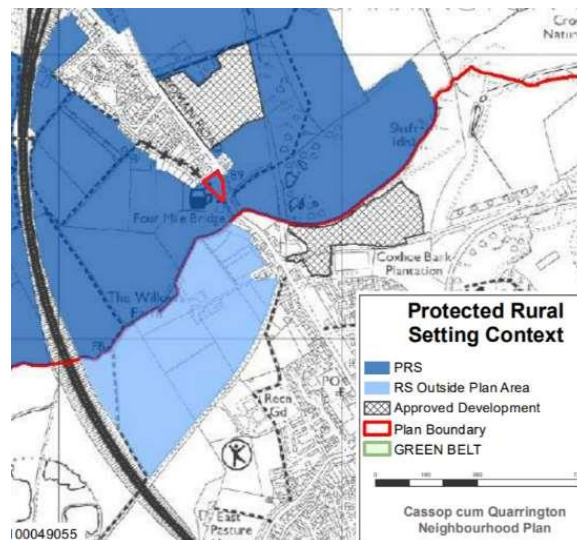


Figure 4 images setting out where it is proposed land is excluded from the PRS south of Parkhill (source – CCQ Draft Neighbourhood Plan).

Policy CCQ2 – Local Green Spaces

We note that the purpose of the environmental assets chapter and associated policies is to identify the sites and features within the environment of the Parish which are locally valued and to provide policies which apply to any development proposals affecting them.

This Policy identifies 17 sites throughout the Parish that warrant special protection. The shortlisted sites are wide and varied, ranging from roadside grass verges to parks, play areas and allotments and sites of recognised nature and wildlife value. By designating them as “Local Green Space”, they will receive protection similar to that enjoyed by Green Belt land.

We note a key area of the Plan is the opportunity to identify and protect attributes of the Parish which are valued. Specifically, these include the varied green spaces within and at the edges of its settlements, along with historic sites, features and buildings which are worthy of identification and protection.

Policy CCQ2 states that the identified Local Green Spaces “will be protected from development unless very special circumstances can be demonstrated that the development will bring direct community benefits which outweigh the harm to the Local Green Space”.

We fully understand the community seeking to identify local community spaces, such as allotments and play parks, as Local Green Spaces, however, we do have concerns of one proposed Local Green Space.

Our client objects to one of the 17 proposed Local Green Spaces - LGS11: Parkhill - Parkhill (West Hetton Lodge) Woods. Our client is the sole landowner of LGS11: Parkhill - Parkhill (West Hetton Lodge) Woods. This is private land, used as a private woodland.

As it is private land, our client wishes for this site to be excluded from Local Green Spaces as proposed in the Draft Plan. It is not considered that it has recreational value to the public in its entirety and there are concerns that if allocated as a Local Green Space this will give the opinion that the site would be opened up to the public and therefore susceptible to trespass.

Furthermore, as a managed woodland there are concerns over health and safety if trespass does occur due to the proposed new status as part of the Neighbourhood Plan. Whilst we acknowledge that there is a Bridleway that runs through the site, this is a straight route, leaving the majority of the site private and out of bounds. We do not seek to remove or divert this public right of way but there are concerns the proposed allocation will lead the public to think they can access the rest of the woodland without permission.

In accordance with paragraph 100 of the NPPF, Local Green Space designations should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.

Furthermore, paragraph 99 of the NPP confirms that designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. As the Neighbourhood plan is not proposing any allocations for small scale sustainable development over the plan period (other than referring to existing housing commitments which were granted outline consent at Parkhill in 2015 (planning application reference DM/15/01692/OUT and subsequent applications to discharge conditions) which covers a previous development plan period, it is considered that to identify so many Local Green Spaces without other allocations is not proportionate.

As this is private land, we therefore strongly object to the allocation of proposed Local Green Space LGS11: Parkhill – Parkhill (West Hetton Lodge) Woods.

Additional Comments

It is also referenced in the NPPF (paragraph 69) that neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a – identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare) suitable for housing in their area.

