

COUNTY DURHAM PLAN EXAMINATION IN PUBLIC

Introduction

In its present form the Durham County Plan is **unsound**. It rests in part on the government's NPPF, a document that is no more than an extended essay outlining present thinking on planning direction in the UK. Such a document can only provide general guidelines. Essential and definitive details must be introduced by the local planning authorities.

The County Plan must therefore serve the needs of Durham County, and do so in a self-sustaining manner, and must have sufficient depth and detail to manage the individual affairs of the many and varied communities that make up this County. Unfortunately, in its present, highly abbreviated form, the County Plan lacks the necessary depth or detail to fulfil the widely differing needs and aspirations of the communities that make up this county. The Examination in Public will be carried forward during October with a consideration of the Durham Plan in stages, under the heading of "Matters" relating to groups of policies. Below is my contribution to this debate.

Matter 4:

Policy 3: Quantity of New Development / Comment ID: 1169

Policies 2, 3 and 4 are inter-linked and seek to establish a scheme for allocating land for housing and employment focusing a significant part of this on Durham City. They reveal a fundamental misunderstanding of Durham City, its land, housing needs and opportunities, and commercial setting. Durham City is essentially an administrative centre and is also driven by a strong academic growth pattern in an ecclesiastical setting. We do not build railway engines or motor cars in Durham City and we do not need that level of manpower for such purposes. There are small opportunities for commercial growth, for example at Aykley Heads, but this will not generate a large work force but rather a team of specialists drawn either locally or from outside the area. Even some of our County Council officers live in York and travel daily to Durham City. The proposal to create 5220 houses in Durham City (p 39) will not be met with some 6,000+ new jobs created in the city and the majority in those households will have to commute elsewhere in search of employment. The equation simply does not add up.

Most of these plans pivot on a population growth assumption (4.12, p. 31) calculated using a computer programme POPGROUP. Using this computer technology, whose central equation can be calculated on the back of an envelope, the Council estimate a population increase (4.23) from 513,000 to 560,700 by 2030. There is no evidence whatever to sustain this assumption, **Appendix 1** below.

Furthermore, Durham County is not an island and similar calculations are being made in many other counties up and down the country, including our immediate neighbours, with the same outcome. In fact the primary increase, as health care improves, will be with an aging population and their welfare should have been built into the policies, **Appendix 1** below.

Because policies **2, 3 and 4** are built on insecure data they are **unsound** and must be rewritten using more robust modelling, identifying growth areas (eg Hitachi, Nissan) and sustainable housing needed for regeneration in the village communities, especially those inherited from past mining activities. The former Durham District Council achieved this over a decade ago and won national recognition.

APPENDIX 1: Notes on the Population Predictions for the County of Durham

In the County Plan, housing needs, that drive policies 2, 3 and 4, 6, 8, 9 and 10 are determined using predicted population levels by 2030. There are several estimates of this population 16 years from now and the Office for National Statistics (ONS) suggested very little change over that period, figures that were used in the Regional Spatial Strategy. Until 2012 the County Council officers agreed with those estimates.

During the construction of the County Plan, however, these estimates changed dramatically as the County Council sought to justify the proposal to construct 22,500 new houses without regard to the number of empty properties available in the County and without regard for the brown field sites which offer some capacity for development.

The POPGROUP Calculation:

To achieve an estimated increase of 47,700 residents the County Council used a formula and associated computer programme provided by Manchester University (POPGROUP). The formula is:

$$P_{t+1} = P_t + (B - D) + (I_{UK} - O_{UK}) + (I_{OV} - O_{OV}) \quad \dots\dots(1)$$

births deaths immigration exodus immigration exodus
 County Durham from United Kingdom from Overseas

This simple equation contains 3 non-linear components:

(B - D) can find some expression from the ONS data and is generally agreed to be a diminishing number when plotted against time, also Table 1. It is predicted to be approximately zero by 2030. Therefore this is a non-linear function made up from two independent variables, $\delta B/\delta t$ and $\delta D/\delta t$ where t = time.

