

Comment Receipt

Event Name	County Durham Plan Pre-Submission Draft
Comment by	The City of Durham Trust (Mr John Lowe - 440609)
Comment ID	727
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Consultation Point	Policy 4 (View)
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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)

Do you have any comments to make on the housing allocations? If so, please select the relevant site from the drop down menu.

None Selected

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 is concerned that there is no clear connection between the chosen strategy of allocating 14% of the total new housing to Durham City and the amount of housing land proposed. Paragraph 4.92 says that *“without the release of Green Belt land, Durham City would only be able to contribute about 6% of the total housing need of 24,852 houses. This is not sufficient for what is the County’s largest and most sustainable settlement.”* Thus we have a circular argument - sufficiency is merely meeting an arbitrary 14% share of the County total Local Housing Need. It is impossible to escape from the impression that the large-scale “Sustainable Urban Extensions” amounting to 2,120 houses in the Green Belt are a pre-determined project, a survivor from the ‘critical mass’ fixation of the Withdrawn Plan. The policy is therefore **not justified..**

The proposed "Sustainable Urban Extensions" at Durham City result in a total proposed allocation of 2,260 new houses there. The total allocation for new houses in County Durham is 5,390 (as against the residual allocation of 5,323 required to meet the LHN). Thus over 42% of the additional County housing development allocation (beyond the sites already committed) is at Durham City. This is a severely unbalanced strategy and misleads the County Council into proposing major deletions of the Green Belt and unnecessary Relief Roads, so **not positively prepared, nor justified, nor effective, nor consistent with National policy.**

As already stated in relation to Paragraphs 4.60 to 4.76 and Tables 5 and 6, the quantum of housing allocated to Durham City may or may not include housing for University students in Durham City. To repeat: 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 Policy 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?

Remove from Table 7 in Policy 4 the proposed “Sustainable Urban Extensions” allocations at Sniperley Park and Sherburn Road.

Explain whether student housing is included or excluded from the housing distribution figures.

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