

## Letter of Objection to the Durham Plan from Councillor Nigel Martin

*Dear Mr Timiss,*

### **Merryoaks Housing Allocation (4/LB/05)**

I wish to register my objection to the inclusion of the allocation of 250 houses on the site referred to in the plan as located at Merryoaks.

I am one of the elected County Councillors for the Neville's Cross Division in which the site lies. I have been the elected County Councillor for the area continually since May 1985 (over 28 years), and know the area well.

My objections are based on (a) green belt impact, (b) traffic impact, and (c) community impact.

### **Green Belt Impact**

1. The County Durham Plan has been constructed with a strategic aim of making Durham City a 'development hub' [my words] for County Durham. The Plan argues that this aim requires a significant increase in housing around Durham City, to which end it identifies several 'strategic housing sites' [its words] around the city at Sniperley, North of Arnison and Sherburn Road.

2. The Plan uses the strategic nature of these proposals to justify the removal of green belt status for the three areas concerned. Within the earlier development of the Plan, no other sites were identified as 'strategic', and the Merryoaks site was explicitly excluded from housing allocation. The latest version of the SHLAA states that "the site was only deemed unsuitable in the [earlier versions of the] SHLAA on count [*sic*] of it being located in the green belt".

3. The stated reason for the late inclusion of the Merryoaks site for housing is due to a submission by Persimmons Homes dated July 2013 in which the company provides a new traffic impact assessment for the development relying on the proposed Western Relief Road. This assessment, provided by Milestone Traffic Planning (MTP), is claimed to give sufficient evidence for the site now to be included as a viable housing site in the Plan.

4. The MTP assessment is based on existing data and it is clear that the Council could, if it had so desired, have commissioned such an assessment itself when considering whether to include Merryoaks at an earlier stage.

5. The fact that the Council chose not to commission such an assessment itself, is clear evidence that the Council has never viewed the Merryoaks site as having

intrinsic **strategic** value in relation to the economic development policy embedded within the Plan.

6. As there is no evident strategic role for this site, and since it lies within the boundary of the existing Green Belt, there is no reason why the legal protections of the Green Belt in this area should be overturned and changed, otherwise the whole principle of Green Belt as long-term protection for certain areas of the countryside is undermined at a fundamental level.

7. On this basis the inclusion of the Merryoaks site for housing in the Plan is wrong and is objected to.

### **Traffic Impact**

8. As stated in para. 3 above, the MTP traffic assessment is crucial to any decision on housing provision on the site. While not wishing to challenge the base traffic numbers into and out of the site at peak times in numerical terms, I do wish to challenge the claimed routes that would be taken by drivers in certain cases.

9. In particular, it is claimed that significant numbers of vehicles travelling to the centre of or to the East of the City will choose to take a route that goes south to the Cock of the North roundabout, then by the A177 (South Road) to the New Inn traffic lights and then east along Stockton Road. This would be perverse behaviour.

10. In the mornings, weekday traffic habitually backs up along South Road up to and often past the current entrance to Mount Oswald. On the other hand, the inward route from the Duke of Wellington lights down Potters Bank is relatively queue-free and would certainly be the route of choice for any resident from Merryoaks, even with a queue to the lights at the Duke of Wellington (where there is some right-turn lane capacity).

11. Conversely, in the evening, there is usually a long slow-moving queue **up** Potters Bank to the Duke of Wellington lights, and anyone driving from Stockton Road, to the New Inn lights would surely choose to go up South Road, via the Cock of the North and back to Merryoaks along a relatively uncongested route.

12. These two examples of the outcome data fail to fit with common sense, and must therefore place the exercise under challenge.

13. The MTP assessment also appears to ignore the impact of the already-approved development on Mount Oswald. In discussing highway capacity on Page 5 of the MTP document, it states that “the need to carry out junction modelling assessments will be informed by future year forecast flows and committed development traffic generation within the vicinity”. It then notes that these include Mount Oswald and Browney Lane.

14. The phrase “future year forecast flows” appears to imply that the cumulative effects of such flows have not been taken into account in the MTP modelling.

15. In addition there are other minor sites in the area (22 houses on Potters Bank and 14 on Redhill Lane) that are currently being built, together with a projected student hall for 450 residents on the nearby Sheraton Park estate, which have also been ignored in the assessment. The last may not generate a large amount of resident traffic, but it will generate service and staff traffic movements.