($I_{UK} - O_{UK}$) is unpredictable and depends on variables that lie outside the county and outside its control, for example the economic success or otherwise of neighbouring counties or more rapid improvements in the economies of the south east of England or elsewhere attracting outward migration. In this estimate Durham County cannot be treated as an island behaving independently of all other regions of the UK. Again we have two independent variables $\delta I_{UK}/\delta t$ and $\delta O_{UK}/\delta t$ over which there is no control because both variables depend on many external influences as yet undefined.

($I_{OV} - O_{OV}$) is equally unpredictable and depends mainly on the future development of economies overseas, particularly in Europe and especially in Eastern Europe. A rapid improvement in the economies of Eastern Europe could reduce this parameter to a negative value. UK withdrawal from the EEC (which is in the political frame) would certainly demolish this parameter. Again Durham County is not an island.

Once more there are two independent variables $\delta I_{ov}/\delta t$ and $\delta O_{ov}/\delta t$ essentially outside the range of prediction.

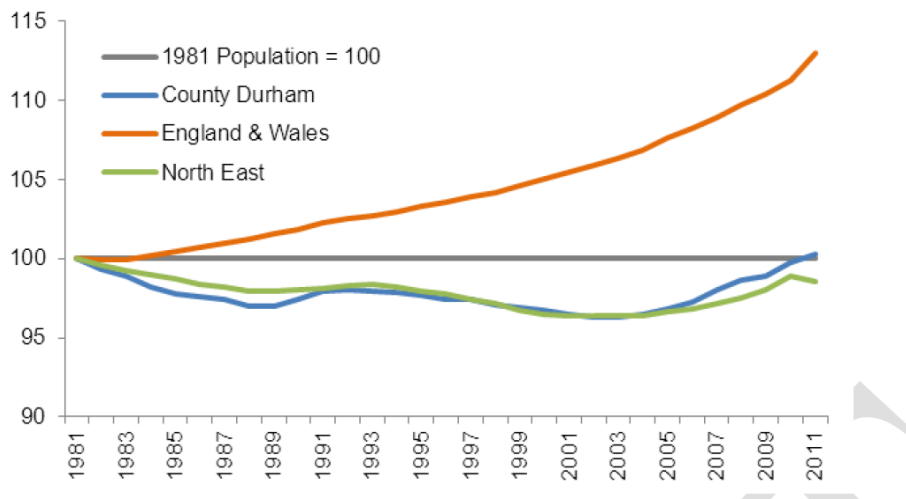
In making its population estimates the County Council depends entirely on all 3 parameters staying positive and maybe increasing in order to create the population of the County needed even for the extra housing already being planned. No evidence whatever has been offered for this essential constraint.

In addition, at no time is a routine standard error given in their population estimates to define the confidence level in their data. This is basic to all decision making, especially when radical decisions are being made, because no numbers are absolute and a statement of confidence levels is essential.

Furthermore, unless there is a robust source of data for the accompanying time-series of input data used in the resolution of equation (1) then it is essential that the null hypothesis be adopted and conclusions based upon this equation be treated as unfit for purpose.

Indeed it looks very much as if the population prediction based on POPGROUP rests on the desired housing market rather than the other way round. The population figures cannot, and must not, be manipulated in order to pander to the powerful building lobby. It is of interest that in 2008, as mentioned above, the 'Regional Spatial Strategy' (the RSS) used by the previous Labour government made very modest predictions for the population growth and housing needs of County Durham. Perhaps in the face of pressure from the building lobby this evaluation has recently been scrapped by the present government even though the numbers used by the ONS have still not changed.

Figure 1: Population change 1981 to 2011 (change from 1981 base)



Population of County Durham, 2011 census = 513,000. The County Council's predicted population in 2030 = 560,700, an increase of 47,700, needing 22,500 extra houses estimated at 2.2 bodies per house. However, the workforce (18-65 population) in 2011 = 301,900 predicted in 2030 in the same analysis to be 296,800, essentially zero growth. In 2011 the retired population = 110,950 predicted to rise to 157,200 by 2030, an increase of 46,250. Does the retired population need an extra 22,500 houses? Furthermore, as noted (*pers com*) by Professor John Clarke, University of Durham, who has been closely involved with these estimates, the population of the North East (including County Durham) and Scotland has remained essentially static for the last century and there is no evidence of any significant and prolonged upward movement.

