

## Question 6

### Policy 4 - Distribution of Development

1. The Trust feels that the distribution focusses too heavily on the City of Durham. There are two aspects to this: the first is that given how much of the area surrounding the City is within 15 minutes by bus or 10 minutes by car from the City Centre, it would be perfectly possible to site new housing outside the Green Belt while still achieving the objectives of the Plan. The fact that the city is surrounded on all sides by smaller settlements makes it possible for those working in the City to choose the best match between their residence and their employment without necessarily travelling across the city centre.
2. The 2012 *County Durham Settlement Study* repeats the shortcomings of the earlier version. A detailed critique accompanies this submission but the main points are that the scoring matrix used is rigged in favour of the main towns to the detriment of settlements which are quite close, but not close enough, to a main town. Consequently the Plan proposes that development should be concentrated in the large towns and not in the broader hinterland around them.
3. There is a discrepancy in that the footnote to paragraph 4.41 references the *County Durham Settlement Study* dated December 2010<sup>1</sup> but the Key Evidence Base gives a 2012 date. We have used the 2012 version which is also on the Council website<sup>2</sup>.
4. The County Durham Plan proposes 21,805 new houses in the 12 main towns and 5,470 in the smaller towns and larger villages. For the reasons given above, this needs to be rebalanced away from the main towns.
5. There are more sensible ways of achieving County-wide improvement in economic performance. First, a different balance between the role of Durham City and other parts of the County is feasible and desirable. Greater weight should be given to the opportunities for attracting further employment, and associated housing, to the Policy Delivery Areas other than the Central area, with further attention given to sites such as Amazon Park and Durham Gate. This would not only alleviate the detrimental effects of excessive development in Durham City but would also help to achieve the declared intention (Objective 6) of lessening inequalities between communities in the County.
6. Secondly, further development of the City would be eased by taking a broader geographical view of the 'City'. NPPF guidelines (para. 17) say that growth should be actively managed to make the fullest possible use of public transport, but even with existing public transport it is clear that within 15 minutes of the City centre there are possibilities for housing and other development in non-Green Belt sites. In addition, the concentration on Aykley Heads could be lessened by giving more attention to employment sites such as the Ice Rink and Milburngate House, instead of cursorily dismissing such sites (p. 61).

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1 <http://content.durham.gov.uk/PDFRepository/CountyDurhamSettlementStudyDec2010.pdf>

2 <http://content.durham.gov.uk/PDFRepository/CountyDurhamPlanSettlementStudySeptember2012.pdf>

7. The Key Evidence Base cites the County Durham Strategic Housing Land Availability Assessment (2011) but this is not available on the public websites. We used a Freedom of Information request to elicit the 2010/11 SHLAA Trajectories spreadsheet. This shows net annual totals which sum to 39,172 dwellings and does not include the three “strategic” sites proposed for the Green Belt around Durham. This is clearly substantially in excess of the requirement stated in the *Preferred Options* report, even before making any allowance for empty properties.