		<p>As no sites are proposed within the Neighbourhood Plan we would therefore like to take this opportunity to state that our client would like to work closely with the Parish Council and Local Planning Authority to help deliver small scale development on land south of Parkhill to support future development for the community of the Neighbourhood Plan period (See Figure 1 above).</p> <p>We are aware that the submission draft stage marks the final consultation before the plan will undergo examination by an independent examiner. If approved by the examiner, a referendum would then be held in the Parish to decide if it should be adopted as part of the statutory Development Plan for the area. We therefore trust that our comments above will be duly considered and the plan amended accordingly prior to it being issued to an independent examiner.</p>
Chris Martin (Agent)	On behalf of iMpeC Real Estate Ltd	<p>iMpec is a North-East based property development and investment company who deliver exceptional places for people to live, work and play. iMpec pride themselves on creating spaces that innovate the local environment, whilst maximising local economic growth and social value. They manage projects from inception to completion, and are currently engaged in a number of sites in and around County Durham, including:</p> <ul style="list-style-type: none"> • The £180m Milburngate mixed use project in Durham City; • The Fram Well, a government office building adjacent to Durham City railway station; • The Acorns, a 108-unit residential development within Spennymoor; and • Barcusclose Lane, Burnopfield, a strategic land development site providing 60 new homes in County Durham. <p>iMpeC have a number of other land holdings which are in their early phases of planning. One of these which has particular relevance to the CcQNP is a potential sustainable settlement at Quarrington, on land to the east of the A1, north of Parkhill, which falls entirely within the Neighbourhood Plan boundary. iMpeC are in the early stages of bringing this site forward.</p> <p>On 14th September 2020, Strutt & Parker submitted representations to the Parish Council on behalf of the sole landowner with regards to this land and the policies contained within the Pre-Submission Draft of the CcQNP. The letter outlined their intentions for this land in the hope that the Parish Council could consider the thoughts outlined in those comments prior to submission of the NP.</p> <p>The vision outlined in that representation remains the same: our Client wishes to promote land at Quarrington for a new, sustainable settlement offering a high-quality residential development supported by education and community provision; with strong links to the existing and proposed employment development at Integra 61, in the immediate local area. The intention is that this would be a new, standalone settlement which reflects the principles of Garden Towns and Villages.</p> <p>Our Client is therefore keen to ensure that the CcQNP is prepared in a positive and robust way, which enables sustainable development and growth to take place over the entire plan period. In order that the CcQNP is able to progress towards the being a 'made' Neighbourhood Plan (and therefore come into force as part of the wider development plan), it will be necessary for it to meet the 'Basic Conditions' and a number of other legal requirements. National planning policy in the shape of the National Planning Policy Framework (NPPF, February 2019) in paragraph 37 and footnote 21 highlight that these are contained in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended). These are also replicated in the Planning Practice Guidance (PPG) which accompanies the NPPF and are:</p>

- a. Having regard to national policies and advice contained in guidance issued by the Secretary of State.
- b. Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses. This however applies to Neighbourhood Development Orders only (and so is not applicable in this case).
- c. Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area. This however applies to Neighbourhood Development Orders only (and so is not applicable in this case).
- d. The making of the neighbourhood plan contributes to the achievement of sustainable development.
- e. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.
- f. The making of the neighbourhood plan does not breach, and is otherwise compatible with, European Union obligations.
- g. Prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.

The NPPF is also clear with regards to the overall scope of neighbourhood plans and distinguishes this from strategic policies which should be contained in local plans. Paragraph 20 lists matters relating to strategic policies as:

"...an overall strategy for the pattern, scale and quality of development, and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- c) community facilities (such as health, education and cultural infrastructure); and
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

In contrast, non-strategic policies (those which can be covered by neighbourhood plans) are outlined in paragraphs 28 – 30 of the NPPF and cover the following areas:

- Allocating sites (in accordance with strategic policies);
- The provision of infrastructure and community facilities at a local level;
- Establishing design principles;
- Conserving and enhancing the natural and historic environment; and
- Setting out other development management policies.