National Population Predictions, ONS, November 2013:

The most recent estimate of population changes over the next 25 years was provided by ONS a year ago. Table 1 provides their mid-range estimate in a predictive science that is almost an art form. The following cautionary comment is made:

“Projections are uncertain and become increasingly so the further they are carried forward in time. In addition to the principal (main or central) projection, variant projections are produced based on alternative, but plausible, assumptions of future fertility, mortality and net migration. These variant projections are intended to provide an indication of uncertainty and sensitivity to alternative assumptions; they do not represent upper or lower limits of future demographic behaviour.”

Table 1: Projected population by age, United Kingdom mid-2012 to mid-2037

Ages	Millions					
	2012	2017	2022	2027	2032	2037
0-14	11.2	11.7	12.2	12.3	12.2	12.2
15-29	12.6	12.4	12.1	12.3	12.9	13.3
30-44	12.8	12.7	13.3	13.6	13.5	13.2
45-59	12.6	13.3	13.0	12.6	12.4	13.0
60-74	9.4	10.1	10.7	11.6	12.3	12.1
75 and over	5.0	5.5	6.6	7.7	8.5	9.5
75-84	3.6	3.8	4.6	5.3	5.4	5.9
85 & over	1.4	1.7	2.0	2.4	3.1	3.6
All ages	63.7	65.8	68.0	70.0	71.7	73.3
Median age (years)	39.7	40.1	40.6	41.3	42.1	42.8
Under 16	12.0	12.4	13.0	13.1	13.0	13.0
Working age*	39.4	41.0	42.4	42.9	43.1	44.2
Pensionable age*	12.3	12.4	12.5	13.9	15.6	16.1
Old age support ratio* (working age/pensionable age)	3.21	3.29	3.39	3.08	2.76	2.74

These data are represented graphically in Figure 2. What both the table and the figure illustrate very clearly is that a significant portion of the anticipated population increase comes from those aged 75 and over, rising from 10% today to 19% in 2037. Indeed if the retirement age is reduced to 60 in the future then this causes an increase from 19.4% today to 31.1% in 2037. By contrast the working population is anticipated to increase from between 1.5% to 4.2% (mean = 2.95%) over the same time period, on average about 250,000 throughout the UK. Those planning future housing requirements should take account of these predicted changes.

Figure 2: Estimated and projected age structure of the United Kingdom population, mid-2012 and mid-2037

