



## Durham City Neighbourhood Planning Forum response to the County Plan Issues and Options consultation

Durham City Neighbourhood Planning Forum is the approved body for preparing a neighbourhood plan for the un-parished historic central part of Durham city. We have held major public consultations on what is good about Durham city, what is bad and what needs to change. Drawing from the responses and from the guidance provided by officers of the County Council, we are currently drafting policies and proposals for a pre-submission draft neighbourhood plan. The following comments are based upon this work.

Question	Comments
<p><b>Question 2</b> Do you agree with the objectives? Can you suggest any alternatives and are there any missing?</p>	<p>Generally yes, we agree, especially with Objective 8 on protecting the quality of the built and historic environment, but see later answers (e.g. to Question 5) for some specific qualifications.</p>
<p><b>Question 3</b> Do you agree that County Durham is a single Housing Market Area for developing housing needs?</p>	<p>We doubt that County Durham can or should be treated as a single housing market area. Tyneside, Wearside and Teesside are definitely part of the sub-regional or regional housing market that includes County Durham. Within County Durham we see a variety of housing markets, ranging from the costly Durham city market through to the weaker markets where house costs are half or even less.</p>
<p><b>Question 4</b> Which population growth scenario do you prefer? a. 1,533 houses per year; b. 1,629 houses per year; c. 1,717 houses per year; d. None of the above, please suggest an alternative option.</p>	<p>All three scenarios for house-building rates are too high, because the population and household projections are too high. We suggest that lower rates of house-building will be appropriate once the latest projections have been analysed.</p>

<p><b>Question 5</b> Is the ambition to increase the employment rate to 73% as part of creating more and better jobs within County Durham realistic?</p>	<p>We agree that the aim should be that the employment rate returns to, and be maintained at, pre-recession levels. However it is difficult for us to judge whether the specific 73% target is appropriate. Reducing the unemployment and NEETS rates to the national level would be a good aim.</p>
<p><b>Question 6</b> Do you agree that it is appropriate to include a windfall allowance for small sites less than 0.4 hectares (12 houses)?</p>	<p>Yes.</p>
<p><b>Question 7</b> Do you agree that there should be no windfall allowance for large sites over 0.4 hectares (more than 12 houses)?</p>	<p>We consider that a windfall allowance for large sites should be made.</p>
<p><b>Question 8</b> Is it appropriate to include an allowance of 50 units per year for bringing back empty properties into use in the housing supply?</p>	<p>We have no evidence ourselves but agree that an appropriate allowance should be made.</p>
<p><b>Question 9</b> Is it appropriate to include an allowance of 50 per year for demolitions in the housing supply?</p>	<p>Again, we have no evidence ourselves but agree that an appropriate allowance should be made.</p>
<p><b>Question 10</b> Do you agree that these factors are the most important when considering the options for the Plan's spatial strategy or are there others?</p>	<p>Yes. We would emphasise that the need to protect the Green Belt and improve Green Infrastructure should be one of the considerations.</p>
<p><b>Question 11</b> Do you agree that it is appropriate to focus on the most attractive economic market areas? Are there any alternative approaches that could be used?</p>	<p>In order to get new jobs to where unemployed people (particularly women) are living there needs to be a degree of direction. We would stress the importance of impact assessment for any area of development - a positive development for one locality can have an outweighing negative effect on other localities.</p>

<p><b>Question 12</b> <b>Call for Sites</b> Should evidence show they are required, are you aware of any site that should be considered for allocation for food and non-food retail? Please refer to the Call for Sites document for detail on what information is required.</p>	<p>We believe that North Road and Lower Claypath should be primarily retail, not takeaways and charity shops.</p>
<p><b>Question 13</b> Considering the implications of each option, please specify which you prefer and please give reasons: a. Main Town Focus; b. Sustainable Communities; c. Sustainable Communities with Central Durham Villages; d. Wider Dispersal; or e. None of the above. Please suggest an entire alternative option, for example a new settlement, or a variation of one of the existing options.</p>	<p>Options (b), (c) and (d) seem to offer the best distributions in the interests of towns and villages across County Durham. We cannot support the over-development of Durham city envisaged in Option (a).</p>
<p><b>Question 15</b> <b>Call for Sites</b> Are you aware of any sites that should be considered for allocation for housing? Please refer to the Call for Sites document(xix) for detail on what information is required.</p>	<p>Yes, see table at end of this schedule of comments.</p>
<p><b>Question 16</b> Is it appropriate to identify some employment sites that are only suitable for a particular type of employment use, for example research and development, and are therefore not available for general employment use?</p>	<p>Yes, this is important in relation to making the maximum benefit of hosting the University of Durham here in Durham city.</p>

