

## LETTER OF OBJECTION TO THE DURHAM PLAN

*Dear Mr. Timmiss,*

### **Formal Objection to the pre-Submission Draft of the Durham County Plan**

Please accept this letter as an objection to the Plan. I consider that the Plan is 'unsound' and procedurally non-compliant for the following reasons.

1. By focussing economic growth on Durham City at the expense of other parts of the region more able to absorb growth it damages the City irretrievably and neglects other parts of the County requiring investment. The Plan claims that the City must achieve some 'critical mass' to make it a city of regional, national and international importance. The City already has that status. To overload this important and historic City with unnecessary physical development would actually diminish its international reputation and bring into jeopardy its World Heritage status. By focusing on Durham City the Plan has neglected other parts of the County that need industrial expansion and economic growth, areas that have the space for this without causing environmental damage. The Plan is therefore unsound.
2. By using unrealistic forecasts for job creation, population and housing development, and by manipulating a POPGROUP forecast programme, you have predicted 15,000 people of working age will move to the County by 2030 contributing to a population growth of 37,000, or three times the anticipated growth trend. This translates into a theoretical need in Central Durham for 8,010 additional dwellings with 4,000 dwellings and a new employment site in the Green Belt. These figures cannot be sustained and seem to be in response to pressures imposed by the building lobby. The unwillingness of the Council to consider reasonable alternatives, such as the widely publicised moderate growth alternative, is contrary to national policy. Because of these significant inaccuracies in population estimates and their inept application to future housing needs the Plan is unsound.
3. Building houses in the Durham Green Belt is contrary to national policy because the combined impact on the Green Belt has not been assessed before proposing the Sniperley, Sherburn Road, Merryoaks and North of the Arnison Centre sites. The Council has also attached insufficient weight to limiting development to the brownfield sites within the City and to encouraging development in towns and villages beyond and outside the Green Belt. The lack of effective co-operation with neighbouring local authorities concerning anticipated population changes and housing targets is likely to lead to competition to provide housing for commuters to Tyneside, Wearside and Teesside, including houses in the Durham Green Belt. The lack of regional co-ordination and the adverse outcomes stemming from this is irresponsible.

Durham County does not sit in a vacuum separate and independent from the rest of the North East of England. The Plan is procedurally non-compliant and unsound.

4. Promoting road building in the Durham Green Belt, on the back of planning gain, is unacceptable. To fund the roads we have to build the houses, many of them. Which means that we have to consume Green Belt land. The argument is circuitous, closed and self sustaining and is unrelated to need. This interdependent proposal disregards the protection of Green Belt, encourages car dependency, ignores threats of climate change and scarcer resources including energy and agricultural land and is contrary to the Council's own sustainable transport strategy and national policy. The Plan is unsound.

5. The draft plan lacks any attention to the relationship between the City and the University. Its *laissez faire* attitude to this important aspect of central planning and housing/accommodation needs is unacceptable as is the total absence of any strategic approach to the longer term relationship between the county council and the university. This is planning *in absentia*. The future evolution and control of HMOs and their impact on a once vital city centre now reduced to a periodic dormitory is particularly unsatisfactory. The Plan is unsound.

6. In adapting sustainability appraisals to justify proposals these appraisals must be impartial. They must not be used to sustain a chosen and pre-selected strategy and associated policies. The proposed strategy to build 4,000 houses and 2 relief roads within the Green Belt cannot meet even the most basic test of sustainability nor should it be assessed as "achieving sustainable development". It is simply unsound practice.

Without major amendment the emerging Durham Plan is not fit for purpose and represents a major disservice to the people of County Durham now and in the future. Please record my formal objection to this Plan and kindly confirm that you have received this objection.

Yours sincerely

*Grenville Holland*