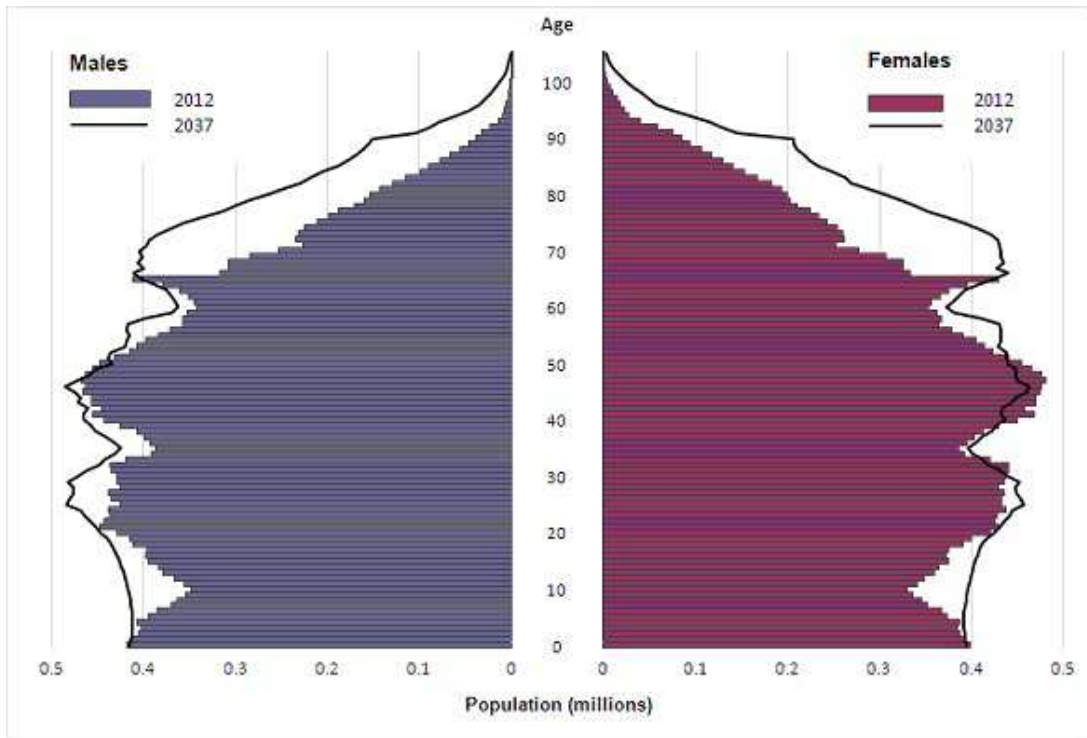
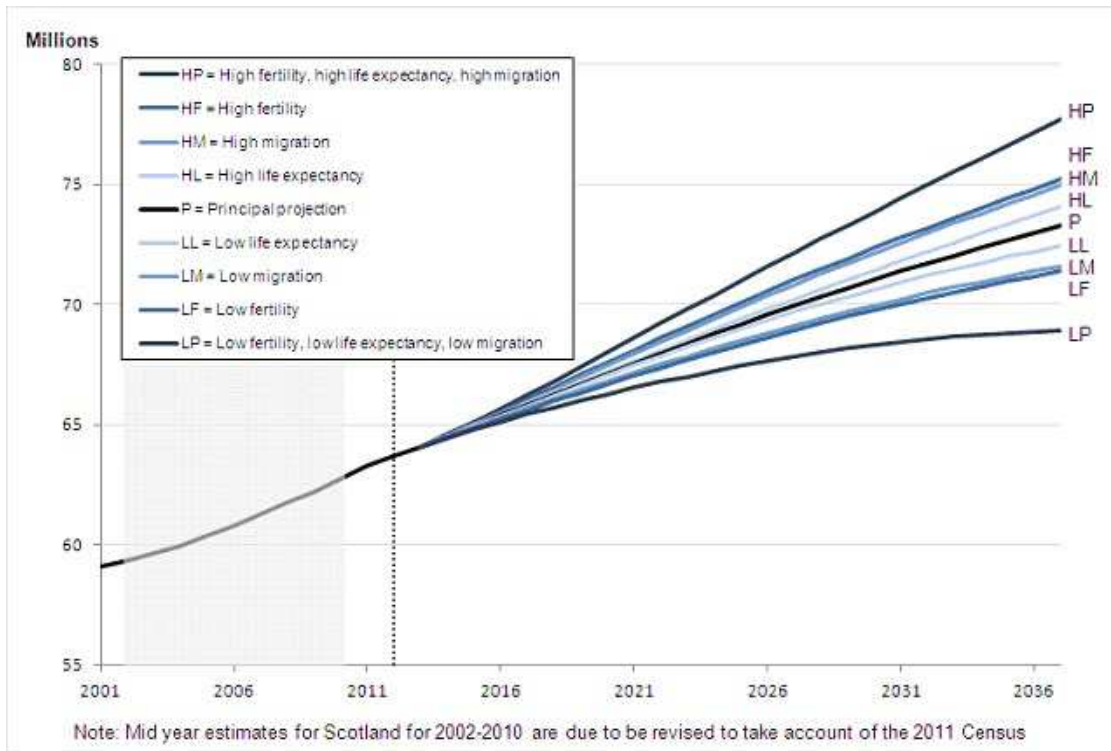


Figure 3: Estimated and projected population of the United Kingdom mid-2001 to mid-2037



Recently (20/8/14) the County Council has submitted a supplementary document re-evaluating their population projections. There are some key observations in this document. In paragraph 6 it admits that the new growth estimates (now 6.9%) are *“lower than that projected in the 2010 based (8.8%), 2008 based (9.5%) or Durham County Council (DCC) 2011 based trend (9.3%).”* In paragraph 8 it adds that the *“latest projection shows a marked projected fall in all categories of net migration”* and that *“the extent of this decline, when viewed in the context of the four year time series is dramatic. In fact the most recent migration projections are very much at variance with those released over the preceding period 2008-2011”*.

