

Glossary

(The Inspector's report contains a number of abbreviations whose meaning may not be immediately apparent, so they are spelled out here. This was not part of the original document, which starts on the next page.)

- AHLV** Area of High Landscape Value
- CD** (followed by a number) - a reference to one of the “Core Documents” before the original Public Inquiry.
- GB** Green Belt
- LP** The City of Durham Local Plan, which was the subject of the Public Inquiry.
- P&R** Park and Ride
- PIC** (followed by a number) Proposed Inquiry Change – a suggested modification to the Local Plan arising at the Public Inquiry. It may or may not be adopted.
- PM** Proposals Map, showing the location and extent of the proposal under discussion.
- PPG** Planning Policy Guidance: rules set out by central Government on planning matters. PPG2 deals with Green Belts, PPG3 dealt with housing (and has been replaced by PPS3, a *Planning Policy Statement*).
- SoS** The Secretary of State.
- SP** Structure Plan – the County-wide plan agreed in 1999 which set out broad policies which the individual District Local Plans had to follow in setting out detailed local policies. The “SP EIP panel” refers to the public inquiry into the Structure Plan, called an “Examination in Public”.
- STW** Sewage Treatment Works

CHAPTER 3**ENVIRONMENT****Policy E1 and para 3.19****Para 3.12****Paras 3.14-3.18****Para 3.22****Durham City Green Belt****Durham City Green Belt – Boundaries****Safeguarded Land****Park and Ride and the Green Belt***Background*

1. PIC 45 would add a statement at the end of para 3.21 that inappropriate development will be permitted in the Green Belt only in very special circumstances and subject to consideration by the SoS. PIC 88 would replace the final sentence of para 3.22 with one indicating that the P & R sites identified in Policy T7 would remain within the GB and referring to the relevant current advice in PPG13 which amends that in PPG2.

*Inspector's reasoning**General Approach*

2. SP Policy 5 indicates that there shall be a GB in north Durham, south of the Tyne and Wear conurbation. It describes its general extent. Although it states that precise boundaries will be defined in Local Plans, it makes it clear that it will encircle Durham City and gives a clear general indication of its location and size. When taken together with the further illustrative guidance given by the Key Diagram this means that the scope which remains for materially different boundaries is in reality somewhat limited.
3. The fundamental purpose of this part of the North Durham GB is the protection of the setting and special character of the City of Durham. In addition it will check the unrestricted growth of the large built-up areas of Durham and Chester-le-Street, preventing their coalescence or that of the former with the villages around it, help to safeguard the countryside from encroachment, and assist in urban regeneration.
4. The setting and special character of Durham derive their importance not only from direct views of buildings on the peninsula or from the intrinsic architectural or landscape quality of the town and its setting, but from the relationship between the physical size and topography of the built-up area and the open areas around it, and the glimpses from inside and outside the built-up area of both the peninsula and open land outside the City. In essence the character of Durham does not derive solely from views of the Cathedral and Castle but from the relationship between them and the actual physical size of the built-up area. For these qualities to be preserved it will in general be necessary to prevent further outward expansion of the built-up area. An increase in the physical size of the City, irrespective of any effects on views or countryside quality, would be likely to have a generally harmful effect on the character of the City. Those fingers of open space which extend right into the built-up area are of particular importance in terms of the special character of Durham.
5. PPG3 advises that the search sequence for land for new housing should start with the re-use of previously developed land and buildings within the urban area. Subject to the various other plan policies intended to avoid harm to the character or appearance of that area, this would be unaffected by the boundaries set for the GB. Indeed it may well be likely that the tighter they are the greater will be the incentive to re-use previously developed sites.
6. The next locations to be considered in the sequence are urban extensions. However a boundary set tightly up to the existing edge of the main built-up area would be likely to limit severely the possibility of extensions to that area, not only in the Plan period but 'as far as can be seen ahead', or even 'permanently' in the words of PPG2. It would thus prevent the possibility to any material degree of safeguarding land between the main urban area and the GB to provide for longer term development needs. Such needs as could not be met within

the existing main urban area would therefore have to be met beyond the GB.

7. As most GBs are many miles wide, this would normally be a serious objection to defining a tight GB boundary. In the particular circumstances of the Durham GB, however, I would not regard it as being necessarily either unsustainable or contrary to the approach advocated in PPG3. The general extent of the GB around Durham as described in the SP is not great. As defined on the PM it is seldom more than 5 km wide and in parts is as little as about 0.8 km. Development outside such a comparatively narrow GB could still be located so as to minimise travel distances for work and leisure by being at existing or proposed public transport nodes and close to existing facilities in the larger settlements with better facilities beyond the GB. Because of this, although the SP predates the current PPG3 its GB strategy is not contrary to the general approach of the latter. I deal with the need for and location of land for development within and beyond the plan period later in this report, in particular under Policy H1, but I do this taking the existence and general extent of the GB as a basic underlying assumption.
8. Just as in general I can see no valid reason to move outwards the inner edge of the GB, I can also see no reason to extend the outer edge to, say, Brancepeth or High Pittington. Any material change in either direction should be a decision for the SP and/or RPG as it would have considerable implications for the strategic location of future development. I note concern from some objectors that the attention given to the preservation of the openness of the GB may impose a greater pressure for development on areas outside it. This is indeed an inherent risk with GB policy, but I believe that the other policies of the Plan should be capable if carefully implemented of preventing this having materially harmful consequences.
9. Although Policy E10 will protect the landscape quality of those parts of the GB that are within the Areas of High Landscape Value, it relates only to those areas, and to the protection of landscape quality rather than the prevention of all inappropriate new development. It is therefore necessary to retain both forms of protection and both Policies, as is the case also in the SP. The fundamental purpose of the GB is the preservation of the openness of the land within it. This should be apparent and inherent in determining what land should be included in the GB and in wording policies relating to such land. The complex question of the identification and preservation of countryside character is a separate concern which is dealt with in other Policies.
10. The extent of the GB shown on the PM follows closely the description in SP Policy 5(B) and the SP Key Diagram. There is little scope for any material change to what is shown on the PM whilst still maintaining the strategic purpose of the GB as set out in the SP. When considering objections relating to the inclusion of particular sites in the GB I have made use of the helpful checklists produced by participants at the GB Round Table session. In brief, and making no attempt at any general weighting of the various factors involved, I have taken into account the degree to which sites can be described as open land, the contribution, if any, that their openness makes to the setting and special character of Durham, the extent to which they fulfil other specific GB functions, and the suitability of the physical boundaries that would result from their inclusion or exclusion. I have paid attention also to any potential for development which would accord with other policies and strategies of the plan that sites might have, although in general this is unlikely to be a determining issue. Where the GB extends to the edge of the area of Chester-le-Street District Council it is desirable for the boundary shown in the present Local Plan to be consistent with that included on the Local Plan already adopted for Chester-le-Street.