The rationale for this approach is that the strategic policies in local plans are subject to a more rigorous examination process compared to that of neighbourhood plans and so it is imperative that the scope of the neighbourhood plan policies flows from the strategic policies rather than the neighbourhood plan addressing strategic policies itself.

It is against this background that we provide comments on the CcQNP below.

General Comments on the Submission Draft

Our Client is very much in support of having a Neighbourhood Plan (NP) to help steer and support sustainable development in the local area. As the County Council is aware it

is the role of the NP to focus on specific, local, non-strategic issues, allowing wider matters to be dealt with via the Local Authority and in this case the adopted County Durham Plan (CDP). The CcQNP is largely successful in this as it does not seek to be prescriptive about housing, employment or other types of development. Our Client fully supports this approach.

The CcQNP accurately identifies that there is future employment growth in the local area, which will result in future pressure for new housing. It is noted in paragraphs 2.21 and 2.41 of the Submission Draft CcQNP that planning permission exists for a high quality industrial and logistics park at Integra 61, along with an element of supporting residential, retail and leisure development. In addition, the CDP safeguards 62 hectares of employment land directly to the west of Integra 61.

As noted in paragraph 2.40 of the CcQNP, the majority of the adult population travel to work outside of the Parish; initial research undertaken by our Client indicates that this is the case for the majority of the working population in Durham, with the County being a net exporter of labour. The geographical proximity of the proposed development on our Client's land at Quarrington to the employment site at Integra 61 offers an unrivalled opportunity for a local sustainable settlement that reduces the need for people to travel for work.

In addition, paragraph 2.45 of the Submission Draft confirms that "there is evidence of pressure for yet further expansion" of the existing settlements at Bowburn and Parkhill.

Our Client agrees with this, having undertaken preliminary research which indicates that additional housing, schools and community uses will be required to support the employment growth at Integra 61. In order for such development to be sustainable, it is our Client's view that it should be located in close proximity to the Integra site, but that it should not put additional pressure on existing settlements.

A separate, sustainable new settlement at Quarrington therefore offers an opportunity to both meet the aspirations of the CcQNP and to alleviate the pressure for new housing in the vicinity of the large-scale employment development at Integra 61. In meeting these needs, the proposed sustainable settlement at Quarrington would go a long way to delivering the CcQNP's Overall Vision, which is "to tangibly improve the Parish as a place to live and work".

To support the development of such a settlement in the context of the CcQNP, further more detailed comments are provided below in relation to each of the policies contained therein.

Comments on Policy CCQ1 – Protected Rural Settings

Nature of Policy CCQ1

The Objective of Policy CCQ1 is:

"To carefully manage new development to ensure that the rural setting around and between settlements is protected and enhanced".

Whilst our Client recognises the need to prevent the pressure for new housing in the locality to contribute to the erosion of the rural area between existing settlements, we cannot support and therefore object to Policy CCQ1 in its current guise as it goes beyond the objective, is not positively worded and will not facilitate sustainable growth over the plan period. Indeed, consideration should be given to whether this policy is appropriate at the Neighbourhood Plan Level. In this regard, as previously set

out, the NPPF is clear with regards to the overall scope of neighbourhood plans and distinguishes this from strategic policies which should be contained in local plans. Paragraph 20 lists matters relating to strategic policies, and includes:

"d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

In contrast and as identified earlier, non-strategic policies (those which can be covered by Neighbourhood Plans) are outlined in paragraphs 28 – 30 of the NPPF.

In proposing Protected Rural Settings, Policy CCQ1 can be seen as a landscape policy, lending itself more to strategic policies set out in the NPPF than non-strategic policies which would benefit from Neighbourhood Planning. Our Client therefore considers that it should not be included in the CcQNP in the first instance. We do not believe that the allocation of PRS in the CcQNP has regard to national advice on strategic and nonstrategic policies and as such, the designation does not meet the 'Basic Conditions' previously outlined. In particular:

a. Having regard to national policies and advice contained in guidance issued by the Secretary of State.

