

Below is a copy of the submission I presented on Thursday October 2nd 2014 at Chester-le-Street to the "County Durham Plan Examination in Public" concerning "Matter 4" and on which

I concluded that all of the policy is unsound.

**COUNTY DURHAM LOCAL PLAN
EXAMINATION IN PUBLIC**

Matter 4:

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

The Durham County Plan 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 authorities for without those details decision taking, especially in the field of planning, becomes arbitrary and unreliable.

The County Plan must therefore serve the needs of Durham County, and do so in a self-sustaining manner with 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.

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. 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 and is not sustainable.

Most of these plans pivot on a population growth assumption (4.12, p.31) calculated using a computer programme called POPGROUP. Using this

computer technology the Council estimated a population increase (paragraph 4.23) from 513,000 to 560,700 by 2030. There is no evidence whatever to sustain this assumption as discussed in **Appendix 1**.

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, as the National Statistics Office notes, will be with a significantly aging population and their welfare should have been built into the Local Plan policies.

Recently (on the 20th August 2014) the County Council submitted a supplementary document re-evaluating their population projections. In paragraph 8 of this document it notes 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 firm evidence to support 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 curious comment 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 and the inherent weaknesses in this type of modelling is contained in the appendix to my submission.

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, or more locally in Chilton and Bowburn.

That is, to drive up housing needs it is necessary to confirm future patterns of economic growth, their location and the associated employment levels.

As I noted at the beginning, 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 there and at the already approved and progressing Mount Oswald development.

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

*“In addition to the (population) trend projections, 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.”*

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

Therefore, because Policy 3 (and, one must add, related policies) is built on insecure data it is **unsound** and must be rewritten using more robust and realistic modelling, identifying potential growth areas (eg Hitachi, Nissan) along with the sustainable housing needed for regeneration in the village and small town communities, especially those inherited from past mining activities. The former Durham District Council achieved this over a decade ago and won national acclaim.