

Question 1

Spatial Vision

(The text of this response is identical to that given to Question 4.)

(a) Excessive focus on Durham City

1. The Trust accepts the need for regeneration and agrees that the City will have an important role to play in the Plan period, but is seriously concerned over the high degree of total development which DCC wishes to direct towards the City. The small, tight-knit nature of the City, which is one of its defining qualities, will be lost through a deliberate policy of subjecting it to excessive and unsustainable growth. The language of para 3.2 leaves one in no doubt of this key part of the Vision. The City is termed “an under-utilised asset” needing “a critical mass of employment, population and visitors” in order “to fulfil its potential” and to become “a city of regional, national and international significance.”
2. Such over-concentration and resultant increase in the size of the City would be highly injurious to its character. This is not simply the view of the Trust - the government-appointed Inspector at the 2002 Local Plan Inquiry concluded:

“ In essence the character of Durham does not derive from views of the Cathedral and Castle but from the relationship between them and the actual physical size 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” (para 4).

The *Regional Spatial Strategy* acknowledged this size constraint (2.77). Thomas Sharp, former president of both the Town Planning Institute and Institute of Landscape Architects, wrote: “There is no need for Durham to grow large. There would be no benefit in it, indeed, there would be injury.” Bill Bryson, past Chancellor of Durham University and international commentator, is only the last of a long line of writers who have valued the small size of the settlement : “It’s wonderful - a perfect little city”¹.

3. In stark contrast to these considered views is the comment of the County Planning Officer: “The population is too low to attract many of the facilities we want. Population is really holding Durham back in many respects” (*Durham Times*, 6th August 2010). The *Preferred Options* document expresses it thus: “The City needs a critical mass of employment population and visitors to become a city of regional, national and international significance” (4.87). But in specific spheres – architectural/spiritual, academic - the City is already of the significance mentioned, while the Trust does not agree that the City “currently lacks a coordinated critical mass of quality business and conference facilities” (6.63) given the facilities in its major hotels (including the convertible Gala theatre) and wide-ranging facilities in the colleges and lecture theatres of the University.

1 *Notes from a Small Island (1996), p.294.*

4. However, in terms of the significance of overall employment, it is unrealistic to envisage Durham as more than a sub-regional centre, given its size and geographical location within the North East. Despite the appellation ‘city’, Durham cannot hope to compete with Newcastle in terms of critical mass, for the former will remain the retail, professional services and media core of the region. Even in tertiary education, it should be noted that Newcastle has two universities and a bigger student population. In short, there are no indicators to suggest that Durham will ‘buck the trend’ characteristic of UK regions towards dominance of a main city, a trend apparent during an era of loss of traditional industrial bases and the growth of a service-led economy.

(b) Circularity and Over-aspirational Nature

1. *Preferred Options* contains an implicitly circular set of assumptions and/or aspirations. On the one hand, the proposed figures for new housing reflect an aspirational number of new jobs, even as, on the other, it is hoped that the new population will form a “critical mass” for creating those same jobs.
2. Again, the reference to the need for a “critical mass of employment, population and visitors” is merely a circular statement unless “critical” is defined. Otherwise it simply means “sufficient to achieve the stated aims.”
3. Comparison with other centres is also overly aspirational. At meetings between Trustees and County planners, for instance, Oxford and Cambridge have been held as models which Durham might follow. Unfortunately, the former evolved on opportunities that emerged locally. Attracting such opportunities from outside, as is proposed for Durham, is a very different prospect. (A reply to the Trust on this matter, that such inward investment was what had to happen, highlights the over-aspirational nature of the Plan, especially given the infrastructure that exists for county-based development at other sites.)
4. The 12,600 immigrants of working age, which *Preferred Options* hopes to see by 2030 may also seem unrealistic given the regional effects of central government policy in the large conurbations adjoining the County. See below at c(4) for more detail on this point.
5. A charge of dubious evidence may also be made. For example, the reference to “one million people of working age living within 45 minutes of the city” (*Preferred Options*, paragraph 4.84), to suggest that there is some economic advantage over cities such as Newcastle and Sunderland, is a bizarre use of statistics. In the GHK Report *Mapping County Durham’s Functional Economic Market Areas*², it writes that “there is anecdotal evidence that further growth could be unlocked should the constraints on sites and premises be overcome (para 3.3.3). Hardly less convincing is the assertion in the same Report that the City has “substantial congestion on existing road networks” (3.2), a

2 GHK in association with CURDS, Newcastle University, January 2010

statement which does not match the official Department of Transport statistics of congestion in Durham.

