

Comment Receipt

Event Name	County Durham Plan Pre-Submission Draft
Comment by	The City of Durham Trust (Mr John Lowe - 440609)
Comment ID	483
Response Date	05/03/19 10:19
Consultation Point	Policy 1 Quantity of New Development (View)
Status	Submitted
Submission Type	Web
Version	0.1

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)

- . Justified
- . 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 considers that this policy is **neither legally compliant nor consistent with National Policy NPPF** because no justification or evidence as to it being strategic as opposed to local is provided.

The City of Durham Trust recognises the difficulties faced by Durham County Council in dealing with major shifts in Government requirements on the quantity of new housing development for which provision must be made. The most up-to-date (i.e. 2016-based) official prediction for County Durham

is of 248,000 households in 2035. However, the Government has decided that, in order to match its national target, the previous (2014-based) projections are to be used as a temporary solution while fresh up-to-date projections are developed. Thus the temporary figure for County Durham is 252,000 households in 2035. In due course a new official projection will emerge. The Trust acknowledges that the housing provision figure for County Durham now being used (24,852) is more realistic than in the Withdrawn Plan (31,400), but registers its view that a sound and robust County Durham Local Plan requires truly objective population and household projections, and anticipates that the quantity of new housing required in County Durham will be much closer to the 2016-based figure than the 2014-based figure. The strategy arising from an expected over-estimate of LHN results in an excessive 'requirement' in Durham City and leads the County Council to propose unjustified justify major incursions into the Green Belt. The Policy is therefore **not justified**.

The quantity of new housing development to provide in Durham City is dealt with under Policy 4.

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 1 should be amended to specify a reasoned lower quantity of new homes.

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