The wording of Policy E1

11. The Policy states unequivocally that the construction of new buildings in the GB 'is inappropriate and will not be permitted' except for six defined classes. This follows the advice in PPG2 which states that 'inappropriate development should not be approved, except in very special circumstances'. Even if Policy E1 might perhaps be described as inflexible,

in this it is no more than following the relevant national advice. It would add nothing to the Policy to include within it any mention of it being outweighed in 'very special circumstances' or to attempt to specify what they might be. By their nature they cannot be defined in advance; to attempt to do so would merely weaken the Policy, mislead the reader, and possibly cause difficulties where genuinely unforeseen special circumstances arise. I support the addition of the words within the explanatory text proposed in PC 45.

12. Item (1) refers to 'forestry'. Whilst I appreciate the concerns of the Environment Agency over possible harmful visual effects, there is no justification in restricting this to deciduous forestry, especially as the type of planting would not be subject to planning control.
13. The words in item (2) in the list in the Policy are drawn from wording set out in para 3.4 of PPG2. To replace the words 'which preserve the openness of the Green Belt' with 'which preserve or do not harm the openness of the Green Belt' would merely add to the length of the Policy without changing its essence or making it clearer.
14. Farm diversification is mentioned neither in PPG2 nor explicitly in the Policy although it is strongly encouraged in PPG7, especially as amended in March 2001. Suitable proposals in the GB might well include the open uses of land listed in (2) or the reuse or conversion of existing buildings listed in (5), so that diversification does not necessarily have to involve a reduction in the openness of the GB. I can therefore see no inherent contradiction between PPGs 2 and 7. In view of the very small size of the GB around Durham and its consequent vulnerability I can see no reason to treat all farm diversification proposals as being automatically appropriate in the GB regardless of their nature. That would be contrary to the advice in PPG2. The subject is dealt with more explicitly under Policy EMP17 and I can see no reason for further mention to be made under the present Policy.
15. The list in para 3.4 of PPG2 of new buildings which would not be inappropriate applies nationally and is well known. To add such uses as garden centres with no more reason than to permit a less restrictive approach would have no justification in local circumstances and would be liable to cause uncertainty over the relationship between this part of the GB and others in County Durham.
16. PPG13, published in March 2001, explains the circumstances under which P & R may not be an inappropriate use in the GB. The main requirements are that alternative sites should have been assessed, especially non-GB sites, that the GB site should be the most sustainable overall, and that the purpose of including the land in the GB should not be seriously compromised. Under Policy T7 I discuss the allocated sites in relation to these considerations and conclude that they would be appropriate within the GB. PIC 88 would provide a suitable cross-reference to this.
17. It may well be that new railway stations on the Leamside line could be treated in the same manner, their locational requirements impose similar limits on where they can be sited if they are to be effective. This would also be likely to reduce dependence on the private car as a travel mode. It is however too early to be certain about the nature of the re-opened passenger line, so that adding a 7th item ('new railway stations') at this time to the list of development not inappropriate in the GB could not as yet be justified. I am not convinced that there would be any advantage in setting out in advance a full set of tests parallel to those set out in PPG13 for P & R sites. If necessary they could be treated as exceptional cases, the weight given to them depending upon the extent to which such tests had been passed. It is of course possible that the location of new stations might depend in part on their capacity to act as nodes for new development, and even if that were not the case it is possible that once they had been established such possibilities might be made use of in the longer term. These are however matters about which at best I can only speculate at this stage. In the absence of any further investigation or identification of specific sites I consider that it is prudent to regard the whole area up to the Leamside line as being land which should remain permanently open. Future changes in national guidance or regional strategy and the results of local studies might

suggest a different approach, but any of these might then be capable of amounting to the kind of exceptional circumstances justifying changes to the boundaries of the GB.

18. I deal later with their suggested modification to the inner GB boundary, but the University of Durham also want a new policy included to recognise their special position. This would indicate that proposals by them on sites within the GB may be permitted exceptionally where they are needed for University purposes, where no suitable non-GB site exists, and where the proposal would be visually acceptable. Although the University emphasise that this is not intended to imply that such proposals would be 'appropriate' GB development, I am unconvinced that this would be the case or that there would be any advantage in attempting to identify in advance what 'very special' circumstances in GB terms might be. PPG2 makes it clear that there is a presumption against 'inappropriate development' and that it should only be permitted where the harm that it would cause would be 'clearly outweighed by other considerations'. Bearing in mind the uniqueness of this presumption I would expect the latter to have to be very great indeed. The proposed policy would in effect set up a kind of intermediate stage between 'appropriate' and 'inappropriate'.
19. Although I understand that a similar approach may have been adopted elsewhere, I regard it as being most unsatisfactory here. National GB Policy is straightforward in requiring a specific demonstration of 'very special circumstances' before 'inappropriate' development can be permitted. A combination of circumstances which would lead to a proposal meeting the requirements of the University's proposed policy might be sufficient to do this, but that would not necessarily always be the case. Much would depend, for instance, on the degree of importance of a particular site to the main purposes of the GB. The proposed policy would be contrary to the advice in PPG2 and would tend to weaken the protection given to land in the GB.

INDIVIDUAL SITES

Auton Stile reservoir

20. Auton Stile reservoir lies on the south side of Bearpark in the gap between it and Ushaw Moor. Northumbrian Water want it to be removed from the GB. However, although this gap is comparatively narrow in parts, its topography and the nature of the uses within it make it important as part of what is still an effective separation between the two settlements. Development here would be likely to have a seriously harmful effect on this separation. It is also part of the general area of open countryside forming this section of the GB. Its openness should be preserved by inclusion in the GB.