Aims of Policy CCQ1

Even if it were to be concluded that the CcQNP is considered to be the correct place for the PRS policy, it should be noted that a new settlement could be designed in such a way so as to not conflict with the aspiration of this policy; indeed, our Client's proposal at Quarrington is for a new, standalone settlement which reflects the principles of Garden Towns and Villages. A key design objective of this proposal is, therefore, to respect the setting of the existing nearby settlements of Bowburn, Parkhill, and Coxhoe and the undeveloped land between them, irrespective of the emerging Policy context in relation to this matter. Our Client therefore considers that it would be important to avoid coalescence with existing settlements and to preserve a largely rural setting, to enhance the potential for a high-quality development that responds positively to the local environment.

However, we consider that the extent of the proposed Protected Rural Setting (PRS) goes beyond the objective. We therefore believe that it requires reconsideration in order to avoid a situation where the potential for new development, separate to the existing settlements, is prejudiced in any way. Further detailed commentary is provided below in this regard in relation to the rationale for, and extent of, the proposed Protected Rural Setting (PRS).

Mapped extent of PRS

The areas identified as 'Rural Gaps' in the key as set out on the Symbolic Rural Gaps map at page 24, (See table 1 below for reference) are acknowledged and not contested. On this plan, the land to the east of Parkhill is not identified as forming part of a rural gap.

However, the 'Symbolic Rural Gaps' appear to have been taken forward and expanded to form part of the PRS on the Protected Rural Settings Context map at page 27. The areas forming the PRS have been significantly extended from the Symbolic Rural Gaps particularly to the east beyond the A1(M) and A688 corridor and the gap between Parkhill and Coxhoe to the south connecting this whole area as a big sweep to the east of Parkhill. The justification for this extension in landscape and visual terms is not clearly set out in the accompanying CcQNP documents. This large sweep of PRS would

serve to limit further potential development to the east of Parkhill, (a new development is currently being built out on the east side of Parkhill) but would not actually assist with maintaining the separation of the existing settlements.

Evidence base

It is noted at para 4.7 that 'urban sprawl and the need for protection of the rural settings of settlements' featured as a significant issue during the preparation of the CcQNP, with typical comments reported as relating to concerns about diminishing gaps between the settlements, intrusion into the countryside and needing to know where villages begin and end. The response to diminishing gaps and knowing where villages begin and end is consistent with the starting point of the Symbolic Rural Gaps mapping at page 24. What is less clear is the response to 'intrusion into the countryside'. For example, the east of Bowburn is contained by the A1(M) corridor which extends some metres to the east and west of the main carriageway, providing separation and containment within a green corridor adjacent to the carriageways. No landscape or visual evidence is provided as to the extent to which land beyond the A1(M) and the A688 contributes to the setting of Bowburn from within the settlement.

The photograph on page 26 shows a view, (the specific location is not identified but potentially from a local public right of way to the east of Parkhill) to Coxhoe to the south showing new housing on the edge of Coxhoe successfully contained by existing vegetation. No description of the function of this landscape as serving as part of the setting Parkhill, which is out of the shot to the west, (or to the right hand side of the photograph) is provided. This is also the case for the landscape to the north of this position, where no analysis of the extent of the rural setting of Parkhill to the north and east is provided and how the eastern edge of the PRS has been defined other than stopping to the west of the of terraced cottages at Heugh Hall Row.

In the Policy Explanation at para 4.15 the text states that the 'countryside adjacent to Bowburn and Parkhill plays a vital role in providing a rural setting to those settlements' but provides no further visual or landscape evidence to explain why and how far into the surrounding landscape this extends.

Two photographs taken from Clarence Villas on the southern gateway to Parkhill are included at P29. Whilst the northern photograph shows the new built form on the east side of Parkhill and the 'Narrowing gap' these properties are likely to have previously been read as forming part of the gateway to the settlement of Parkhill as they relate directly to development on the western side of the road when approaching from Coxhoe to the south.

