

Durham City Neighbourhood Planning Forum
The Miners' Hall
Redhills
Durham
DH1 4BD

Dear Sir / Madam,

**RE: Durham City Neighbourhood Plan Consultation Draft
consultation response on behalf of Persimmon Homes (Durham).**

As one of Britain's largest housebuilders Persimmon Homes welcomes the opportunity to submit representation on the Durham City Neighbourhood Plan Consultation Draft. It is hoped that these representations will assist the Forum in taking forward a Neighbourhood Plan to examination and adoption following the referendum.

Persimmon Homes have a long established history of investing within Durham City recently completing our Charles Church site at Potters Bank and with ongoing developments at Whinney Hill, Kepier House the Sands and Aykley Heads.

In addition to our existing developments Persimmon Homes also have a number of land interests within the Neighbourhood Plan boundary and is therefore a key stakeholder in the area. Persimmon Homes fully supports the formulation of a Neighbourhood Plan for Durham City and would welcome further opportunities to assist and request to be kept fully engaged in the Plan-making process at all stages.

General Comments on the City of Durham Neighbourhood Plan

Persimmon Homes commend the significant work that has been undertaken to date by the Durham City Neighbourhood Planning Forum and particularly welcome the

provision and content of the Durham City Neighbourhood Planning Forum website which provides an excellent resource in helping to understand the community consultation exercises which have been undertaken and ensuring transparency.

Persimmon Homes' primary concern around the Neighbourhood Plan centres upon ensuring that future development sites do not become subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened and thus the ability for Durham City to grow sustainably is constrained.

Theme 1 – A City with a Sustainable Future

Policy S2 – Sustainable Development Requirements of all New Building Developments Including Renovations and Extensions

Persimmon Homes object to Policy S2 point 4. The latest update to Building Regulations introduced a requirement for new dwellings to achieve or better a fabric energy efficiency target in addition to carbon dioxide targets. In essence the issue of energy efficiency, energy generation and move toward zero carbon are no longer planning matters nor are Building Standards generally both of which are matters of Building Regulations, and as such point 4 of Policy S2 is unnecessary.

It is unclear if the purpose of the policy is to ensure new developments achieve appropriate Building Regulations as it refers to simply building standards. Due to the above points Persimmon Homes suggest that either Policy S2 point 4 is removed or amended to read: "Constructed to the appropriate Building Regulations Standard."

Theme 2B – A Beautiful and Historic City – Green Infrastructure

Policy G1 – Preserving and Enhancing Green Infrastructure

Policy G1.3 should read;

- ...2. the affected site or assets can be demonstrated to be surplus to local requirements (with e.g. reference to the current Open Space Needs Assessment); [delete and] OR
3. a compensatory amount of green assets of an equivalent or better quality is provided in, or adjacent to, Our Neighbourhood.

Persimmon Homes object the to reactive nature of Policy G1.8 point 2 which appears to suggest that on receipt of a planning application the Neighbourhood Plan will consider applying for Tree Protection Orders to protect trees. This approach would add uncertainty to developers as there would be a threat that post-submission of an application TPO's could be retrospectively applied which may fundamentally impact on proposed site layout and potentially impact on the viability of schemes which will have already required significant investment in preparing and submitting the application.

Persimmon Homes suggest that, in place of this reactive approach, a proactive policy is inserted whereby the Plan would continually seek to identify trees of TPO quality and promote their formal protection through TPO applications rather than simply relying on the threat of development from planning applications to prompt this process.

Theme 4 – A City with Attractive and Affordable Places to Live

Policy D1 – Land for Residential Development

The County Durham Plan Issues and Options (June 2016) set out three 'growth scenarios' and consulted upon four 'distribution scenarios'. Dependant upon which distribution scenario is taken forward in the emerging County Durham Plan Preferred Options early indications are that the City of Durham will need to identify residential allocation sites to deliver between 600 – 8,000 new homes.

It is appreciated that the Durham City Neighbourhood Plan is being progressed ahead of the County Durham Plan and as such it is difficult to predict an exact level of allocations required to meet the identified housing need. However it is disappointing, as the Neighbourhood Plan Area covers much of the City, given that as a minimum Durham City will need to allocate for approximately 600 new homes that the Neighbourhood Plan proposes only 3 new allocation sites capable of delivering 11 dwellings as sites 1-4 are already committed developments.