Barkers Haugh STW

21. I deal more generally with the treatment of STWs in the GB under Policies E2 and U8, but I deal here with the preliminary question of whether it is appropriate to include this STW in the GB.
22. Barkers Haugh is the largest STW shown within the GB, and lies alongside the river. Although it includes buildings, plant and machinery, these do not prevent the site as a whole being and being perceived as being an integral part of the open land along the Wear valley. It is separated from the main built-up area of the City by the river and by part of The Sands which, although not wide at this point, is a further open area related primarily to the more extensive area of open land extending along the valley. I consider that it is part of a particularly important area of GB in this part of the river valley. Under these circumstances I regard it as being appropriate for the STW to remain within the GB, albeit identified under Policy E2 as a major developed site, in order to prevent an increase in the effect of development on the site on the openness of this part of the GB.

Bearpark – Land opposite Aldin Grange House

23. The GB boundary in this part of Bearpark is drawn tightly around existing development. However although the objection site was included in the GB it does in fact form part of the curtilage of May House, separated from the surrounding countryside by a hedge. I share the Council's view that it should be excluded from the GB as is shown in PIC 107. Bearing in mind its relationship with the village it would be logical therefore to include it within the settlement boundary, as is also suggested in PIC 107.

Broompark -land to the east of the settlement

24. Broompark is a very small settlement lying wholly within the general extent of the GB. The objection site is an area of agricultural land adjacent to its eastern side and prominent when approached from the east. Development here would increase the impact of the existing settlement by extending it into the countryside. The few existing buildings on the site and the existing boundaries of the site would make no material difference to this. Development on the edge of a small settlement surrounded by the GB and with few facilities would be contrary to SP and national strategy in terms of sustainability and of the aims of the GB. The narrowness of the latter makes it all the more important to preserve its openness if its aims are to be achieved.

Durham City - Land at Bent House Lane

25. This objection relates to an area of farmland between Bent House Lane, the A181 and the A1(M). Although this area clearly lies within the general extent of the GB, the impact of development here would be limited by the existing development on two sides of the objection site and by the topography of the area. I note the studies produced by the objectors showing the impact of development here from various viewpoints and at various stages in the growth of the proposed landscape screening. I accept that it would be possible for such mitigation works to reduce very greatly the harmful impact of development here. I also accept that because of the existing development and topography any impact on views of or from the Cathedral tower would be likely to be relatively small.

26. At the same time it is clear that similar arguments could be put forward in respect of development in many areas of the GB. Given the relatively small scale of this GB and the importance of the general size and scale of Durham as aspects of its character I am doubtful whether such arguments should prevail. There would certainly be some advantage if land could be removed from the inner edge of the GB to be safeguarded for potential longer term development as it would provide an opportunity for development in the longer term of sites well related to existing facilities and to public transport. However in this case the harm done to the purposes of the GB would be too great. It is an integral part of the GB and should not be deleted from it.

Durham City – land at Dunholme Close, Aykley Heads

27. Map 5 in the Local Plan resolves a contradiction between the PM and the Settlement Boundary for Durham City by showing that land between the Close and the Police offices lies within both the GB and the AHLV.

28. I am in no doubt that the major green wedges extending towards the city centre, including those along the river valley and down Flass Vale, are among the most important parts of the GB in terms of the preservation of the character and setting of the City. The objection site is linked to that running along the river valley. The former, however, is relatively narrow and has built development on three sides, and is close to that at Lilac Avenue to the north. It is essentially an open part of the settlement rather than as part of its setting and should therefore be removed from the GB.

29. The Local Plan contains many policies concerning the development of land within settlement boundaries, and I must emphasise that my view that the site does not perform material GB functions does not imply that the development of all or even of part of the site would necessarily be appropriate.

Durham City – land at Franklands Lane and Sidegate

30. PPG2 indicates that 'the most important attribute of Green Belts is their openness'. The various policies applying within them are intended to preserve that openness to achieve one or more of the purposes listed in para 1.5 of PPG2. Their boundaries should be 'carefully drawn so as not to include land which it is unnecessary to keep permanently open'.
31. Even where a GB is as comparatively narrow as is that around Durham, it is still inevitable that it will contain some existing development which is not 'appropriate' in terms of the advice in PPG2. Some may be sufficiently substantial to be treated as 'major developed sites', where Policy E2 would apply, but that does not apply in all cases. In defining the inner boundary of the GB the existing use and character of the land must be taken into account, so that as far as possible the GB would only contain land which is already open.
32. The south-eastern part of the objection site put forward by T & M Harrison contains a carpentry workshop, some disused buildings and an area used for the repair and refurbishment of gas vessels. These are all 'inappropriate' uses in the GB, and, if the site were located directly on the edge of the main built-up area I would be in no doubt that it should be excluded from the GB. That is, however, not the case. Even when account is taken of such other uses in the area as the W H Smith depot, the scrap yard, tyre depot and, largest of all, Barkers Haugh STW, I would regard them as being an enclave of 'inappropriate' uses within the GB rather than as a part of the main settlement area of Durham. Together they are surrounded with open uses – Crook Hall farm to the west, The Sands to the south, and the wider sweep of open space along the Wear valley to the north and east. The north-eastern part of the objection site is itself an open overgrown area, and although I understand that it was developed in the past that is no longer apparent. The developed parts of the objection site, parts of which are currently unused, are dominated visually by extensive vegetation on and around the site which greatly reduce any harmful effects activities on the site otherwise might have in terms of reducing the openness of the GB, even when viewed from the adjacent public footpaths.
33. Similar arguments apply to land adjacent to Sidegate which Mr Amos wants to see removed from the GB. It contains some buildings, mainly agricultural, but is essentially part of the open area which has extended along the river valley.
34. This part of the GB is one of the most important in preserving the setting and special character of Durham. Any material reduction in the openness of this part of the Wear Valley would be likely seriously to undermine that aim. Whilst I am aware of the need to avoid excessively tight GB boundaries and of the various other Plan policies controlling development outside the GB, in this instance I consider that a modification of the GB boundaries would be likely materially to reduce the effectiveness of the GB. The land was included within the settlement boundary as shown in the present adopted Local Plan but as that related to a different strategic context, I regard it of limited relevance in determining the GB boundary in the present Local Plan.

Durham City – land at Tollhouse Road, Crossgate Moor

35. Planning permission has been granted for a house on the land shown on Map 2 of the Local Plan. In view of this, and as the new GB boundary compared with that shown on the PM follows a clear existing physical boundary, I can see no valid reason to include this land in the GB.

Farewell Hall West Farm

36. I can see no justification for the exclusion from the GB of an area of open land plainly within the general extent of the GB. I deal elsewhere with farm diversification in general, and I note that appropriate GB uses include outdoor sport and recreation which may well figure amongst the possible new uses being considered for parts of this area.

