

Representor ID: 365591 Comment ID: 3754

Matter 7: Durham City Strategic Housing Sites (Policy 8)

1. The Trust stands by its 2013 response to the Pre-Consultation Draft. There are two attachments that are integral to our arguments; these are the original version of the *Durham City Green Belt Site Assessment Phase 2*¹ and our paper on the *Site Selection Process*². If these are not to hand the footnotes show where on the Consultation Portal they may be downloaded from or alternatively the Trust can provide copies – the maps at the end of the *Site Selection Process* really need to be seen in colour.
2. The other attachments are the raw data used in preparing our response and high resolution copies of the maps. These are not needed to follow our arguments but are provided so that our workings can be independently checked.
3. We refer to our submission on Matter 5 as the arguments made there also apply here.
4. We have reviewed the documents published since the consultation closed on the Pre-Consultation Draft. The *Assessment of Impact of Strategic Sites on Durham Conservation Area and WHS* [R22] is something that should have been prepared much earlier in the process, and used in the assessment of other sites beyond the Green Belt. To produce it now (it is dated 17 April 2014) is an attempt to justify a decision already taken, not to help build an evidence base upon which a decision may be made.
5. It is quite clear that the “exceptional circumstances” were formulated well after the decision had been taken to remove the strategic sites from the Green Belt. As paragraph 4 of our submission shows, it was actually a question to Council from a Trustee that triggered this, and the first appearance in the formal documentation was not until the 2012 *Durham City Green Belt Site Assessment Phase 3* [R29] at paragraph 1.5. Search the 2010 *Durham City Green Belt Site Assessment Phase 2* [R30] and you will not find the phrase “exceptional circumstances”. The 2010 *Core Strategy Issues and Options Paper* (not in the Library) is referred to at paragraph 1.2 of R30 for the reasons. That document does acknowledge the need for exceptional circumstances but does not identify them. Again we see an attempt to justify a decision already taken.
6. The two previous paragraphs indicate a failure to positively prepare the case for Green Belt deletions, as the requirements have not been objectively assessed. It also fails the justified test as the decision to restrict the site search to a 5km radius is not justified.
7. The aforementioned original version of the *Durham City Green Belt Assessment Phase 2* (December 2010) was promptly withdrawn and replaced with the near-identical R30 in which the “residual impacts” - all negative - of sites have been removed. The following is mentioned for the Ramside site, but clearly applicable to all, in the first version only:

1 See <http://durhamcc-consult.limehouse.co.uk/file/2874686>

2 See <http://durhamcc-consult.limehouse.co.uk/file/2776216>

THE CITY OF DURHAM TRUST

Supplementary submission to the County Durham Plan Examination in Public

“Because **the ambition is to generate large amounts of revenue** for infrastructure projects, it is unlikely that there would be enough money for the development to include”

(Emphasis added).

The first version³ is attached to the Trust's submission on Policy 8 (Comment ID 3754) and the edited version is in the Examination Library Part 1, reference R30.

8. The *Durham City Strategic Sites and Infrastructure Delivery Strategy Cabinet Report* [R20] gives those financial details. Over the 25 year period 2015/16 to 2039/40 the Council anticipates a net capital receipt of £16.6m (Appendix 3) and a net revenue income of £64m (table 3). At the end of the Plan period there would be continuing council tax receipts of £4.8m and business rates of £9m pa (paragraph 33). It is the Trust's belief, bolstered by the reference in the original version of R30, that these financial benefits are a significant driver in the decision to seek Green Belt deletions.
9. In particular, R20 shows that the Council stands to make £7.3m from the sale of its land holdings at Sniperley (paragraph 24(xiv)). This represents a major conflict of interest. The Sustainability Appraisal's *Appendix C - Sustainability Ranking of all Potential Housing Sites Screened* [K39] puts the Sniperley Park sites 4/DU/101 and 4/DU/102 at position 446 out of the 464 sites listed, which is the bottom 4%. Would this site have been proposed if the Council did not have such extensive land holdings there?
10. The main arguments against releasing the other two Strategic Sites are made in our Comment ID 3754.
11. The Council's suggestion in C1 that a more dispersed approach to development would be less sustainable has been dealt with in general in our comments on matter 3: if employment is also dispersed then the result need not be less sustainable. In any case, our *Site Selection Process* shows that there are sites outside the Green Belt that are as accessible to key employment sites in the City as these Strategic Sites.
12. There is also an assumption that new jobs will come to Durham City in step with the build out of the Strategic Sites. In practice the houses will come first, and the two Northern Sites in particular would be likely to house people commuting to Tyneside.
13. Finally, as has already been noted, the *Sustainability Ranking* [K39] puts Sniperley Park at number 446. North of Arnison is also in the bottom third at 329. We accept that the Sherburn Road site at 31 has a good sustainability score, but the other arguments against releasing this site still apply.

Changes sought

14. In order to make the Plan sound Policy 8 should be deleted in its entirety. The three Strategic Sites also appear as allocations H1 H2 and H3 in Table 12 following Policy 30. They should be removed there too.

³ Direct link: <http://durhamcc-consult.limehouse.co.uk/file/2874686>