16. I believe, therefore, that the evidential base for the traffic assessment is fundamentally flawed and cannot be relied on as a basis for including Merryoaks as a large housing site in the Plan.

17. In any case, the impact on the New Inn junction is unsustainable. The following is an extract from the report to the County Planning Committee in February 2013 on the outline application to develop Mount Oswald:

“The [Mount Oswald] application site is considered to be in a sustainable location in terms of proximity and connectivity to Durham City Centre. However, both the A177 and A167 become heavily congested at peak periods and can suffer traffic delays. This is particularly true of the A167/A690 Neville’s Cross junction, and the A177 New Inn junction. Both are traffic light controlled, at peak times operate close to or at capacity, and are constrained in terms of improvement by buildings and infrastructure.”

18. The MTP assessment indicates 91 additional AM peak period traffic movements through the New Inn junction and an additional 85 PM peak period movements through that junction.

19. While mitigation procedures were required as part of the Mount Oswald approval, development of the Merryoaks site would necessarily imply a further step change in the pressure on the New Inn junction that is clearly unsustainable.

20. For this reason the Merryoaks site is objected to as a housing site.

### **Community Impact**

21. I believe that there has been insufficient consideration given to the impact of newhousing on the community infrastructure of the Neville’s Cross area over the past 30+ years.

22. Defining the “Neville’s Cross area” as that covered by the former Neville’s Cross CityCouncil ward (currently polling districts DFA and DFB), in 1980 there were around 990 housing units. At July 2013 there were around 1,520, an increase of over 53%.

23. At this moment there are 36 houses under construction (Redhills Lane and Potters Bank) and outline permission has been given for around 295 more on Mount Oswald. These will bring the total to around 1,850 properties, an increase of over 86% since 1980.

24. Development of 250 further properties would bring the increase to over 110% on the 1980 figures. On top of that, a planning application is expected imminently for a student hostel catering for around 450 university students to be built on Sheraton Park within the Neville's Cross area.

25. On the other hand, since 1980, the area has lost three petrol filling stations, its only postoffice, two corner shops (one now a private house and the other a lettings agency) and one public house (replaced by a restaurant and some sheltered housing).

26. A second public house at the northerly end of the area is to close in the near future to be replaced by a Sainsbury's local, and the Mount Oswald development promises a second local convenience store near to the Merryoaks site but on the other side of the A167.

27. In terms of public recreational space, the only facility is the Lowes Barn playing fields on Park House Road with a range of children's play equipment, a MUGA, a bowling green and a football pitch of a quality that is just playable. Apart from the MUGA, this is essentially the same as in 1980.

28. Further open space and some additional play equipment is promised for Mount Oswald, but a major objection from me at Planning Committee was the lack of provision of any significant public park/recreation area as is present in almost every community of a similar size that one visits anywhere in Britain.

29. The current county council division of Neville's Cross is probably unique in County Durham in having no community centre or community building apart from local schools, and while the planning application for Mount Oswald promised provision of a community building on the Lowes Barn playing fields, there is little space for something of a size that the area needs.

30. The new housing currently being built, together with Mount Oswald and Merryoaks will result in around 580 new properties in the area. Using a nationally recognised conversion ratio (0.25 primary age children per household), this would require the provision of around 145 additional primary school places in the area, equivalent to around 5 new classrooms. While two additional ones are currently planned between Neville's Cross and St Margaret's primary schools, it is hard to see where the extra three could be physically accommodated. Nothing appears to be planned to bridge this gap.

31. The above describes an area that has grown immensely over the past three decades, and will grow further, but with arguably fewer community facilities now than 30 years ago. By any reasonable definition, the provision of a further 250 houses in the area fails the sustainability test and should therefore be rejected.

## **Summary**

32. The Merryoaks Housing Allocation (4/LB/05) should be removed from the County Plan because:

- a. It is not a strategic site and so there is insufficient reason to override its current green belt status;
- b. The traffic impact assessment provided by Persimmons is flawed and unreliable;
- c. The traffic impact on the New Inn junction is unsustainable; and
- d. The cumulative community and social impact on the Neville's Cross area is unsustainable.

Yours sincerely,

*Nigel Martin*