Fernhill, Crossgate Moor

37. Under Policy H1 I consider how future housing needs could be provided for. The redevelopment of previously developed land within the existing built-up area will in general be the most satisfactory choice in terms of national and regional strategic guidance. In terms of sustainability the next best alternative is likely to be urban extensions, as by making use of existing facilities, including public transport, these can help to minimise travel, especially by car. The merits of this site as put forward by the objectors to a large extent derive from this. These must however be seen in the context of the identification of the GB in Policy 5 of the SP which sets out particular strategic approach for Durham. There are many sites on the edge of the City, including this one, which might otherwise be capable of making some provision for possible longer term housing development, but my primary concern is with the importance of the site to the GB. Only if that were to be very low might it be appropriate to remove it from the GB.
38. In fact in this instance I consider the GB value of the site to be very high. It lies on the western side of the A167 and although there is certainly already development on substantial lengths of this part of the road, where there are gaps they do serve to make it a firm, visually apparent and well established boundary to the main built-up area. In addition, the objection site lies between the open countryside to the west of Durham and Flass Vale, a wedge of open land projecting in towards the city centre of considerable importance to the visual character of the City. I regard the openness of the site as a connection between these areas as being of particular value in preserving the setting and character of Durham City. It certainly has some locational advantages in terms of possible residential development, but that is far outweighed by its importance to the GB, in which it should remain.

Finchale Training Centre

39. The objectors, Harbour House Farms, consider that the GB boundary should match that recommended by the Inspector considering the Chester-le-Street Local Plan. She recommended that there should be no GB east of the East Coast mainline railway before it crosses the A167. She was however concerned only with land within that LPA area and did refer elsewhere to the need set out in SP Policy 5 for the GB to encircle Durham City. I see no contradiction between her view and the inclusion of the land around the Training Centre in the GB. Indeed, I cannot see how this land could be excluded from the GB if it is to encircle Durham City and to perform other GB functions effectively.
40. The Training Centre is too small to be excluded from the GB as some settlements are, but it is rightly listed under Policy E2 which I discuss later. I discuss there whether the area thus defined should include the land put forward by the present objectors.

High Shincliffe – land at Avenue Street, east of Willow Tree Avenue

41. The objection site is an area of some 3.3 ha of agricultural land which is almost entirely bounded by development within the village except for the side bounded by the A177. The village lies between Durham City and the Leamside line and is therefore within the general extent of the GB as described in SP Policy 5. When viewed in plan form, there may seem to be a good argument to include this land within the settlement boundary as it would appear to be an open area within the village rather than part of the open countryside surrounding it. That is not however the impression that I have received from my various site visits. When viewed from within the village the site adds to its visual character and interest. More importantly, when viewed from the A177 the openness of the site greatly reduces the visual impact of the village, and thereby increases the perception of openness of this part of the GB. Even taking into account the possibility of mitigation through planting and careful layout and design, I consider that development here would have a particularly harmful effects on the apparent openness of this part of the GB. This openness, so close to Durham City, adds to the character and setting of the latter. The preservation of these qualities is one of the most important functions of the GB.

42. I note the objectors' comments as to the agricultural quality and viability of the land although it was apparently still being cultivated when I viewed it. In any event I consider that this is far outweighed by the importance of retaining this site in the GB.

High Shincliffe – land east of Whitwell Acres

43. The Leamside line provides a particularly firm and clear boundary to the GB on the eastern side of the City. This site lies between it and the existing settlement, and is an area of open countryside. Although in plan form it may appear to be logical to regard it as being part of the structure of the existing village, I do not find that to be the case when viewed on site. As it lies within the general extent of the GB I could only recommend its deletion from it if it either did not perform any apparent GB functions or because it had special suitability for potential future development. Neither of these applies, so that I recommend that it remain in the GB.

High Shincliffe – land to south of village, opposite Moor House Farm

44. I have explained above that the Leamside line provides a particularly firm and clear boundary to the GB on the eastern side of the City. If however that meant that sites making no or only very limited contribution to the GB were included, and that they could be excluded by varying the boundary, there would be no objection in principle to that.
45. That is not the case here. The objection site comprises agricultural land, probably of low quality, bounded by the existing village, the A177, a fence and trees, and the Leamside line. I accept that if it were to be included within the settlement boundary these should be sufficient to restrain further development to the south, but that in itself would not justify development on the objection site. It lies within the general expanse of the GB and is clearly open countryside at present. Its shape, location and surroundings link it much more with the latter than with the village. Especially as it lies alongside a major road, its development would be prominent and would have very strongly the character of a substantial outward expansion of the village. Even taking into account possible mitigation and the comparatively small size of the site (just over 1 ha), I regard this as being contrary to the aims of the GB. As I indicate elsewhere, there is no need for additional or alternative allocations for the present plan period, and the relatively small size of the GB means that development on the edge of the larger villages beyond it, if found necessary, could form a sustainable long term strategy. There is therefore no need to remove this site from the GB for allocation, safeguarding or because it would not fulfil GB functions.
46. I note that planning permission was refused on this site in 1997 partly due to possible highway safety problems. I am unaware of the full details of this, but if my recommendation were not accepted it would be necessary before allocation or safeguarding of the site to be satisfied that safe and adequate vehicular access could be obtained to the site.

Langley Moor – Onslow Terrace

47. Although the East Coast Main Line is the GB boundary to the north of the objection site, and the eastern boundary of existing employment development is the boundary to the south, an open field to the west of the railway of about 0.8 ha used for grazing is included in the GB. As the Council indicate, it is open and is not previously developed land, but in themselves these do not mean that the site performs GB functions. The gap between Langley Moor and Durham in this area is indeed somewhat narrow but I find it hard to regard this site as forming an integral part of it. It is simply an area of open land within this part of the built-up area, performing no obvious GB function. The boundaries shown on the PM could act as GB boundaries if I had concluded that the site should remain in the GB, but the railway line is a much firmer and more defensible boundary which should be capable of lasting in the longer term. The site should be excluded from the GB and included within the settlement boundary.
48. Any proposal for its development would therefore fall to be considered in relation to other policies of the Local Plan but I should stress that my views on its inclusion in the GB do not

mean that I believe that the site would necessarily be suitable for development. I consider under Policy H1 whether it should be allocated for residential development.