These cautionary observations do not deter the County Council officers. They still show in their text figure a rapid and marked increase in the population of County Durham reaching upwards well into the future. There is no algorithm to sustain this model merely the belief, set out in their Table 4, that *“migration is used to balance the relationship between the baseline population and the growth target”* to which they add the circuitous and self sustaining observation that *“a higher level on in-migration will occur if there is insufficient working age population to meet the forecast increase in the size of the labour force”*.

In developing this supplementary document the County Council has still relied on its POPGROUP model (paragraph 13 *et seq*). The arguments provided above have already dealt with the inherent weaknesses in this type of modelling.

The Demand for Housing

Houses do not provide long term employment; rather, houses traditionally follow centres of employment and housing needs should match the development of those centres wherever they are in the county, eg Nissan, Hitachi. That is, to drive up housing needs it is necessary to confirm future patterns of economic growth, their location and the associated employment levels.

Durham City, by its history, construction and geographical constraints, is not a natural source of industry. It is an administrative, academic and ecclesiastical centre whose level of employment relies on the stability of its funding. Because of constraints in public spending this source should not be expected to increase very much in the next decade and there is little room for significant industrial expansion. The proposed commercial developments at Aykley Heads, by their restricted geographical setting, are modest in size and, because of their anticipated high-tech nature will not employ large numbers of people, all of whom could easily be accommodated on the adjacent housing estate that is being planned and at the already approved and progressing Mount Oswald development.

Unfortunately, Durham City is victim to the following statement made by the County Council in its draft proposals:

*“In addition to the trend projections described below, the County Council has commissioned policy-led projections. **These are where aspirations for the population of the county are built into the projections** by adopting a target population by 2030 for one of its key age cohorts, the working age population aged 16 to 64. The output from such models is the size of net migration and natural change required to achieve the adopted target.”*

In summary, with no firm evidence to hand, the County Council has simply created its own answers to justify consuming Green Belt land with unnecessary additional housing. **The model used may be built on an aspiration; but it has no basis in fact.**

MATTER 7

Policy 6 : Durham City / Comment ID: 4323

Policy 8 : Durham City Strategic Sites / Comment ID: 4324

Policy 9 : Western Relief Road / Comment ID: 4325

Policy 10 : Northern Relief Road / Comment ID: 4326

Policies 6, 7, 8, 9 and 10 are interlinked and essentially dedicated to Durham City and its position within the County. The City is apparently seen by the County as its golden goose, without any regard for the negative impact that these policies will produce.

Policy 6 proposes an extra 5,200 houses, but identifies only Aykley Heads as its single strategic employment site, for that is the only area left in the City large enough to sustain additional office space. This will not require 5,200 extra houses introducing an additional population of about 12,000 bodies creating all the problems of sustainability that this introduces, see also Appendix 1 above. Therefore the occupants of such houses will have to travel to wherever work exists, to the east and south of the county or to Newcastle, Sunderland and Middlesbrough. The sites for these proposed houses are not even close to the rail network. To minimise travel, housing should follow places of significant employment or be designed to create community regeneration (County Plan 4.88).

Policy 6 reveals a basic misunderstanding of the nature and environmental importance of this heritage city. **Policy 6 is unsound.**

Policy 7 looks at the only available employment site left in Durham City, Aykley Heads. It offers a variety of 7 commercial opportunities. Only one (A2) is for financial and professional services. The rest are identified for drinking, snacking, sandwiches, hardly the vital driver for the city, let alone the county. **Policy 7** needs a total re-think and re-write and is **unsound**.

Policy 8 identifies strategic building sites in Durham City, Sniperly Park, north of the Arnison Centre, east of Sherburn Road and, unmentioned, at Merryoaks in Neville's Cross. This is almost all recognised as Green Belt land in the 2004 Local Plan. There is no cause whatever to consume precious Green Belt land outlined in the very well constructed Local Plan whose findings are still relevant today. There is already significant housing planned for Mount Oswald, and other sites in the pipeline, already sufficient for the city's housing needs. The submission provided by the 'Friends of the Durham Green Belt' has identified over 2,000 potential houses begun or anticipated through the planning system. Furthermore, as already discussed, the population calculations used by the Council are without merit, **Appendix 1** above. **Policy 8 is unsound.**

Policies 9 and 10 refer to the proposed Western and Northern Relief Roads. These can only be built using planning gain from the ambitious but unnecessary building plans contained in Policy 8. The route of the Western Bypass is inadequate because it does not bypass the A167 (as proposed in the 1990s) but merely cuts to the A690, potentially useful for those heading to and from Ushaw Moor and Willington but offering nothing for those travelling north/south along the line of the A167. In its present form this by-pass is inadequate and ill-conceived. **Policy 9** is therefore **unsound**.

