

Comment Receipt

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| Event Name | County Durham Plan Pre-Submission Draft |
| Comment by | The City of Durham Trust (Mr John Lowe - 440609) |
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Q1

Do you consider that this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant and Sound?

(Please note the considerations in relation to the Local Plan being 'Legally and Procedurally Compliant' (Please see guidance notes).

(Please select one answer for each question)

Legally and Procedurally Compliant Yes (Go to Q2)

Sound No (Go to Q3)

Q3

Why do you consider that this Policy/Proposal of the Pre-Submission Draft Local Plan is not Legally & Procedurally Compliant or sound? (Please select all that apply)

- . Positively Prepared
- . Justified
- . Effective
- . Consistent with national policy

Q4

If you do not consider this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant or Sound please use this box to explain why. Please note your representation should cover all the information, evidence and supporting information necessary to support/justify the representation as there is no opportunity to submit further representations unless requested to do so by the Inspector, based on the matters he/she identifies for examination.

The City of Durham Trust has examined Tables 5 and 6 and the accompanying paragraphs. It is striking that the proposed strategic allocation percentages are for eight sub-areas and one particular urban area - Durham City - which lies within the sub-area called Central Durham. No other sub-area separates out a particular main town. So it is not possible to understand how Paragraph 4.74 is delivered; the

chosen "Sustainable Communities" strategy is of development "principally focussed in and around the towns which offer the greatest opportunities for employment, services and facilities..." but no town-by-town percentages are provided. It would helpful to say the least to have the equivalent percentages for Consett, Stanley, Chester-le-Street, Bishop Auckland, Spennymoor, etc to compare with the 14% allocated to Durham City. In these terms the resulting Policy 4 is **not Positively Prepared, nor Justified, nor Effective.**

Although a town-by-town comparison is not provided, a comparison can be achieved in sub-area terms by including Durham City's 14% with Central Durham's 12%. Thus the Central Durham sub-area is allocated 26% of the total housing provision for County Durham. The next largest allocations are shown in Table 6 as Mid-Durham and South Durham at 16% each. Clearly Central Durham including its main town is receiving by far the largest of all sub-area allocations. The obscurity surrounding the allocations under the "Sustainable Communities" strategy as set out in Paragraphs 4.60 to 4.76 and Tables 5 and 6 means that the Plan in this regard is **not Positively Prepared nor Justified.**

Furthermore, a major question in Durham City is about that part of the resident population that are students. The County population figure includes term-time resident students. Durham City's population is said to be 44,886 in 2011 (paragraph 4.89). This figure includes 10,900 students, the vast majority of whom are Durham University students. The University's growth strategy aims for 21,500 students in Durham City by 2026/27 from a base of 15,475 in the city in 2016/17. There is no explanation as to whether this increase by 6,000 students is included or in addition to the County Durham population and households projections. Nor is it stated whether these student housing needs are included in the County Council's figure of 14% of 24,852 houses i.e. 3,480 houses at Durham City. It is not possible to ascertain whether the built and the approved PBSAs are included in the housing supply figures. The conversions of family homes into HMOs are deliberately not taken into account, nor the reverse process. Accordingly, the Trust considers that the Plan fails adequately to quantify and meet housing needs and so is **not positively prepared**; is not based on proportionate evidence and so is **not justified**; cannot be **effective**; and does not meet the terms of NPPF regarding the housing needs of students and therefore is **inconsistent with national policy.**

Q5

What change(s) do you consider necessary to make this policy/proposal of the Pre-Submission Draft Plan Legally & Procedurally Compliant and Sound?

Provide an amended Table 6 that displays the strategic distribution of housing in like-for-like terms i.e sub-areas, and an associated table showing the strategic allocations to the principal towns (including Durham City) which offer the greatest opportunities for employment, services and facilities.

Explain how student accommodation has been treated, specifically whether or not the built and the approved PBSAs are included in the housing supply figures. If not included, provide further information to show how the housing needs of students have been met.

Q6

Do you wish to participate in the Examination in Public? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the Examination). Yes

Q7

Do you want to be informed of the following:

The submission of the Local Plan to the Secretary of State? Yes

The publication the Inspector report? Yes

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| Consultation on any Main Modifications? | Yes |
| The adoption of the County Durham Plan? | Yes |