Leamside – land west of Marks Lane

49. Later in this section under 'West Rainton – land north of Marks Lane' I recommend that a substantial area of land should be removed from the GB, and that the new boundaries should be Marks Lane and Pit House Lane. A number of objectors want the boundary further reduced so as to exclude land between these two roads which they regard as having potential for development as a private site for gypsies. My concern, however, is not with the potential of the site for this purpose – it would be too small for an allocation and a proposal could be dealt with under the various relevant policies of the Local Plan – but with whether the site should be removed from the GB.
50. Although this site has been used for other purposes, including as a coal stocking yard, and there are a few buildings nearby, I do not regard this as preventing it or the surrounding area as a whole from being fundamentally open or from fulfilling GB purposes including safeguarding the countryside from encroachment. There is not sufficient development here to regard it as a settlement which should be deleted from the GB as a whole. The objection site is too small to delete on its own, and this would result in unsuitable and illogical physical boundaries. There is no case to remove a larger area, and if it were done it would be hard to find physical boundaries as clear and appropriate as those I recommend later in this section. I therefore recommend that the objection site should not be deleted from the GB.

Leamside – land north of Station Road

51. The GB boundary runs along the Leamside line, thus including this site within the GB. The objectors propose removing land from it for potential development in connection with the re-use of that line, either as a result of the proposed P & R site at Carrville or of a replaced station at Leamside itself.
52. Under Policies T6 and T7 I support the allocation of P & R sites, including that at Carrville. I also support the increased use that is intended of the Leamside line and agree that in the longer term it may well be appropriate to co-ordinate development with that increased use, but in the absence of detailed programme or proposals for the opening or re-opening of stations it would be premature to identify an otherwise arbitrarily chosen area of land which would otherwise clearly lie within the general extent of the GB.

Low Newton Farm, Low Newton

53. The objectors want land between the main built-up area and Low Newton to be excluded from the GB. Much of it is shown on the PM as being safeguarded under Policy T3 for stage 2 of the Northern By-Pass. As I explain later in considering land at Newton Grange, there is no certainty that this road will be constructed or, if it is, as to its route and detailed design. If it were to be built there would be a need to consider whether GB boundaries in that area were still appropriate, and, if they were felt not to be, it is possible that this would be sufficient to be regarded as an exceptional circumstance justifying a change to those boundaries. However given the present uncertainty over the road, I consider that the GB boundary should be established in the light of physical circumstances as they are now.
54. The main characteristic of land to be included in the GB is that it should be open, as the main function of the GB is to preserve that openness. Most of the objectors' land is open and is indeed indistinguishable in character or use from adjacent agricultural land. The exception is the area around the former farm buildings immediately south-west of Low Newton. Although part comprises a former yard, apparently little used now, there are a series of buildings, some boarded up or otherwise derelict. This area, both the buildings and the yard, is not fundamentally open and relates more to the adjacent built-up area of Low Newton than to nearby agricultural land. It should be removed from the GB.
55. Two of the three fields comprising the remainder of the objection site – those north of

Finchale Road and south of the area I recommend be removed from the GB - are no different in character or use from the wider area of agricultural land which they adjoin and which is clearly an integral part of the GB. There is no reason to treat them any differently from the latter.

56. The central field, the smallest of the three, lies between a railway embankment and Low Newton. Because of this and its narrow shape, and as it is cut off from the main area of countryside north of Finchale Road, I find it hard to regard it as performing any material GB function. In particular it is not prominent in longer distance views of Durham and it is not part of the GB's strategic purpose to maintain the small separation between Durham and Low Newton. I therefore recommend that it should be deleted from the GB and included with the Settlement Boundary. There is however no need for it to be safeguarded for possible future development as it is already subject to Policy T3 which would prevent permanent development.
57. The objectors draw attention to the likely need to expand Frankland Prison, but I have no evidence of any specific plans even in the long term which might require any of the various parts of the objection site. The exclusion of land from the GB which performs a clear GB function in order to allow for development whose nature and location is wholly speculative could not be justified.

Merryoaks

58. I deal with this site under Policy EMP4 where I conclude that it should remain in the GB.

Neville's Cross Bank

59. The Council acknowledge that the settlement and GB boundary shown on the PM is incorrect. Map 3 at the end of the Local Plan therefore shows a modification to exclude from the GB land which was within the settlement boundary on the PM of the previous Local Plan and where permission has been granted for three dwellings. One is complete and one is under construction. Mr and Mrs Nelson also want excluded from the GB a small part of their adjacent land which is fenced off from their main field to the south, and which contains a small hut once used as a stable and now as a store. Their larger building, a lambing shed and hay store, would remain in the GB.
60. Although the objectors regard the removal of this land from the GB and its subsequent development as a rounding off of the existing developed area, I believe that on the contrary it would involve a noticeable outward extension in a very prominent location. The small building on the objection site and the larger building adjacent to it are both clearly rural agricultural structures, distinct in style and size from those within the adjacent urban area. Even if the existing fence could be regarded as a satisfactory physical feature for a GB boundary, the inclusion of the site within the settlement boundary would be likely to result in an extension of urban development into the countryside. For reason that I have explained earlier, this would be contrary to the fundamental aims of the GB. Therefore, whilst I appreciate the particular wishes of the objectors to construct a dwelling close to their agricultural land, I cannot recommend that the objection site be excluded from the GB.

New Brancepeth – land at Scouts House Farm

61. The objectors want this land included in the GB to assist in preserving fields and wildlife. It is however well beyond the extent of the GB as described in SP Policy 5 which speaks of it running 'east of Bearpark and southwards to Croxdale'. I can see no special justification for this suggested extension. Other Plan policies deal with nature conservation matters. Inclusion in the GB would not be an appropriate way of ensuring that any particular nature conservation interest would be preserved.

