

DURHAM CITY NEIGHBOURHOOD PLANNING FORUM

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Dear Planning Policy Consultation Team

Consultation on proposed changes to national planning policy

I am responding to the above consultation in my capacity as chair of the Durham City Neighbourhood Planning Forum, which constitutes the approved body for preparing the neighbourhood plan for the historic area of Durham City. We include in our concerns the conservation and enhancement of the physical environment, the allocation of sites for residential development of various kinds and the restoration of balanced and sustainability communities.

PREAMBLE

We consider that much of the proposed changes to national policy should be welcomed. The emphases on developing brownfield land and small sites are especially relevant and important here in Durham City.

AFFORDABLE HOUSING (paragraphs 6 -12)

Whilst the proposed broadening of the definition of 'affordable housing' is superficially attractive, the effect of the proposed removal of the 'in perpetuity' requirement would almost certainly mean that starter homes first purchased at 80% of the market value will revert to full market prices when re-sold. The proposed removal of the requirement to re-cycle the 'affordable housing' subsidy adds to the probability that affordability will be short-lived. Furthermore, the emphasis on promoting starter homes would tend to 'squeeze out' social rent and shared ownership schemes. The proposed changes on affordable housing would seem to make it more difficult for local authorities and neighbourhood plans to foster more balanced and sustainable communities as envisaged in the Localism Act and the National Planning Policy Framework.

INCREASING RESIDENTIAL DENSITY AROUND COMMUTER HUBS (paragraphs 13 -18)

This proposal has intrinsic sustainability merits. We agree that minimum density standards should be set locally, not nationally, so as to be able to reflect local character and needs and avoid the risk of lower quality development.

SUPPORTING NEW SETTLEMENTS (paragraphs 19-20)

Whilst new settlements are not of direct concern to our particular neighbourhood plan, we note in paragraph 19 that mention is made of considering whether to establish Green Belt around or adjoining such settlements. We are delighted that the significance of the green belt policy is recognised; we are fortunate that Durham City has one of the 14 existing green belts in the country. Our green belt fulfils all five of the NPPF purposes of green belt and is of fundamental, indeed paramount, importance to Durham City and to County Durham.

HOUSING ON BROWNFIELD LAND (paragraphs 21 - 22)

We applaud the proposed substantial weight to be given to the benefits of using brownfield land for housing. However, not all brownfield land is necessarily in sustainable locations and therefore it essential that the proposed policy change is qualified to insist upon the well-established NPPF requirement that development must be in sustainable locations.

It is also the case that brownfield land often requires remedial treatment that makes it more expensive to develop than greenfield land. This factor has bedevilled the assessments of deliverability in Strategic Housing Land Assessments here and no doubt elsewhere and has thereby induced our Planning Authority - Durham County Council - to allocate and approve housing development sites on "easy" greenfield land, leaving derelict brownfield land as neglected eyesores. Regeneration of our town and villages requires not only a 'presumption in favour of development' on suitable brownfield land but also financial mechanisms to equalise the costs of developing such land.

SMALL SITES (paragraphs 23 - 26)

The proposals under this heading are especially welcome, for all the reasons given in the consultation paper. The safeguards in paragraph 24 are essential, namely that identified small sites and unidentified 'windfall' sites should be "*within existing settlement boundaries and well-designed to promote or reinforce local distinctiveness*". For the record, a reasonable estimation of the contribution of brownfield, small and windfall sites within Durham City was provided for the Examination in Public of the County Durham Local Plan, and this effectively doubled the Planning Authority's figure for the capacity of Durham City to provide new homes.

ENSURING THAT HOUSING IS DELIVERED ON LAND ALLOCATED IN PLANS (paragraphs 27 - 33)

This discussion is about under-delivery of planned rates of housing completions. Mechanisms for monitoring (paragraph 31) and for taking actions to address shortfalls (paragraphs 32 - 33) are unexceptionable. However, we regard it as essential that the proposed actions are undertaken within a coherent local policy review framework, not as opportunist or re-active grantings of permission on an ad-hoc basis. There is also a need to stop land banking (paragraph 28). Some form of financial penalty should be applied if a developer does not develop a site with planning

permission; if sterner disincentives to the hoarding of sites are required, the permission should be revoked and the developer should not be able to reapply for the same development site.

SUPPORTING DELIVERY OF STARTER HOMES (paragraphs 34 - 54)

Existing policy contains an exception site planning policy to allow applicants to bring forward proposals for starter homes on land not currently identified in the Local Plan for housing development. The proposed changes with regard to commercial and employment land (paragraphs 35 - 39) seem to be suitably qualified by way of requiring up-to-date assessments of need and market viability. Similar provision for retail, leisure and non-residential institutional land brownfield land (paragraph 40) seem sensible. The clarification proposed in paragraphs 41 - 42 should prove useful. Opportunities for mixed-use developments (paragraphs 43- 44) are very relevant and appropriate for our neighbourhood plan and we endorse the proposals. The proposed change in relation to rural areas so as to allow a local connection test (paragraphs 45 - 47) is admirable.

However, we are very concerned by the suggestion in paragraphs 48 - 49 that national policy should be amended so that neighbourhood plans can allocate appropriate small-scale sites in the Green Belt specifically for starter homes. Further, paragraphs 50 - 54 proposes to allow redevelopment of brownfield land in the Green Belt unless there is **substantial harm to the openness** (our emphasis) of the Green Belt. These are both significant relaxations of the current policy protection for Green Belt. In our opinion they are unjustified - they would make a trivial contribution to the quantum of housing development needed and yet they would degrade the very exceptional tests that protect the Green Belt, the most popular of all planning policies. We consider that neither of these proposed changes should be enacted.

In conclusion, we thank you for the opportunity to comment and trust that our observations are helpful.

Yours faithfully

[signature] Roger Cornwell