A similar argument can be made for the Northern By-pass but here primarily on the grounds that it would need a large contribution from planning gain (in the absence of government funding) and that in turn would result in unacceptable environmental damage. Policy 10 is scantily written and lies in the realm of wishful thinking. **Policy 10** is **unsound**.

MATTER 10

Policy 14: The Durham Green Belt / Comment ID:

Policy 14 addresses the key issue of the Green Belt. It is a very thin and inadequate document for such an important subject. The opening rubric is adequate but its consideration of strategic green belt alterations (4.204 and 4.205) is inept because it immediately defers to objective 2 as adequate reason to abandon green belt land in Durham City to the building lobby. This is not a justification because in itself this is not a balanced argument. It also sets aside a very carefully reasoned construction of the Green Belt around Durham City in 2004, after a long examination in public, on the grounds that, with the deliberate removal of Durham District Council in 2009, the *“new unitary authority...was able to have a fresh perspective on the needs of the County..”* (p. 88) and that *“the economic circumstances between then and now are very different..”* The only difference is that, with the removal of the District Council, the welfare of the City is no longer a central concern any more than the environmental damage that might be caused by abandoning the position confirmed some years ago. The County Council’s entire position is one of expediency without regard to consequences simply to serve short term benefit likely to cause long term damage. **Policy 14** is therefore **unsound**.

MATTER 11

Policies 21: Renewable Energy / Comment ID:

Policy 22: Wind Turbines / Comment ID: 700899

Background

With an annual UK energy deficit of £75 billion and rising *“we are increasingly dependent on external suppliers to drive our industries and maintain our economy. Those external suppliers are unreliable and unstable yet control the prices we pay for our energy. Our economy is forfeit to them”*. This energy dependence only dates back to 2005 when our indigenous oil supplies began to diminish and our primary coal supplies had been closed down.

Bridging the energy gap during the next 20 years is essential if this country is to maintain a strong economy. Every community has to identify alternative sources of energy, renewable or otherwise, which, brought together, will allow us to enjoy energy independence. The opportunities are widespread and available but they can only be achieved if local policies embrace government and European thinking.

Stored (fossil) energy – coal, shale (fracking) and nuclear – is still available although the geology of County Durham does not lend itself to fracking. Coal is plentiful and can be extracted in places through open cast working, but deep mining has effectively ceased. However, coal gasification, especially off-shore, offers one opportunity that should be investigated and encouraged. Indeed this technique was invented in Durham over a century ago but has not as yet achieved widespread popularity. Because of nuclear accidents at Three Mile Island and Chernobyl nuclear power is treated with great caution and the public remain unconvinced. Even so we should not shut the door completely on this technology.

Stored energy – geothermal, heat exchange, and waste re-cycle – offers great potential. Parts of Durham are underlain by granite which offers geothermal energy. Heat exchange systems are becoming increasingly widespread but are still badly under used and can provide most buildings, alongside other supplementary sources such as solar panels, with very cheap and reliable energy. The River Wear and certain lakes offer heat exchange opportunities that have not been adequately investigated. In terms of the energy cycle, that is re-cycling of all waste (policy 52), County Durham has an outstanding record that must inform other authorities on what can be achieved.

Solar energy – panels and wind turbines – are gaining recognition. All new buildings should be fitted with solar panels as a planning requirement because each panel generates 1Kw per day and contributes to the energy economy of any building. Wind turbines have their place but political resistance to their widespread introduction is increasing. Fewer but more strategically placed 5Mw turbines may offer some resolution.

Gravitational energy – tidal, wave and hydro – have a more restricted appeal in County Durham. Opportunities to tap this source of energy are limited but the Council, through its energy policies, should seek to encourage research and investment along its rivers and its coastline.