(c) Lack of proper recognition of regional context

1. The *Preferred Options* is essentially a plan for economic regeneration : “the over-arching priority for County Durham is to improve its economic performance” (4.1). It is therefore crucial that measures to promote improved economic performance are at the right spatial level, ie in the context of a meaningful economic area. Since the local government reorganisation of 1974 the administrative county no longer constitutes a meaningful economic area, and it is this challenge which *Preferred Options* fails to address. (This general challenge or dilemma is discussed in *Why Places Matter, and Implications for the Role of Central, Regional Local Government*³). County Durham is an integral part of the wider regional economy – in terms of economic links, economic institutions and national policies – and must be seen in this broader context.
2. The economic links between parts of County Durham and the neighbouring Authorities have been identified in *Mapping Co Durham’s Functional Economic Market Areas* (Reference given above.) Its detailed analysis of ‘functional economic areas’ shows that the northern fringe of the county groups with the adjacent parts of Gateshead, and thereby also with Newcastle and environs. In the eastern part of the county the link is with Wearside rather than Tyneside. In the south there are very strong travel to work and housing market linkages with the Tees Valley. Retail linkages show the same orientation.
3. Key among the institutional links are the North East and Tees Valley Local Enterprise Partnerships. “As the LEPs are based on more meaningful economic areas, they are better placed to determine the needs of the local economy along with a greater ability to identify barriers to local economic growth”⁴. In addition to Local Enterprise Partnerships, private sector businesses have recognised the need to coordinate activities on a regional level, and they have established the NE Economic Partnership to work on issues of strategic importance. There are also regional groups for specific industries, eg Tourism Network NE.
4. National policy issues, as applied to the region, do not affect the County uniformly. The two LEPs, for example, have been successful in their applications to set up Enterprise Zones in Sunderland and along the banks of the Tyne, and in the Tees Valley with sites in Hartlepool, Stockton, Middlesbrough and Redcar. Another central government intervention at regional level is the recent decision to provide funds for, and devolve decision-making to, Newcastle to help that city invest in growth, improve local skills, create jobs, support local businesses and improve critical Infrastructure.

3 Dept for Communities and Local Government, 2008

4 <http://www.communities.gov.uk/regeneration/economicgrowth/localenterprisepartnerships>

5. All of the above factors have implications which affect different parts of the county in varying degrees. It thus makes little sense to view Co Durham as if it were uniform space or an independent unit. It is a major flaw of the *Preferred Options* that it does not make serious and detailed attempt to embed the Plan in this wider context. There are but passing acknowledgements of the regional context. There is no mention at all in the document of Local Enterprise Partnerships, and while there is recognition of the 'duty to co-operate' (1.6), there is no indication of 'co-operation' thus far or how in practice the Council will ensure compatibility of the Local Plans of neighbouring authorities.

(d) Risky Strategy of the Plan

1. The Report of the Management Team to the Cabinet⁵ on 24th July 2012 identified three specific risks which it listed in Appendix A. These were public dissatisfaction at the focus on Durham City, which might lead to reputational damage; opposition to the Green Belt proposals, which if successful could lead to the Plan needing to be re-written; and failure of the recommendations to be approved, which would cause a delay in social, economic and environmental regeneration.
2. The risks identified by the Council's officers concentrate primarily on process risk and on risk to the Council's own reputation. This is rather a limited concept of risk, especially in view of the fact that the Council's prime purpose is to serve the well-being of the people of the County, rather than the reputation of its members and officers. The Council appears not to have acknowledged two areas of consequential risk for the intended beneficiaries of the Plan:
 - i. a failure within the Council's overall vision or of individual policies within it, whether resulting from changes in external circumstances, flawed evidence, or faulty interpretation, which prevented the Plan's delivering its intended outcomes
 - ii. successful challenge at public inquiry to any of the key elements of the plan which had the same effect.
3. As stated in our submission on Strategy, the Plan is over-aspirational. We live in uncertain times, and the Plan needs to reflect this. Scenario 4 is, as paragraph 4.27 recognises, ambitious and while no doubt the County Council and its partners will be working to achieve it, what is needed is a strategy that accepts that the outcome will quite probably fall short, and which ensures that the different elements are kept in step with each other.
4. The risk assessment did not consider that the business park at Aykley Heads might not attract the new businesses that are planned. On the other hand, the *Aykley Heads Draft Supplementary Document* states (para 2.6) that it is intended to demolish County Hall and relocate services elsewhere. In a worst-case scenario the numbers of people working at Aykley Heads could actually decrease.
5. The plans for new housing on three sites in the current Green Belt rely on a level of

5 <http://democracy.durham.gov.uk/documents/s24237/TheCountyDurhamPlanReportUSE.pdf>

Community Infrastructure Levy that is currently the highest proposed outside London. (See the Trust's submission on the CIL for more detail.) This could be reduced by the Inspector. If this happened there would be insufficient funds to pay for the Western and Northern Relief Roads.

6. The same effect could result from central government action if CIL levels were lowered or indeed abolished altogether. Before the last election the Conservative Party said that if elected it would abolish CIL. The Coalition Government has not done this, but if the Conservatives win the next election outright they might carry out the threat. There is a growing body of debate and lobbying about the level of CIL and the effect it could have on affordable housing provision. This is a very fluid area, and it would be unwise to assume that a high level of CIL could be maintained throughout the life of the Plan.
7. An increase of 3,875 houses in the proposed Durham City Strategic Housing Sites will increase demands for medical services and school places. While Policy 7 proposes a primary school and health centre for Sniperley Park, there is the risk of over-demand for places at the local secondary schools.
8. The proposal for a new supermarket and petrol station on 3.5ha immediately north of Arnison, when added to the existing facilities at Arnison and Mercia centres, will create an alternative with easy parking that will be at the expense of Durham City centre. (In addition, as our answer to Question 27 shows, it is inconsistent with the evidence and advice provided by the Authority's own consultants and with the latter's analysis of the retail issues facing Durham City and its catchment. It is also contrary to guidance in NPPF and with the interpretation of national and regional policy provided by its own officers.)
9. A final risk of the spatial policy of the Plan would arise if house building proceeds apace on Green Belt sites, which are obviously favoured by developers, but commensurate employment opportunities do not materialise. The extensive new areas could become dormitories for Newcastle. Then if new employers open in County Durham subsequently, the homes intended for their workers will no longer be available.