The second photograph of the view to the east, (over the proposed PRS in the foreground) is interesting as the main aspect of the landscape in this view, (and having potential to contribute to the setting of the settlement) is the high ground to the south beyond the parish boundary, (marked by the unnamed watercourse in the valley bottom). Again here, there is no consistent landscape justification for this boundary other than it meets the edge of the parish boundary whereas to the north and south of the parish RS (Rural setting) is identified in light blue on the mapping where it is identified, (again without sound justification in terms of views, types or landscape character) as extending outside the parish.

In summary, the extents of the PRS as shown Protected Rural Settings Context map at page 27 cannot be justified without a more robust landscape and visual evidence base and should be scaled back to the A1(M) corridor. This would be in line with the Symbolic Rural Gaps mapping on page 24 which already serves to provide strong separation between the settlements and landscape context and containment to the east of Bowburn.

Proposed amendments to mapped extent of PRS

The broad aims of Policy CCQ1, Protected Rural Settings are acknowledged. It is understood that these aims are based on themes developed out of community consultation, linked to the development of the CcQNP and are based on strong local knowledge of the Parish and its environment by local residents and other stakeholders. However, a clear evidence base underpinned by detailed landscape assessment work to justify the extents of the policy as set out in the Protected Rural Settings Context map at page 27 has not been set out in the CcQNP nor the supporting documents on the accompanying website.

It is therefore requested that to provide a suitably robust approach in the CcQNP, the extent of the Protected Rural Setting (PRS) should be scaled back towards the A1(M) and A688 corridor to be more reflective of the Symbolic Rural Gaps Map at page 24 of the Neighbourhood Plan, the evidence for which is clear and understood. These extents would still achieve the aims of the Policy CCQ1 by providing separation between the existing settlements of Bowburn, Parkhill and Coxhoe and provide a suitable future green buffer and setting around these settlements and the proposed new settlement. At the same time, this landscape could offer a variety of uses including agriculture, horticulture, forestry, outdoor leisure uses, wildlife reserves and other open spaces in line with the aims of Policy CCQ1.

Policy wording

In addition, in order to ensure the CcQNP represents positive planning for the area and fully enables future sustainable housing growth, Policy CCQ1 should not be worded in a way which may prejudice development proposals that come forward in the local area. In this regard, the NPPF is clear that all development plans should be prepared in a positive manner, with Paragraph 15 in particular outlining that:

“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”

In seeking to prevent the coalescence of existing settlements, Policy CCQ1 as drafted states:

"Development proposals within or encroaching into the PRS will not be supported where they will lead to a reduction in the rural character of the PRS or diminish the role it plays in maintaining the separateness of settlements. Uses which maintain and, where possible, enhance the rural character of the PRS's will be encouraged. Proposals for built development connected to such uses that needs to be located within the PRS land will be assessed according to its impacts upon the rural character and essential roles which the PRS land plays".

The explanatory text in paragraph 4.18 identifies that uses which would maintain and enhance PRS land "could include agriculture, horticulture, forestry, outdoor leisure uses, wildlife reserves and other appropriate open space uses. Essential built development associated with such uses will be considered in terms of their impacts upon the open qualities and essential roles of the PRS land".

This is restrictive in terms of potential future housing development which, as previously discussed, could be delivered through a separate sustainable settlement at Quarrington rather than 'tacking on' further housing developments to the existing settlements, which the CcQNP expressly seeks to avoid (as detailed in paragraph 4.17).

We consider this current wording to be inconsistent with paragraph 15 of the NPPF. It is therefore submitted that the policy wording needs to be reviewed to ensure that any proposals for development that come forward either in, or adjacent to, the PRS, are assessed in a balanced manner, where the full benefits of a scheme (e.g., landscape enhancements, accessibility improvements within the local area, improvements to the natural environment) can be weighed appropriately against the need to maintain an element of separation between existing settlements. Our Client fully believes that an appropriately worded policy would enable a new, well designed settlement to be brought forward in line with the aspirations of the CcQNP and be consistent with national planning policy and guidance. We advocate a different policy wording (which would go alongside the reduced extent of the PRS advocated earlier):

"Development proposals within or encroaching into the PRS will be assessed on an individual basis which will weigh the benefits of the development against the need to maintain an element of separation between existing settlements (to protect their rural character)."