Newton Grange, Pity Me

62. Alfred McAlpine Developments Ltd want some of the land between Finchale Road and the land shown on the PM as being safeguarded under Policy T3 for Stage 2 of the A691 Durham Northern By-pass to be removed from the GB and safeguarded for possible future residential development.
63. I agree that it would in many ways be well located for such development. Although it is obviously not previously developed land it lies on the immediate edge of existing development, close to local facilities and relatively so to the city centre, and well served by public transport. Nonetheless I am in no doubt that at present it is an integral part of the gap separating Durham and Chester-le-Street, whose protection as GB is one of its strategic aims referred to in para 7.6 of the explanatory text to SP Policy 5. The present boundary consists of roads together with hedges, trees and sufficient other open land to act overall as a logical edge to the built-up area. Whatever it may appear to be when viewed on a map, the development of this site would not seem like a logical rounding off of the built-up area; it would instead give the impression of an unconstrained outward extension, contrary to the aims of the GB.
64. As I explain under Policy T3, it will be necessary to examine in detail the anticipated benefits and potential harm of this part of the Northern By-Pass before a firm decision can be made whether or not to proceed with it. I recommend that it should continue to be safeguarded but I am by no means certain that it should or will eventually be constructed. Even if it were to be constructed, its precise route and design remain uncertain. It may be that in that event either it would be designed so well to fit in with the surrounding landscape that any development between it and the existing built-up area would still appear to be an unconstrained and illogical sprawl, or perhaps alternatively that it would be such an intrusion into the landscape that an even greater area of land could logically be developed.
65. Under these circumstances I can see no justification for removing the objection site from the GB to be safeguarded, as the acceptability or otherwise of any future development on it or even on a larger site depends entirely upon decisions about the road which may not be taken for some years. Whilst it is not appropriate to speculate with any degree of certainty about what might constitute 'exceptional circumstances' justifying the release of land from the GB, it is conceivable that the construction of a major new road on a route not known at the time that the GB boundary was established might be so regarded. In the face of such future uncertainty I conclude that the openness of the site performs a clear GB function at present and should be included in the GB so that this can continue.
66. The same argument applies even more strongly to the removal of land north of the proposed Northern By-Pass. Whilst this is certainly well located in relation to facilities and to public transport it is an area of particularly high importance in terms of the aims of the GB. Decisions as to the line of the Northern By-Pass and whether or not it should be built would be unlikely to affect this, so that I would regard this as an area which should certainly be included in the GB and where it is hard to envisage exceptional circumstances sufficient to justify its removal from it for allocation and development.

Sacriston – land at Findon Hill

67. The village of Sacriston, which lies within Chester-le-Street, has a good range of services including shops and employment as well as good public transport connections. It is one of the larger villages beyond the outer edge of the GB which may well be suitable for some of the longer-term development to the extent that greenfield sites are sought. It would therefore be desirable in principle to exclude from the GB sites on the edge of the village which might have the potential to provide for such possible longer term needs.
68. This site lies on the edge of the village, adjacent to a modern housing estate and with part of the access road to the latter running across part of it. The estate, however, runs up to the ridge which runs virtually along its boundary with the objection site. The latter then falls

away to the south-east, towards Durham City. Development on the objection site would therefore be prominent over a wide area. My colleague in an appeal in 1995 said that development here would to some extent harm the view from the Cathedral tower, and, whilst its impact on a view at such a distance is necessarily relatively small, it does give some indication of the degree of prominence that it has. Under these circumstances and bearing in mind that the site clearly lies within the general extent of the GB, I do not regard it as having sufficient potential for satisfactory development to justify its removal from the GB in order to be safeguarded for possible longer term needs.

Land at Sherburn Grange

69. The objectors want an area of some 11ha east of the A1(M) and south of Renny's Lane removed from the GB and safeguarded for potential longer term development. This is a generally flat area of arable land centred on a pumping station. It is part of the narrow gap between Durham City and Sherburn, although the development of this land on its own would not reduce the width of the narrowest part of that gap. It would however greatly reduced the perceived gap as a whole, as well as involving the loss of an area of countryside clearly within the general extent of the GB.
70. The southern boundary suggested by the objectors does not follow a clear physical feature and, if I were minded to recommend the removal of part of this land for the GB for it to be safeguarded I can see no particular reason to select this part rather than a smaller or larger slice of the gap between the two settlements. Clearly the part chosen is that closest to the main built-up area and that most influenced by that area, but its development would simply extend the latter outwards. The other main harm that would result would be from the loss of countryside and a reduction in the perceived gap between settlements.
71. I conclude earlier and under Policy H1 that the comparative narrowness of this GB greatly reduces any potentially harmful effects of the lack of safeguarded land on its inner edge. Development if necessary in the longer term on the edge of the larger settlements outside the GB could in this instance be a sustainable option. Under these circumstances, and bearing in mind the narrowness of this part of the GB, I recommend that this land should remain within the GB.

Sherburn – land at Gray Avenue

72. The gap between the eastern edge of the main built-up area of Durham City and Sherburn is one of the narrowest parts of the GB. Under these circumstances it is of particular importance to ensure that its openness is retained if a perceived coalescence of the two settlements is to be avoided. Thus, although the inclusion in the GB of the objection site and other nearby open land does result in an irregular settlement boundary for Sherburn on this side, I consider that it is necessary in order to retain a meaningful gap. A more regular boundary could easily be found, such as the Leamside line, but that would reduce the chances of achieving an important aim of the GB. The GB boundary should not be modified in this area.

Shincliffe – land at the rear of the Rose Tree PH and land west of Low Road

73. Shincliffe lies between the City and the Leamside line. As such SP Policy 5 makes it clear that it lies within the general extent of the GB. The two fields on either side of the former railway embankment are both in agricultural use and in both cases their development would extend the developed area significantly into the GB. I am aware that the garden centre on Hall Lane is included within the settlement boundary, but it does not extend so far to the west as to make development of the land west of Low Road a form of infilling or even of rounding off. I am also aware that neither site is amongst the most prominent areas of the GB and that careful and attractive planting and layout could do much to mitigate the harmful effects of development on the openness of the GB. These arguments could however apply to many areas that, like these, plainly lie within the general extent of the GB. They are not in

themselves good reasons to remove either site from the GB.