It is noted that the Neighbourhood Plan identifies four further potential allocation sites which could be delivered if current deliverability issues are resolved. However, even if all these sites do become deliverable they would only deliver 38 no. additional homes. The identification of non-committed residential allocation sites for a total of 49 dwellings will not meet the emerging housing need of the Neighbourhood area and will certainly not

provide significant supply in aiding the national objective of 'boosting significantly the supply of housing'. If additional housing sites are required in Durham City to meet the identified housing need the area runs the risk of allocations being forced upon them from a County level through the County Durham Plan.

In order to ensure that as much of the required development is directed towards sites preferred by the Neighbourhood Planning Forum it is suggested that the site allocations are revisited and further allocations are identified which maximises the ability of the Neighbourhood Plan to direct as much development as possible to sites of their choosing. In order to do so many more sites capable of delivering significantly more dwellings are required to be identified.

Policy D4 – Housing for Older People and People with Disabilities

Persimmon Homes object to D4.1 which appears to have taken inspiration from the revoked County Durham Plan "meeting the needs of older people" policy although the Neighbourhood Plan policy is less flexible than that of the CDP as the neighbourhood plan does not allow for Housing products that can be shown to meet the specific needs of a multigenerational family nor does it allow as a suitable alternative provision where this requirement would undermine the viability of the scheme.

Persimmon Homes object to Policy D4.1 as it does not incorporate sufficient flexibility in regards to development sites upon which it is not appropriate to provide elderly persons housing. Paragraph 4.159 of the Plan supports this point in stating that "new provision for older people should meet particular criteria relating to access to shops, medical services and other essentials, either by being close to or by being on a readily accessed public transport and appropriately designed and sited footpaths". Clearly development sites which do not or cannot meet these criteria are not suitable for the delivery of elderly persons housing. As such, if the policy is to be retained, greater flexibility should be inserted into Policy D4.1 in consideration of this point.

Persimmon Homes object to policy D4.1 as, although the Strategic Housing Market Assessment identifies that older people would like to move to other types of housing, it is unclear as to why the requirement is 10%. Further it is Persimmon Homes' market experience, as is reflected in the SHMA, that the majority of elderly people do not want

to move to “Elderly persons housing” and in fact wish to stay in their own home. This point is backed by the Durham County Council SHMA report 2016 paragraph 6.9.

In justifying Policy D4.1 the Neighbourhood Plan states at paragraph 4.156 that “Locally, it has been highlighted in our consultations as a key issue for our Neighbourhood Plan”. However conversely a lack of elderly persons housing offer is not listed as a frequent comment in answer to either the “what is Bad about Durham City Centre” or “What Needs to Change” Neighbourhood Planning Forum consultation responses noted at paragraphs 3.6 and 3.7 of the Plan. Further in reviewing the ‘Durham City Neighbourhood Planning Forum (2015) The public’s views. Results of priorities’ document it can be seen that of the 40no. issues raised in response to topic of housing only 2no note a need for bungalows or housing for older people. Therefore it is clear that the need for ‘Elderly persons housing’ is not a specific issue priority for the Neighbourhood requiring a specific policy response.

Further to the above, throughout the previous County Durham Plan process, Persimmon Homes objected to the “Elderly Persons Housing” policy as insufficient consideration had been given to the implications of the policy on the economic viability of development sites. The NPPF is clear in paragraph 173 that “Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking” adding that “Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened”. In reflecting the CDP ‘elderly persons housing’ policy this concern around impact on development viability within the city remains.

As there is no clear justification for percentage of Housing for Older People required or clear evidence that the policy will not impact on the economic viability of development in the neighbourhood Persimmon Homes object to Policy D4.1 and must insist that the policy is removed or replaced by an appropriately worded policy which simply encourages the provision of Older Persons Housing as part of an appropriate housing mix informed by the latest up-to-date SHMA.

Policy D5.1 – Meeting Other Housing Needs

Policy D5.1 should be amended to allow some flexibility in the affordable housing provision where economic viability issues arise and are evidenced either through the ability to provide a reduced affordable housing percentage and / or through a flexible approach to the affordable housing mix.

Persimmon Homes suggest that policy D5.1 is amended to require an affordable housing percentage in accordance with the latest up-to-date evidence of need and viability. By specifying a percentage within the policy there is a risk that it becomes out-of-date as and when new Strategic Housing Market Assessment's are undertaken which may evidence the need for an alternative affordable housing percentage.