We would then advocate the deletion of the uses outlined in paragraph 4.18 if the CcQNP.

Making such changes to the wording of Policy CCQ1 will ensure that the NP will be a positively planned document, one that is able to provide an appropriate balance between protecting the local area but also facilitating future sustainable development around Quarrington, which will greatly enhance this part of County Durham. It will also ensure that sustainable development is not prohibited from being brought forward in this location, thus ensuring that it meets the following 'Basic Condition' previously referred to in Section 1 of this letter:

- The making of the neighbourhood plan contributes to the achievement of sustainable development.

Comments on Policy CCQ2 – Local Green Spaces

Policy CCQ2 identifies 17 sites throughout the NP area which will receive similar protections to Green Belt land. In this regard the requirements of Policy CCQ2 state:

"These sites will be protected from development unless very special circumstances can be demonstrated that the development will bring direct community benefits which outweigh the harm to the Local Green Space. Measures to enhance and improve the value and roles of Local Green Spaces will be supported. This includes small scale development which is related to the function of the Local Green Space and will not significantly diminish its values as open space".

It is noted that this is even more stringent than NPPF policy on Green Belt, which does not place a blanket restriction on all development; development types appropriate to Green Belt locations are listed in paragraphs 145 and 146. We therefore submit that the current wording of this policy is not in accordance with the Basic Conditions referred to previously in Section 1 of this letter for this reason. In particular:

- a. Having regard to national policies and advice contained in guidance issued by the Secretary of State.
- e. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.

The wording of Policy CCQ2 should therefore be amended to identify potentially appropriate development within Local Green Spaces in accordance with the NPPF, PPG and CDP.

That said, our Client understands the need for the designation and protection of Local Green Spaces and does consider that any development at Quarrington could be brought forward in a manner which is sympathetic to those identified in CcQNP Policy CCQ2. For example, part of the existing Local Wildlife Site 'LGS12 (Parkhill – Coxhoe Ponds Local Wildlife Site)' falls within the boundaries of our Client's landholdings. As this is a LWS, the intention would be to preserve and protect this location in any masterplan brought forward for development of the site. In addition, 'LGS11 (Parkhill – West Hetton Lodge Woods)' lies on land immediately to the west of the proposed settlement at Quarrington, and immediately to the east is 'LGS14 Parkhill Crow Trees Local Nature Reserve'. Our Client's intention is to develop a masterplan which is sympathetic to Park Hill Woods and Crow Trees LNR.

Comments on Policy CCQ3 – Locally Valued Heritage Assets

The former Clarence Railway lies within the site, designated in the CcQNP as 'LVHA4 Parkhill Former Clarence Railway'. Policy CCQ3 seeks to protect this as locally designated heritage asset, stating that:

"Proposals for development which will impact upon a Locally Valued Heritage Asset listed below and identified in Policies Map 3 (1 to 6) should seek to ensure the long-term conservation of the asset and avoid harm to its significance and setting. Measures to enhance and improve the significance and setting of Locally Valued Heritage Assets will be supported".

This policy approach is generally supported but on the basis that as these are non-designated heritage assets that have been identified, that they will be assessed in accordance with the policies of the NPPF which relate to such assets (paragraph 197). This is distinct from the policy tests that relate to designated heritage assets.

It is noted that this designation is within the 'LGS12 (Parkhill – Coxhoe Ponds Local Wildlife Site)'. As outlined above, our Client would seek to retain and protect this asset and to embrace it within the context of development on the site. Moreover, 'LVHA5 Crow Trees Colliery Winding Building' is immediately to the east of our Client's landholdings; our Client would seek to ensure that any masterplan that comes forward for the site is cognisant of this building and seeks to avoid any harm to its setting, looking instead to enhance it wherever possible.

