

COUNTY DURHAM PLAN: GREEN BELT ASSESSMENT SCOPING PAPER

Comments from the City of Durham Trust

INTRODUCTION

Trustees understand from the Authority's Strategic Planning Team that no response is expected to this part of the emerging County Plan, but that opportunity for comment is provided on the Core Strategy [CS] document in Questions 4a, 5a and 6, besides 64. Nevertheless, Trustees would like to make a submission since we are both puzzled and concerned at this Scoping Paper. We are puzzled as to whom the Green Belt Assessment Scoping Paper [GBSP] is addressed. Perhaps it is intended for the reader of the CS, since the CS contained only a single sentence (5.28) mentioning "an initial scoping study" (although the reader was not referred to or directed to this study). Accompanying it, the CS had a map headed 'Potential Durham City Areas of Search' (although the scale of the map, c.3miles to the inch, with stars marking the 'areas', was useless for any meaningful inspection. On the other hand, the maps in the BGSP are no better.)

Trustees' concerns with regard to the GBSP are even more important than the above-mentioned puzzlement.

SPECIFIC COMMENTS

1. Every page of the document has 'Green Belt Methodology' printed along the top and 'Green Belt Assessment Scoping Paper' along the bottom. We suggest both are quite inappropriate. It is certainly not a 'Green Belt Methodology'. (If it were called 'Durham City Green Belt Methodology', it would be more locationally precise, since the GBSP omits the County's North West Green Belt, but it would still be misleading.) The document is an 'Assessment of Environmental Constraints for Housing Development within 5km of Durham City'.
2. The present document is premature. A second, accompanying study for Option B offered in the CS should have been presented alongside. The Authority may prefer Option A, but an either/or choice is presented in its concurrent consultative CS, which is concerned with, indeed, headed "issues and options." The GBSP, without qualification, assumes Option A is the plan to which the Authority is already working.
3. The present document springs from an inaccurate housing forecast. The housing predictions of the Strategic Housing Market Assessment is dated October 2008, ie before the current severe economic downturn could be predicted. Economic forecasts made at this time are now seriously wrong. The estimates – and requirements – should therefore be revisited and

downgraded. The pressure on the Green Belt stemming from Option A needs similar easing.

4. Green Belt designation is not fundamentally about landscape quality. Yet both Table and maps indicate that it is. Thus, the categories of ‘Constraints and Significant Constraints’ (Table 1) - natural environment, landscape, historic, public open space, hydrological – confirm that this document is not an assessment of the Green Belt, but ‘An Assessment of Environmental Constraints for Housing Development.’ The accompanying three maps reinforce this to be the case. On none of these maps is the Green Belt, or its boundary, actually shown.
5. Green Belts have a degree of permanence. Durham’s Green Belt is of recent origin. In its *Local Plan*, following Planning Policy Guidance, Durham District stated that “It is the council’s intention that the green belt boundaries defined on the Proposals Map should remain permanent and unchanged beyond the current Plan period” (para 3.18). It is hardly following Planning Policy Guidance to seek to reduce the area of Green Belt at the first opportunity. Moreover, the present Durham Green Belt was hardly a generous allocation and was only achieved after the County Authority’s niggardly approach (See *County of Durham Structure Plan Review Deposit Plan*, November 1995, Figure 12).

CONCLUSION

Trustees’ views on Durham’s Green Belt, reinforced by our stated preference for Option B, were spelled out in answers to the CS document. We would ask you to refer to them when collating responses to the County Plan. We would also ask you to cross-refer the comments made here, to the GBSP, to our relevant answers to the CS document. In summary, if the GBSP supplements the summary statements in the CS, in like manner the comments here supplement those given on the Green Belt in our CS submission. Thank you.

Submitted on behalf of Trustees by D.C.D.Pocock (Dr)

Hon Sec., City of Durham Trust

Email Address: douglas.pocock@lineone.net

Registered Office: c/o Blackett, Hart & Pratt, LLP

Kepier House

Belmont Business Park

Durham, DH1 1TW