Policy D6.2 – Design of New and Renovated Housing to the Highest Standards

Persimmon Homes seek clarification in regards to Policy D6.2. It is unclear if the policy will require all developments to seek Building for Life accreditation. Persimmon Homes feel it would be more appropriate for the policy to require all housing developments to be designed in accordance with the principles of Building for Life, or any other national standard of equivalent or higher level.

Theme 5 - A City with a Modern and Sustainable Transport Infrastructure

Policy T3 – Residential Car Parking in the Controlled Parking Zone

Persimmon Homes welcome the policy approach of T3.1 which seeks to offer greater flexibility to parking standards in sustainable city centre locations. However the policy needs to be adjusted to a 3 tier approach as the County Durham Parking Standards set a standard of a maximum requirement of 1 space per dwelling within 400m of the Market Place. Any development within this catchment should be free from the requirements of Policy T3.1 in justifying a parking provision below the minimum parking standard currently applicable to sites beyond 400m of the Market Place.

The justification test within Policy T3.1 should only apply to sites within the Controlled Parking Zone beyond 400m of the Market Place. This would represent the 2nd tier. Test 2 requirement of “demonstrating that genuine demand exists for car free or low car housing in the proposed location” should be deleted as this would be difficult to evidence and the justification for reduced parking stems from intrinsic sustainability and promotion of sustainable transport patterns rather than demand for parking.

The 3rd tier of sites shall be those beyond the controlled parking zone which should be subject to the County Durham Minimum Parking Standards.

Policy T4 – Residential Storage for Cycles and Mobility Aids

Persimmon Homes contend that Policy T4 is wholly unnecessary and will add an unnecessary and unjustified additional burden to development for the following reasons.

As currently drafted the policy would require each dwelling to provide a covered area, sufficiently large to store 2 bicycles with a power supply to charge electric mobility aids and e-bikes. It is noted that paragraph 4.209 states that “in houses with garages, cycle and mobility aid storage may be catered for by simply providing extra garage space”, Persimmon Homes would object to the need to provide “extra garage space” as it should be noted that Durham County Council do not count garages as parking spaces and therefore they are deemed to be used purely for storage purposes therefore the need to provide extra space to store specific items is unnecessary and unjustified.

Providing “extra garage space” would render integral housetypes undeliverable within the Neighbourhood and would unnecessarily impact on the development viability and affordability of homes through increasing build costs. For new homes provided with a garage this policy requirement should be met simply through the provision of a standard sized garage.

For dwellings where no garage is provided this option would not be available to meet the requirement and further provisions would have to be made.

As modern buggies and prams are both costly and collapsible it is considered that occupiers would store these items indoors and as such the need to provide an outdoor space for their storage is unnecessary. Similarly given the cost of powered wheelchairs and mobility scooters and the value of them to their users in terms of facilitating their mobility it is again unlikely that occupiers would store these items outdoors due to the threat of them being stolen.

Therefore it remains that the only item listed likely to be stored outdoors would be bicycles. As such the need to provide a power supply would fall away. In addition to this

however Persimmon Homes feel it is wholly inappropriate and unjustified to require all new dwellings (without a garage) to provide two covered cycle spaces as on moving into their new home purchasers will have the option of placing a shed or installing a cycling loop to secure their bicycles to in their own rear gardens if they have the need for such a provision.

Being forced to provide this to every new dwelling regardless of the occupiers need or demand for such a provision will seek only to increase house prices of new homes, reducing affordability, and increase the overall development cost, potentially to detriment of the viability. The proportion of purchasers who firstly own a bicycle and secondly wish to securely store it outdoors can install their own preferred form of storage as and when they see fit.

For the above reasons Persimmon Homes request that Policy T4.1 is deleted.

Concluding Comments

Persimmon Homes fully support the perpetration of a Neighbourhood Plan for Durham City that fully accords with the principles of the NPPF and plans positively for the sustainable growth of the City. As a key stakeholder in the future development of Durham City we would welcome the opportunity to engage and assist in the formulation of the Durham City Neighbourhood Plan.

I hope that the above information is useful, if you require any further assistance please do not hesitate to contact me.

I look forward to hearing from you.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Adam McVickers', with a long horizontal flourish extending to the right.

Adam McVickers
Planner

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