Comments on Policy CCQ4 – Achieving Beautiful and Successful Development

The final Policy in the CcQNP is Policy CCQ4, which seeks to delivery beautiful and successful place making by ensuring development meets the following aims:

- "a) Development is appealing and fosters a sense of delight and wellbeing for occupants, visitors and passers-by, and
- b) Development has a positive and coherent identity and character, thereby creating or contributing to a distinct sense of place and belonging, and
- c) Development enhances the positive qualities of its site and setting and improves negative ones, and
- d) Development is efficient in terms of functionality and resource use".

It is encouraging to see that this Policy reflects the National Design Guide, and the supporting text makes reference to the emerging Model Code. It is our Client's intention to deliver a sustainable development where considerable weight can be

afforded to place-making, in keeping with the spirit of Garden Towns and Villages which the proposed settlement at Quarrington will evoke. However, we consider that point (d) should be amended in regard to the Basic Conditions for the making of a Neighbourhood Plan, as previously referred to in Section 1 of this letter. In particular:

a. Having regard to national policies and advice contained in guidance issued by the Secretary of State.

The supporting text for Policy CCQ4 states that "Development needs to demonstrate that it will 'work' well in terms of how it operates and is used and will embody materials and systems that maximise energy efficiency and minimise resource use and carbon footprint".

Such matters are largely dealt with through Building Regulations as opposed to planning policy, and there is also a need to ensure that scheme viability and deliverability is taken into consideration (and there is no evidence submitted alongside the CcQNP in this regard). In this instance, whilst our Client can see why such an approach would be desirable for the Parish Council, requesting that development must maximise energy efficiency is unrealistic, and any inclusion of energy efficiency measures should be determined based on an assessment of individual development proposals and their wider sustainability credentials. In order for the policy to meet the 'Basic Conditions', the wording of Policy CCQ4 point (d) should therefore be altered to ensure that the requirements reflect the Government's policy for national technical standards for the sustainability of buildings.

Summary and Conclusions

These representations to the CcQNP have been prepared on behalf of iMpeC Real Estate Ltd. Our Client is keen to ensure that the CcQNP is a robust document which meets the 'Basic Conditions', and which allows the area to benefit from future growth. In particular, employment growth in County Durham is forecast to remain strong, and there is a geographical preference for this to be located at Integra 61, in accordance with CDP allocations. The need for housing in this location will increase as a result, and the CcQNP rightly notes that this pressure will be felt at the edge of existing settlements, which threatens the existing rural spaces in between. Our Client's land presents an unrivalled opportunity to direct housing to a separate settlement, in close proximity to employment areas but distinct from existing development at Bowburn and Parkhill, thus facilitating the development of a new sustainable community without erosion of the rural gap between existing settlements. In addition, a new housing offer, alongside the associated infrastructure and facilities provided through a new settlement immediately adjacent to these key strategic employment locations, would be a significant draw for employers looking to locate within Durham.

Whilst our Client is generally supportive of the Neighbourhood Plan and the policies contained within it, we believe Policy CCQ1 should be reviewed in regard to the following points:

1. Consideration of whether this is in fact a strategic policy, and PRS sites should not therefore be allocated at the Neighbourhood Plan level;
2. Amendments to the PRS to reduce the spatial extent, so as not to prejudice the development of a separate settlement to alleviate the housing pressure at Bowburn and Parkhill; and
3. Amendments to the wording of Policy CCQ1 so that it is less restrictive in relation to development in the Neighbourhood Plan area.

We also believe that the wording of Policy CCQ2 and Policy CCQ4 part d) should be amended to reflect national policy in regard to Green Belt and sustainability measures