74. The objectors' other arguments mainly concern the relationship of the sites with Shincliffe and the City. Shincliffe is rightly identified in Policy H3 as a 'smaller village'. It has only a limited range of services and I would expect most of its residents to travel to Durham City for most services or for employment. I would not regard development here as contributing to the sustainability of the Local Plan. Under Policy H1 I explain that there is no need to allocate more sites for residential development. In the longer term such development as cannot be accommodated on previously developed sites within the main built-up area is likely to take place on the edge of the larger villages beyond the GB. The development of land on the edge of smaller villages within the GB such as Shincliffe would not accord with this and would harm the effectiveness of the GB and, in the particular circumstances of the Durham GB, is not necessary in terms of the sequential approach. I do not doubt that there would be an active demand for new housing here but that would not make it more acceptable in terms of the strategy of the Local Plan.
75. I can see no reason to remove either site from the GB, whether for whole or partial allocation or for safeguarding for potential development in the longer term. Even if I were satisfied that development here might be acceptable in terms of the functions of the GB, there are other serious possible constraints to their development in terms of flood risk and the effects on the Conservation Area and on the Area of High Landscape Value. I note from the statements produced by the objectors that it may be possible to devise ways in which development might nonetheless be made acceptable in these terms, but in view of the wholly unacceptable nature of these sites in terms of GB and the general strategy of the Plan there is no need to examine them further at this stage. If this view were not to be accepted, it would be essential to do this but I have considerable concerns as to the likely harmful visual effects of development on either site on this particularly attractive and vulnerable area.
76. A P & R site in the vicinity of Shincliffe does not form part of the Local Plan strategy in Policy T7 but might perhaps come forward in the longer term. The advice in PPG13 makes it clear however that there is no need to remove land which would otherwise be included in it from the GB in order to allow for this possibility as in certain circumstances its development would be acceptable in the GB. At the same time, there is not such a demonstrable need for a site here as to justify the allocation of either or both sites in order to act as a form of enabling development.

Sniperley Park

77. I deal with the proposed P & R site under Policy T7A where I recommend that it is well located for that purpose and that localised harmful effects could be satisfactorily mitigated. In general the A167 forms a firm and appropriate boundary to the GB. The limited housing to the west at Witton Grove is rightly excluded from the GB but because of its limited size its harmful effects on the GB are not great. Any consolidation of this development, however, by the extension of the residential area to the north would be likely to cause disproportionate harm to the effectiveness of this part of the GB. I therefore recommend that the P & R site should remain in the GB and that the boundaries of the latter in this area should not be altered.

University of Durham

78. SP Policy 26 explains the special role of the University as a major employer and as an academic, economic, cultural, social, sports, recreation and tourism asset. Although it is now split between sites in Durham and Stockton, the main centre of its activities is likely to remain in Durham. The University owns large areas of land mainly to the south of the City, including Colleges, teaching and recreational facilities. The GB boundary is drawn tightly around the main existing developed parts of the University's land, thus including in the GB not only the sports grounds close to the river, but also open land at Whinney Hill and Mount

Joy whilst excluding from it the University Science Park.

79. I have viewed this area in detail, noting views both of and from it. I am in no doubt that, with the exception of parts of Howlands Farm which I deal with under Policy E2, the areas which the University wants excluded from the GB are all fundamentally open land, and also that they are all important in relation to the main purposes of the GB. Indeed I believe parts of it – around Whinney Hill, Maiden Castle and the sports grounds in particular – to be among those sections of the GB whose openness is of the highest importance. There is ample reason to include it all within the GB.
80. Against this must be set the importance of the future growth and development of the University to the well-being of the City as a whole. There appears however to be no adopted spatial or other strategy for its long or even medium term development. This seems to be dependent upon seizing funding, partnership and research opportunities as they arise. Whilst the acceptance of such constraints may well be a realistic approach for a body which must react to the changing availability and fashionable whim of private and public funding, I do not regard it as a sound basis on which to exclude from the GB areas of such particular importance to it.
81. I am aware that the potential future development needs of the University may include student accommodation and facilities, college development, and sporting and conference facilities. I appreciate that the inclusion in the GB of land, parts of which might have some potential to provide for some of these, may well cause difficulties for the University. Nonetheless bearing in mind the location and nature of the areas in dispute, it is hard to view a purely fortuitous and unplanned series of future University developments to the south of the City as being other than 'the unrestricted sprawl of [a] large built-up area', the checking of which PPG2 indicates as being the first purpose of including land in a GB. Whilst there might be a good case to exclude some areas for potential development if that were in accord with some form of development plan which took proper account of the many environmental constraints involved, in the absence of such a development plan I can see no such case.

Ushaw Moor – land south of Broom Lane

82. Under Policy H1(d) I deal with the proposed housing allocation at Ushaw Moor. The present objection site comprises land directly east of that allocation. Ushaw Moor is a village that is much longer from north-west to south-east than it is wide. An increase in its width, especially at the end that is closest to Durham City, would greatly increase the prominence of the settlement in relation to Durham City, and greatly reduce the effectiveness of this part of the GB in preserving its setting. The area of land involved is substantial but I can see no justification to remove even part from the GB.

West Rainton – land north of Finchale View

83. I deal with this site under Policy H1.

West Rainton – land north of Marks Lane

84. SP Policy 5 refers to the GB extending from the south 'north-eastwards to Sherburn and West Rainton, to encircle Durham City'. The PM shows Sherburn and West Rainton as forming the outer edge of the GB. Land north of West Rainton and east of the Leamside line is excluded from the GB whereas that west of the line is included.
85. The Inspector for the Chester-le-Street Local Plan inquiry recommended that the land north of the District boundary between the Leamside line and the A1(M) should be excluded from the GB. In reaching this conclusion she was aware of the view of Durham City Council but did not consider that the inclusion of this land would be necessary for the strategic purposes of the GB. I understand that it is likely that this recommendation will be followed when the Plan is adopted.
86. This would mean that unless the PM is modified much of the outer GB boundary in this

vicinity would consist of a fence and hedgerow or remnants of hedgerows. Taken together with the resulting very irregular shape of this part of the GB I do not regard this as being satisfactory to form a permanent edge to the GB. The boundary suggested by the objectors – Clay Services Ltd – would run along roads (Marks Lane and Pit House Lane) and then west to the Leamside line on the track to Priors Close. I can see considerable merit in this. It would have well defined and enduring physical boundaries and the relatively small area of land excluded from the GB would otherwise perform only very limited GB functions.

87. I am aware that the objector's purpose in seeking this modification concerns the use of part of this area for minerals and waste purposes, but my concern has been to seek boundaries that are satisfactory in themselves and that would correspond as far as possible with GB functions. The future use or development of land inside or outside the GB would then fall to be considered against the relevant policies of this Plan.

West Rainton – land south of Station Street

88. The general extent of the GB is clearly set out in SP Policy 5. As I explain earlier, its comparative narrowness means that the removal of substantial areas of land such as this to be safeguarded for potential longer term development would be likely to cause severe harm to the purposes of the GB. The land falls within the general extent of the GB, performs important GB functions, and I am aware of no site specific factors which might justify the exclusion of the site.