Whatever route is taken all new buildings should aim to be energy self-sufficient and this ambition should be central to future planning protocols. This easily achievable outcome should not be brushed aside

The Policies

Policy 21 ignores the NPPF policy 95 requirement that *“when setting any local requirements for a building’s sustainability (to) do so in a way consistent with the Government’s **zero carbon buildings policy** and adopt nationally (sic proscribed) standards”*. This NPPF policy was established over 3 years ago but never once in its planning recommendations has this policy been introduced even when, unusually,

the developers themselves have been prepared to meet this long term beneficial demand for zero carbon construction.

In its opening rubric “Renewable and Low Carbon Energy” leads with “*renewable energy development in **appropriate locations**...*”, which does not address the NPPF directive policy 95. Using the words ‘*appropriate locations*’ offers far too much leeway and lacks an essential commitment to NPPF policy 95.

Policy 21 should be central to planning matters involving all new buildings, of whatever size or number, but this brief policy statement ignores this vital aspect of energy provision. Above all it should identify renewable energy opportunities whenever buildings are being constructed, be they estates, factories, retail buildings or just individual properties. During their construction many buildings offer an opportunity for the installation of **ground loop/heat exchange systems** that make significant energy savings from the outset. The modest additional building costs are soon recovered and are much lower than retrofitting. Their installation also offers long term value to the properties. The same can be argued for the introduction of **solar panels** with the added benefit at present of the government’s electricity sell back scheme. Even without this scheme the long term benefits are fully worthwhile.

Policy 21 lacks vision. It must be rewritten and significantly extended to meet modern standards by requiring the planning arm to introduce NPPF policy 95 at every level. **Policy 21** is therefore **unsound** and also fails to relate to Policy 22.

Policy 22 addresses an issue that is already contentious and its opening rubric establishes exceptions that can be used, possibly rightly so, to stop the unwarranted construction, without restriction, of wind turbines across County Durham. The problem is that wind turbine energy generation makes up 68% of renewable energy capacity in the county and the installation of more wind turbines, at least onshore, may well be reaching saturation point.

Policy 22 fails to redress this balance and recognise wind turbine energy generation in the wider context of renewable energy sources that should have been discussed in depth in Policy 21.

Section 6A of policy 22, pages 118-119 (although a highly worthy sentiment) is completely irrelevant to wind turbines and should be removed and maybe placed elsewhere under a new policy heading entitled ‘worthy intentions’.

Policy 22 is **unsound**, should be inter-linked with Policy 21 and also needs editing.

MATTER 13

Policy 32: Houses in Multiple Occupation and Student Accommodation

Policy 32 dealing with HMOs is brief, inadequate and misleading. As proof, in a recent report to the County Planning Committee regarding an application to develop a large student hostel on the site of the former County Hospital, a senior planning officer wrote in his report: “***The emerging County Durham Plan does not contain***

any guidance in dealing with purpose-built student accommodation schemes” adding also that the ***“NPPF does not contain specific guidance in this regard”***.

This begs the question why, after over 5 years in existence, the County Council has still not come to grips with a key aspect of planning in Durham City, preferring instead to let the market and the university run roughshod over the welfare of the city’s fabric. Planning by default and treating the well founded 2004 Local Plan, which could and does offer valuable guidance, as *“out of date”* and *“of limited value”* is unacceptable.

The opening rubric to Policy 32 lists 3 requirements for planning permission which have been consistently ignored in Durham City. The policy states that (7.41) *“the Council will consult with Durham University on all proposals for accommodation not proposed by the University.”* But what it does not say is that when the University states categorically that it does not want nor will support some student hostel this advice will be ignored by the County Council officers.

The County Council has consistently taken a *laissez faire* attitude to Durham University, perhaps because (7.39) *“the university is an intrinsic part of the city, bringing a range of jobs...”*. This must not mean that the University calls the tune to which the County Council obediently dances, which has certainly been the case to date. There have to be well defined and detailed planning policies concerning the council’s relationship with the university and the 2004 Local Plan sought to define that relationship far better. The city already has a surfeit of student beds, which will create its own housing problems through redundant and empty properties, and makes a mockery of the final statement *“How will the Policy be monitored”*.

Policy 32 is out of date, on the admission of its own planning officers lacks adequate detail, and must be completely re-written. It is **unsound**.