<p><b>Question 17</b></p> <p>What should be the extent of the proposed Aykley Heads Strategic Employment Site?</p> <p>a. Only reusing existing land currently used for employment, excluding any Green Belt land;</p> <p>b. As above but also including land at County Hall car park currently in the Green Belt;</p> <p>c. As above but also including former police leisure centre and playing fields currently in the Green Belt; or</p> <p>d. As above but only use Green Belt land when other areas have been redeveloped.</p> <p>Where relevant please set out the exceptional circumstances that exist to justify the removal of some Green Belt land?</p>	<p>We support Option (a); none of the exceptional reasons for deleting green belt land have been demonstrated.</p>
<p><b>Question 19</b></p> <p>In order to ensure the delivery of affordable housing where there are issues of viability, is it appropriate to allow some market housing on exception sites?</p>	<p>We do not agree with breaching planning rules.</p>
<p><b>Question 20</b></p> <p>Should the Plan apply more flexibility to the consideration of tourism accommodation and attractions in rural areas where it would benefit the visitor economy?</p>	<p>It is very important that policies and proposals are developed for realising the potential of tourism in Durham city and the wider County.</p>
<p><b>Question 21</b></p> <p>Are there circumstances where it would be appropriate to accept a financial contribution to be used to provide affordable housing elsewhere rather than have the affordable housing provided on-site?</p>	<p>We are not supportive of this socially-divisive suggestion. As pointed out in response to Question 3, there are different housing markets within the County, and an 'affordable' dwelling in the stronger markets can be twice the price of a dwelling elsewhere. It would be wrong to allow developers to 'decant out' those who need affordable housing.</p>

<p><b>Question 22</b></p> <p>In order to meet the housing needs of older people should we:</p> <p>a. Allow developers to make their own decisions on house types and building standards;</p> <p>b. Require developers to build a proportion of houses within housing schemes to the new optional building regulations standard aimed at making homes more accessible and adaptable. If so, what proportion would be appropriate; or</p> <p>c. Require developers to build bungalows, level access flats, multi-generational housing, sheltered housing or extra care as a proportion of all new housing developments. If so, what proportion would be appropriate?</p>	<p>We support a mixture of (b) and (c) depending on the size of the development. The proportion should probably be 10% to 20%.</p>
<p><b>Question 24</b></p> <p><b>Call for Sites</b></p> <p>Should evidence show they are required, are there any sites that may be suitable for student accommodation? Please refer to the Call for Sites document for detail on what information is required.</p>	<p>We know that there are more than sufficient sites already approved. Some may fail to develop or to succeed. Any further approvals should be on or immediately adjacent to an existing university or college academic site or hospital or research site. We further suggest that houses built for students or young professionals should be built so that they can be easily converted to houses for retirement homes and older people in general.</p>
<p><b>Question 25</b></p> <p>Do you support our intention to include the student accommodation Interim Policy in the County Durham Plan?</p>	<p>Yes. It may need 'tweaking' in the light of experience over the coming months.</p>
<p><b>Question 26</b></p> <p>Do you agree that we should assess the type and mix of housing on a site-by-site basis?</p>	<p>No, there should be guidance for the County and sub-areas.</p>
<p><b>Question 27</b></p> <p>Do the existing Green Belt boundaries serve the five Green Belt purposes of: checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns merging into one another; assisting in safeguarding the countryside from encroachment; preserving the setting and special character of historic towns and assisting in urban regeneration?</p>	<p>Absolutely, and we would add that it helps in ensuring the development of unused and derelict urban land. We enthusiastically agree with the points in paragraph 4.71 about planning positively to enhance the beneficial use of the Green Belt, and welcome the intention to include a policy to provide access, outdoor sport and recreation, enhance the landscape and improve damaged and derelict land.</p>

<p><b>Question 29</b> Are there any non-strategic sites within the existing Green Belt where a change to the Green Belt boundary would be justified? If so, for what type of development and what are the exceptional circumstances for that change?</p>	<p>Not in our opinion.</p>
<p><b>Question 31</b> Are there any significant congestion hotspots in the county that could require building a new road?</p>	<p>There are none that could justify building a new road.</p>
<p><b>Question 32</b> Does existing and future predicted traffic in Durham City have an unacceptable impact on the city?</p>	<p>Neither the traffic nor any 'solutions' must be allowed to have an unacceptable impact on the city. There are several areas that are severely affected by the appalling air pollution. There is a particular phenomenon in Durham city's levels of car traffic and parking, and this is the dramatic difference during the summer when students have taken their cars back home. Students should be told as part of the offer of a place that only those with a medical justification can bring a car to Durham.</p>

