

Comment Receipt

Event Name	County Durham Plan Pre-Submission Draft
Comment by	The City of Durham Trust (Mr John Lowe - 440609)
Comment ID	638
Response Date	06/03/19 13:10
Consultation Point	Policy 15 (View)
Status	Submitted
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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 No (Go to Q3)

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 notes that about 87% of the extra households in County Durham between 2018 and 2035 are predicted to be aged 75 years and over. Policy 15 requires only 10% of the 5,390 proposed new dwellings in County Durham, i.e. about 540, should be provided for the elderly. The Trust urges that the percentage should much higher. The 10% figure is derived from what is acceptable

to developers; the County Council should be setting a much higher requirement based on quantified need.

The accompanying consultation on a 'County Durham Housing Strategy' states that "Over the period 2016 – 2035, a minimum of 90% of household growth over the Plan period will be in households aged over 65." It goes on to say "The Council will ensure that housing is provided specifically to meet the needs of the older people within our communities." Unfortunately, the Draft Housing Strategy does not say how the Council will ensure that anything like adequate quantities of housing for the elderly will be provided. All it says is that "the Pre-Submission County Plan will deliver over 600 homes for older people", and that "a notable proportion of older people were considering buying a property on the open market or renting from a housing association to meet their housing needs." The Council has to do much more if the right kinds of houses are to be built. This does not imply a justification for approving thousands of so-called 'executive housing' in the belief that this provides the best profit margins and thereby some elderly persons' housing.

The Policy is clearly **not positively prepared** because it fails to provide for the housing needs of elderly people; for the same reason is **not justified**; cannot be **effective** in responding to the prediction that 87% of the extra households in County Durham between 2018 and 2035 will be aged 75 years and over; and is inconsistent with **National policy** as expressed in NPPF 2019 paragraph 61 which says: "the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)".

Q5

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

Policy 15 should require that 50% of all new housing must either be designed specifically for older people, or designed to a lifetime standard so that their residents can continue to live in them throughout their lifetime.

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

Consultation on any Main Modifications? Yes

The adoption of the County Durham Plan? Yes