

# THE CITY OF DURHAM TRUST

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Mr S. Timmiss  
County Durham Plan  
Durham County Council  
Civic Centre  
Chester-le-Street, DH3 3UT

9th February 2011

Dear Mr Timmiss,

## **County Durham Plan: Consultation Report: Durham City Green Belt Assessment Phase 2**

Trustees would like to make several general comments before answering the few specific questions with which this document ends. The accompanying Appendix, from the *City of Durham Local Plan - Inspector's Report* (2002), is submitted as an integral part of this submission.

### **GENERAL COMMENTS;**

1. Trustees are surprised that the County Plan contains a document – indeed, the largest document – devoted to the Green Belt when (a) it is less than a decade since the open land around the City was examined in detail for designation as Green Belt, (b) PPG 2 states that in their designation “the essential characteristic of Green Belts is their permanence” (para 2.1). Central government policy was strongly reiterated at local level in chapter 3 of the *Inspector's Report* of the Local Plan (See Appendix).
2. Trustees are even more surprised when it is evident that the sole reason for a Green Belt document is to examine the designated area for housing development, since PPG 2 specifically excludes the scale of new housing sought (para 3.4). The *City of Durham Local Plan – Inspector's Report* repeated the primacy of the Green Belt in his chapter on ‘Housing Strategy’. His words are highly relevant: “its [Durham’s] unique character and setting makes it physically and environmentally unable to absorb new housing at levels which market forces might indicate. It is largely for these reasons that the Green Belt has been proposed.....Housing development which extends either into the countryside surrounding the City, or into important open spaces or undeveloped areas within it, will be resisted” (paras 4.9, 4.10). The whole exercise in this document, then, is conducted, not in relation to central government policy, but in spite of it: not as an interpretation of it, but in disregard of it.
3. A concentrated ‘attack’ on the Green Belt stems entirely from the County Authority’s proposal to focus development on the City and to confine search for sites for 5050 new dwellings within a radius of 5 km of the City centre. Such a radius, as the Authority’s earlier *Green Belt Assessment Methodology* document stated, contained only “a small amount of non-Green Belt undeveloped land” (1.4). This

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situation, which stems from the fact that the Green Belt “is tightly drawn around the urban form of Durham City” (*Durham City G.B. Assessment Phase 2*, para 2.34), is surely the strongest reason for not targeting the designated area.

4. The scoping-screening-analysing strategy undertaken here is described in the earlier *Methodology* document as “about the accommodation of a certain amount of housing in a certain area” (1.24). The “amount”, 5050 units, is that of Option A given in the *Core Strategy: Issues and Options* document. Alternative, less damaging options, given little space in the *Core Strategy*, are totally ignored here. – This, despite the fact that responses to the Authority’s *Core Strategy* showed that 60% opted for Option B or a further alternative strategy. The analysis in this document shows that the sites selected could “theoretically accommodate” more than 12,000 dwellings. The decision to progress with only certain sites sufficient to provide 5289 units would be an indication of reasonableness if this were not an exercise undertaken in Green Belt. The unreasonableness is reinforced in the sections which appeared in the original version of this document but which were omitted from the revised document when re-issued.
5. In addition to having no real mandate to focus exclusively on its favoured Option, the Authority has put forward no empirical evidence to support that same narrowly-focussed strategy..
6. A final general comment relates to the nature, indeed, possible legality, of consultation on this document. It has been available only to those members of the public with access to - and user-knowledge of - computers. No paper copies were issued, in contradiction of the Authority’s *Statement of Community Involvement* (May 2010) which promised availability in “council-run local and mobile libraries” besides council offices (Appendix B).

## QUESTIONS.

The brief answers to the Questions arise from the above comments, together with the lists of ‘cons’ to each site given in the document, plus the ‘residual impacts’ given in the first version of the document.

Q1. We do not agree that Sites at Sniperley Hall, North of the Arnison Centre (parts i,ii,iii), Sherburn Grange, south of Belmont (part i), South of Sherburn Road, Merryoaks and Mount Oswald should go forward to the next stage.

Q2. Yes, the reasons given are robust for not progressing Site 2 (Newton Hall, parts iv,v), although the primary reason in the opinion of the Trustees is the encroachment into the Green Belt.

Q3. Yes, the reasons given are robust for not progressing Site 3 (Whitesmocks), although the primary reason in the opinion of Trustees is the encroachment into the Green Belt

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Q4. Yes, the reasons given are robust for not progressing Site 4 (Ramside), although the primary reason in the opinion of the Trustees is the encroachment into the Green Belt.

Q5. Yes, the reasons given are robust for not progressing Site 5 (South of Belmont, part ii), although the primary reason in the opinion of the Trustees is the encroachment into the Green Belt.

Q6. Yes, we agree that “the sites listed above should not go forward to the next stage of the Green Belt Assessment.”

## APPENDIX

Trustees wish to include the accompanying appendix, which is part of chapter 3, ‘Environment’, of the *City of Durham Plan – Inspector’s Report (2002)* as part of its submission. The Inspector’s comments and reasoning in both the ‘General Approach’ and ‘Individual Sites’ in the Green Belt are material concerns to the Authority’s present document.

Yours sincerely,

D.C.D.Pocock (Dr)  
(Hon Sec)