Witton Gilbert – land between the Bypass (A691) and Front Street

89. The construction of the Bypass has left a series of pieces of open land between it and the properties on the south side of Front Street. Like the Council, I consider this area to be of importance as part of the setting of the village. I do not, however, consider it to perform any GB functions and can see no reason therefore for the GB boundary to be modified to include this land.

90. I deal with the settlement boundary under Policy E7.

Witton Gilbert – land to the south and east of Brookside

91. These two sites are both arable land on the edge of the village and currently in agricultural use. Although they are higher than the World Heritage Sites, the nature of the intervening topography and landscape means that development on them would be likely to have at worst minimal impact on the setting or character of Durham City. They are, nonetheless, an integral part of the countryside around the village. The hedges and other boundaries are not features which tend to link them more to the latter than to the countryside, and the topography means that development here would be both locally prominent and would not appear logically related to the existing settlement. Overall it would simply give the impression of an outward sprawl of the village, and whilst the hedges and other boundaries might be said to restrain further development they would not make it appear more logical. I regard both sites as fulfilling important GB functions and recommend that they should remain in the GB.

Witton Gilbert – land at Witton Hall Farm

92. Although the settlement boundary for Witton Gilbert does not extend south of the by-pass, there is some existing development there, on the road leading to Witton Hall and to the church. It is however separated from the main village by both the by-pass and a short open area, and has more the character of a group of buildings within an area that is fundamentally open than of part of the settlement. An intensification of the amount of built development in this area would be likely to cause material harm to the openness of an area which I consider to lie clearly within the general extent of the GB. I therefore recommend that no modification should be made to the GB boundary in this area. New or altered buildings needed for agricultural purposes would of course not be inappropriate in principle in the GB, so that there would be no reason to change GB boundaries to allow for this.

Recommendation

93. I recommend that the Local Plan be modified as follows:

- a) as set out in PICs 45, 88 and 107.
- b) by the deletion from the Green Belt of land at Dunholme Close shown on Map 5 of the Local Plan.
- c) by the deletion from the Green Belt of land west of Low Newton comprising a field, a group of former agricultural buildings, and a small yard and its inclusion in the settlement boundary.
- d) by the deletion from the Green Belt of land north of Marks Lane, west of Pit House Lane and north of the track to Priors Close, West Rainton.
- e) by the deletion from the Green Belt of land at Onslow Terrace, Langley Moor as shown in FE19 and its inclusion in the settlement boundary.

Policy E2**Major developed sites in the Green Belt***Background*

94. PIC 37 would insert a sentence in para 3.24 explaining that sites subject to this Policy would remain part of the GB. PIC 57 as revised would add Barkers Haugh STW and Stonebridge Dairy to the list of sites.

*Inspector's reasoning**General*

95. The wording of PIC 37 is essential to make the status of the sites clear. The Policy incorporates the approach recommended in Annex C to PPG2. There would be no local reason or advantage in changing the title to 'major institutional sites' rather than 'major developed sites', the latter being the wording used in PPG2.

96. PIC 38 would insert a new Policy E2A dealing with the redevelopment of major developed sites. It would replace para 3.26 and remedy an important omission in the Plan.

Durham High School for Girls

97. I conclude elsewhere that the area around Howlands Farm should remain within the GB. For similar reasons I consider that despite its size and the amount of existing development the High School should also remain within the GB, although as a substantial site with major development the developed part should clearly be identified under Policy E2. The boundary shown in Inset G is drawn tightly around the existing developed area. This would leave some scope for possible infilling, but not for any new development, including the Science Block, which may be proposed outside it. However as that would be much more likely than infilling to involve a reduction in the openness of this part of the GB I can see no justification in this instance in loosening the boundary. Other than in very exceptional circumstances which could not now be foreseen, new development should remain within the Policy boundary.

Houghall College

98. Map 30 of the Local Plan would modify the PM by including two areas on the southern side of the site within the boundary. Although there is always a particular difficulty in delineating a boundary within a site such as this which contains a number of buildings and structures of differing size, appearance and use together with various open areas, I regard the boundary as modified as being practical and realistic in terms of the operation of this Policy.

Howlands Farm

99. The boundary of the site at Howlands Farm (F) is said to relate to the planning permission

which is being implemented. It includes areas where building will take or has taken place but excludes the car park and some but not all of the open areas around the buildings. It makes no allowance for further expansion. Although I find it hard to understand the reasoning that led to this boundary rather than one drawn either closer to the buildings or taking in their whole curtilage, the wording of the Policy would prevent development occurring under it which would have any greater impact on the openness of the GB than existing or permitted development. I am satisfied both that the site as a whole continues to lie within an area which should be included in the GB, and that the developed part could not sensibly be wholly excluded from the GB but should be regarded as a major developed site.

Finchale Abbey Training Centre

100. The Training Centre is listed as a 'major developed site' under this Policy. Harbour House Farms want the triangle of land between it, the road and the railway included in that site if neither are to be wholly excluded from the GB. I can see no case for excluding either site. They lie directly north of the main built-up area of Durham in the narrow gap between it and Chester-le-Street. I attach particular importance to maintaining its openness so as to avoid coalescence or even a reduction in the present separation of the settlements.
101. The Training Centre, originally a motel, is a charity teaching new skills, including horticulture, to disabled people. It comprises a series of mainly substantial buildings. The boundary defining the area subject to Policy E2 is drawn tightly around the main buildings. No objection has been made to this by the charity involved, and I am aware of no intentions to expand or alter any of their facilities. Under these circumstances I can see no reason to extend the boundary of the area subject to Policy E2. Even if expansion were to be contemplated, some – but not all – of the open areas to the east and south of the site would be more likely to be capable of minimising any harmful effects on the openness of the GB.
102. The land suggested by the objectors is separated from the Training Centre by a belt of trees and is prominent from the road and also from the railway. There is no good reason to add it to the Training Centre for the purposes of this Policy.

Sewage Treatment Works

103. Under Policy U8 I recommend that STWs at Barkers Haugh, Belmont and Browney should be identified under the present Policy. Under that Policy also I explain that the amount of development at Auton Stile reservoir is insufficient for it to be treated in the same way. Sherburn House is already identified under Policy E2 on the PM. Northumbrian Water want the area concerned to be extended to include also Sherburn House STW. This is however too small to warrant such treatment.

Recommendation

104. I recommend that the Local Plan be modified
- a) as set out in PICs 37, 38 and 57; and
 - b) by the identification under Policy E2 of Belmont and Browney STWs.