

THE CITY OF DURHAM TRUST

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Dear Planning Policy Consultation Team

Consultation on proposed approach to updating the National Planning Policy Framework

The City of Durham Trust is very pleased to have the opportunity to comment upon the proposed approach to updating the National Planning Policy Framework. We appreciate that this consultation is about a limited number of immediate changes to the policy context and wording.

The Trust is a long-established organisation dedicated to maintaining the City of Durham as an internationally acknowledged historic Cathedral City rich with historical assets and contained in a green setting. Our purpose is to celebrate, protect and enhance the heritage and landscape of the City. We celebrate positive action and are forthright in resisting damaging change and holding decision-makers to account. We also champion and celebrate innovative developments and initiatives that keep the City of Durham distinctive, attractive and liveable.

We offer our responses to the consultation questions in the attached note. Our comments on the proposed text changes are below; our overall view on the proposed approach and text changes to the NPPF is that they are welcome.

Paragraph 7

As proposed, the first sentence says *“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure in a sustainable manner”*

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We think that the need for provision to be in a sustainable manner is intended to apply not just to infrastructure but to the provision of homes and other forms of development. Accordingly we suggest that this paragraph should have an extra comma after *infrastructure* so as to read: *The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes and other forms of development, including supporting infrastructure, in a sustainable manner.*

Paragraph 15

This proposed amendment appears to stiffen the requirement on housing need by changing “*addressing*” to “*meeting*”. However, subsequent paragraphs such as paragraph 35 delete the term “*as a minimum*” and instead introduce the phrase “*as far as possible*” which appears to soften the requirement again. We suggest that this apparent ambiguity should be resolved one way or the other. Our preference would be to go with “*addressing*” and “*as far as possible*” so as to accord with the other flexibilities being introduced.

Paragraph 35

As suggested above re paragraph 15.

We also see in Paragraph 35 that it is proposed to remove the second test of a Local Plan’s soundness, namely that it is sound if “*b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*”

The 2012 NPPF required (paragraph 182) the “most appropriate strategy” and since 2018 the wording has required “an appropriate strategy”. The complete removal of the need for justification seems to allow plans to set out an inappropriate strategy, or for them not to be backed up by proportionate evidence. The requirement for proportionate evidence is especially important as this entails the planning authority publishing its evidence base, which can then be scrutinised by the public. Our experience with the preparation of the County Durham Plan, withdrawn part way through Examination in 2015, and with the revised version adopted in 2020, was that the requirement to demonstrate that the Authority’s preferred strategy was appropriate and backed up by sufficient evidence significantly empowered objectors, who were able to demonstrate to the Inspector that alternatives existed which were both objectively and in public preference terms the better choice. The Inspector’s amendments helped to protect the Green Belt and promote sustainable transport. The Trust therefore considers that test (b) should be retained.

Paragraphs 60 et seq

We support the proposed flexibilities but observe that the Standard Method for assessing housing need is still the starting point. There have been suggestions in Ministerial Statements that the Standard Method is being reviewed; is that still the intention?

Paragraph 142

The proposed amendment is that “*Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing*

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over the plan period. “ The Trust is somewhat unsure of the meaning of this proposed text and would be glad of some clarification; if it means that an inability to meet the objectively assessed need for housing over the plan period is not in itself a sufficient trigger to require amending green belt boundaries to release land for housing development, we would be most supportive of this.

Paragraph 160 Footnote 63

The interplay between footnote 62 and footnote 63 is confusing, and greater clarity here would be beneficial.

Paragraph 161

We are very glad to see the proposed amendments to give significant weight to the need to support energy efficiency improvements. We would wish to go further as envisaged in Christopher Skidmore MP’s review, putting net zero at the heart of planning reforms nationally and locally.

Thank you again for the opportunity to comment, we hope that the attached schedule of answers to questions and the above points on text changes are helpful.

Yours sincerely

[John Lowe](#)

Chair of the City of Durham Trust