		respectively, in order to meet the Basic Conditions for the CcQNP to become a 'made' plan.
Matt Ridge	Homes England	No comments at this time
Alistair Dixon	Resident/ landowner	<p>My home and surrounding land would fall under the proposed Protected Rural Setting.</p> <p>I would like to express my disappointment and annoyance that the Neighbourhood Plan has recently come to my attention only by chance and not as a result of any communication from the Parish Council.</p> <p>I would have liked the opportunity to attend and have my say at any consultations and complete the questionnaires. Unfortunately I was not made aware of any publicity which is incredible when you bear in mind it was first suggested in 2015.</p> <p>It would have been considerate had the Parish Council contacted landowners who may be affected by any proposals but were not aware like myself of the NP.</p> <p>Having read the NP online I understand why some of the local community may be concerned that new housing developments on land between the villages within the parish if not properly managed could have an affect on the identity of each village with the threat that the rural gap would diminish and they could merge into one another ultimately feeling like a small town.</p> <p>I agree the need to keep certain areas of land rural and free from development. My own address is located on the south east corner of Park Hill Estate in close proximity to the A1M and the surrounding 6 acres of land is classed as grazing land. My argument for leaving the use of the land as it is and not Protected Rural Setting is that due to the location it would be impractical to build an estate of houses for example. There are only two ways to access which are via a track running alongside a playing field in Park Hill Estate and a farm track/bridleway accessible from the A688 and the infrastructure costs alone would make my land unappealing to any developer and ultimately a non starter.</p> <p>Even if it was practical to do so the boundary of my land does not encroach on any other estates, villages, hamlets or settlements.</p> <p>My short term plan is for the existing house to be demolished and replaced by a bungalow or such like either on the same footprint or in close proximity and a new out-house to be built which would be used for storage but again this would be replacing an existing building.</p> <p>The reason for this plan is because the existing house is in a state of disrepair and it would be more cost effective to build new.</p> <p>Longer term however I may decide to sell up and I would want a clause written in to any agreement with the new owner for a clawback in the event the new owner changes the use of the land after planning permission is approved and the land value increases as a consequence.</p> <p>This could be for a commercial business such as a riding school or a garden centre / nursery for example or even building houses but the impracticality of this would still exist.</p> <p>I understand that the procedures for planning applications are unaffected and would be considered whether the NP goes ahead or not but clearly any planning applications</p>

for this land especially long term could prove more problematic if the NP goes ahead and the land is classed as Protected Rural Setting.

In summary, although I see the benefits of a NP and share some of the existing concerns, I do not believe in my particular case that those concerns would be forthcoming, because of the location of my house and land with regards encroaching and the impracticality of building houses which means changing it to a Protected Rural Setting is unnecessary.

Further comment

The 6.5 areas of grazing land immediately south of the Junction 61 Services at Bowburn which is classed as Protected Rural Setting on the plan.

Although this piece of land has been in my family for decades it has not been farmed for several years and I now only have a vested interest in it along with another party.

Despite the land not being farmed anymore it still has great potential and is in a prime location for development being as it is just off the A1M and opposite the current Integra 61 development.

I would have thought any developers would be welcomed with open arms at the prospect of hundreds of new jobs and millions of pounds generated into the local economy especially in the current financial climate.

Having read the NP however I fear any developers will be put off taking their interest any further because of the PRS banner and could look elsewhere and the opportunity would be passed up.

I understand that any planning applications will be considered by the Council irrespective if the NP is successful or not and developers may still pursue planning but clearly if the land is under PRS this would be an additional barrier and they may feel it is a risk not worth taking which I believe would be a costly mistake.

I recognise the concerns of local people about villages losing their identity with housing developments diminishing rural gaps and villages merging into each other and of course there needs to be areas of land which remain rural and free from development.

It would be naive however to think that future housing considerations should be dismissed simply because a village 'has enough' houses and should not grow any further.

Clearly there needs to be sufficient affordable housing for a growing population and the trick is identifying and managing the areas of land where housing is needed while keeping the character of the village intact. It's a balancing act.

My land is not attached to a village with Turdale being the closest hamlet separated by fields and is an ideal location for future housing in my opinion.

It is also in an ideal position for industrial development and would be in keeping with what is already happening on the opposite side of the road and further south with Amazon and Turdale workshops and any potential developer would want to tap into this.

		<p>To sum up if the NP is passed and my land remains as PRS it would jeopardise any potential development which would bring guaranteed jobs, generate millions to the local economy and would meet the needs for housing to a growing population and for that reason I object to the plan as it currently stands.</p>
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