

## Question 15

### Policy 13 – Green Belt

1. The Trust objects to Policy 13 since it relates to the area within the redrawn boundaries of the Green Belt on the Local Plan's new Proposal's Map. (The content of the policy would have been acceptable in relation to the existing Green Belt.)
2. The Authority's attack on the Green Belt stems from its over-concentration on Durham City and a consequent search for housing sites within 5km radius. Its methodology in choosing housing sites is misguided, for there should have been an initial investigation of all potential sites over a more generous area in which Green Belt locations were assigned extremely negative weightings, since one of the two essential characteristics of a Green Belt is permanence. The methodology is further misguided in using environmental impact or landscape value to select which parts of potential Green Belt locations should be selected for housing, since openness and not landscape quality is the other essential characteristic of Green Belt. (NPPF, para 79).
3. The City's Green Belt was only conceded by the previous County Council at the third time of asking; its first proposal did not constitute a 'belt' at all (County Structure Plan Review: Deposit Plan, 1995, p.82). The present Green Belt is acknowledged in the present *Preferred Options* to be "drawn extremely tightly around the City" (4.183). In fact, it is so tightly drawn that it is the smallest Green Belt of any historic city. This was noted by the government-appointed Inspector at the 2002 Local Plan Inquiry: "[M]ost GBs are many miles wide.....The general extent of the GB around Durham...as defined on the Proposals Map is seldom more than 5km wide and in parts is as little as about 0.8km." (para 7). Notwithstanding its acknowledged minimal extent, and NPPF stating that, "Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt," (para 81), the Council now wishes to remove three sizeable chunks.
4. Such action appears contrary to NPPF: "Once established, Green Belt boundaries should only be altered in exceptional circumstances" (para 83). The Authority itself expressed doubt in a Council Policy Statement reviewing the major implication of the NPPF two months after its appearance: "The Government has also reasserted the need for Green Belt protection and the requirement to demonstrate exceptional circumstances for any Green Belt deletion remains. As such, it is highly unlikely that proposals that involve the development of Green Belt land will be viewed favourably in the light of this Paper" ('Assessing Development Proposals in a changing National Planning System', May 2012, p.136, para 3.18)
5. The present *Preferred Options* document does not spell out what the Council considers to be the "exceptional circumstances" – indeed, the phrase is not used in the document, but in response to a formal question to the Authority by the Trust, the Council's Portfolio Holder for Economic Regeneration (25 July 2012) gave this answer:

*As Mr Clark correctly identifies the NPPF states that Green Belt boundaries should only be altered in exceptional circumstances and through the preparation of a Local Plan.*

*The County Durham Plan is therefore the correct mechanism for a review of the Green Belt and the exceptional circumstances which justify this review are the same as those that underpin the entire Plan and its Strategy:*

- The poor state of County Durham's economy and the resulting high levels of unemployment and deprivation;*
- The lack of government investment available to assist our deprived communities and significant reduction in public sector expenditure to support economic development and training;*
- Low land values in many parts of the County with the resultant lack of interest from developers;*
- The need to be build [sic] on the County's assets such as Durham City to ensure the delivery of new development; and*
- Significant underperformance against national averages on all indicators of prosperity and economic wellbeing.*

*It is clear that what has been tried in the past, which although there has been some successes, has not been sufficient to lift County Durham from its position as the poorest performing economy in the Region , which is in turn the poorest performing in the country. The Council must have an ambitious Plan if it is to change this and the current economic difficulties mean that we need to redouble our efforts to achieve this. It is the Council's view therefore, that these circumstances are indeed exceptional.*

The Council's *Durham City Green Belt Site Assessment Phase 3* (September 2012) para 1.5 later repeated the identical reasons. The Trust does not doubt the serious economic situation in the country and county, but finds it profoundly unsatisfactory to argue in such general terms to adjudicate between specific locations. The case is not thereby made for altering specific boundaries within the Green Belt.

6. It should be noted that the Inspector in 2002, in anticipating possible future development, came to a different conclusion. Acknowledging the small size of the GB, and recognising the need for sustainability, he concluded that development outside such a comparatively narrow Green Belt could "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." (para 7). The outer edge of the Durham Green Belt in fact can be reached in any direction in 10-15 minutes by public transport. The Trust therefore maintains that the Council is (a) flying in the face of time-distance reality, as well as the Inspector's conclusion, (b) turning a blind eye to the NPPF. (The latter also states that authorities "should consider the

consequences for sustainable development ....towards locations beyond the outer Green Belt boundary” (para 84).)

7. As a result of the above facts, the Trust objects to the three proposed Strategic Green Belt Alterations in order to develop housing on such land at Sniperley Park, north of the Arnison Centre and Sherburn Road. Our detailed reasons are given in our answer to Question 9 on Policy 7. The Trust also objects to the removal of Green Belt status at the Aykley Heads Strategic Employment Allocation. Detailed reasons are given in our answer to Question 8 on Policy 6.
8. Among the proposed Non-Strategic Green Belt Alterations, the Trust also objects to the proposals for Land to the South of Sniperley Park & Ride, at Fernhill and at the former Stonebridge Dairy site.
  - (a) Sniperley P&R: The Trust agrees with the 2002 Inspector, who stated, “Any consolidation of this development [Witton Grove], 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” (para 77).
  - (b) Fernhill: Again, the 2002 Inspector was unequivocal: “ I consider the GB value of this site to be very high. It lies on the western side of the A167and although there is certainly already development on substantial lengths 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 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 two 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” (para 38).

Planning applications for residential development on the site have twice been refused in recent times, the last in September 2011

(c) Former Stonebridge Dairy: the Local Plan defined this as a Major Developed Site in the Green Belt, which is at its narrowest here between the Stonebridge public house and Langley Moor. The planning permission that was granted in 2008 was for a business park and it was justified on the grounds that it would “reduce the impact on the openness of the green belt compared to the current buildings”<sup>1</sup>. We also note that employment here would be readily accessible from Langley Moor, Brandon, Meadowfield and the villages in the Deerness Valley. This is a sensitive site

---

1 Committee report <http://217.23.233.227/WAM/doc/Committee%20Report-156664.pdf?extension=.pdf&id=156664&location=VOLUME1&contentType=application/pdf&pageCount=3>

and in an ideal world, given that the major developed site has been demolished, we would like to see this remain as Green Belt. But recognising the realities of recent planning history, if the site is to be a candidate for development, there must be conditions that minimise the impact that development would have on the surrounding Green Belt.