<p><b>Question 33</b></p> <p>The Draft Durham City Sustainable Transport Strategy identifies the following infrastructure measures which would create a more sustainable transport network in the city. Which measure or measures do you believe are important and why?</p> <p>a. A new crossing of the River Wear through the provision of a Northern Relief Road;</p> <p>b. Improvements to the existing city centre transport infrastructure such as to the bus station and stops;</p> <p>c. Pedestrian improvements linking the University to the city centre;</p> <p>d. Improving missing links for sustainable transport modes in and across main roads and junctions at Aykley Heads, Sniperley, Framwellgate Moor and Newton Hall;</p> <p>e. Reducing congestion by making appropriate improvements for all transport modes in Gilesgate, Dragonville, Carrville and Belmont; or</p> <p>f. Any other suggestions.</p>	<p>The strategy sets out priorities with which we strongly agree, namely 1st people on foot, 2nd people on bikes, 3rd people on public transport, and lastly people in cars. So we support options (b), (c) and (d).</p> <p>Our 'other suggestion' is that In building new housing it would be appropriate to have sustainable modes of transport and the associated infrastructure included at the planning stage.</p>
<p><b>Question 34</b></p> <p>Are measures required to address the congestion on the A167 from Nevilles Cross to Sniperley Roundabout?</p> <p>a. There are no measures required;</p> <p>b. Yes. A Western Relief Road; or</p> <p>c. Yes. An alternative proposal (please specify).</p>	<p>We are not convinced that there is serious congestion on this road. There are certainly delays and queues at peak times but these are most manifest when there are road/gas/water works. It is also recognised that congestion is one of the ways that the use of park and ride facilities is promoted. Option (a) is therefore broadly favoured, but we would add that it is important to tackle the underlying issue of reducing vehicular traffic.</p>
<p><b>Question 36</b></p> <p>Should we require new housing developments to meet the Building for Life 12 standard?</p>	<p>Yes, or whatever becomes the latest or equivalent set of standards.</p>
<p><b>Question 37</b></p> <p>Should we seek to limit the number of hot food take-aways in some locations, for example in our town and local centres (where there is an over-concentration) and/or close to schools and colleges or does this unfairly prejudice commercial interests?</p>	<p>Yes we should limit the number of hot food take-aways in some locations, and we would point to Lower Claypath as an example of over-concentration.</p>

<p><b>Question 38</b></p> <p>Do you agree that we need to address all areas of water management including flood risk?</p>	Yes.
<p><b>Question 39</b></p> <p>Do you agree with our proposed strategy to conserving and enhancing the natural and historic environment? Can you suggest any alternatives?</p>	This is of great importance to us, and we agree with the actions set out in paragraph 4.142.

## Question 15

### *Call for Sites*

*Are you aware of any sites that should be considered for allocation for housing? Please refer to the Call for Sites document for detail on what information is required.*

Durham City Neighbourhood Planning Forum has compiled a list of possible housing sites to include in the forthcoming draft Neighbourhood Plan. We have used the SHLAA 2013 register as our starting point, supplemented with information from planning approvals and in one case by our view that a low density would be more in keeping with the locality (Shell Garage on the A167).

SHLAA 2013 site reference	Site name	Site address	Housing estimate
4/DU/25	Whinney Hill former school	Whinney Hill	77
4/DU/61	Land at Sixth Form Centre	Providence Row	14
4/DU/130	John Street	John Street	22
4/DU/56	Kepier House	The Sands	35
4/DU/131	Former Shell Garage	A167 Nevilles Cross/St John's Road	4
4/DU/76	Bede College	Lower Gilesgate	58
4/DU/70	Hollow Drift	Green Lane	35
4/DU/129	Milburngate House	Framwellgate Peth	60
	Electricity Sub-Station	Sidegate	12
	Lovegreen car park	Sidegate	4
	Council-owned car park	Sidegate	30
	Former office	Diamond Terrace*	3
	Main Street USA site	Framwellgate Peth	5
	Adj Sainsbury's on A167	A167 former Pot and Glass	2
	24 a, b and c The Avenue	The Avenue	3

\* Subject to rights of way being protected.

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