

**Below is a copy of the submission I presented on Wednesday October 8<sup>th</sup> 2014 to the "County Durham Plan Examination in Public" concerning "Matter 7".**

**I concluded that all the policies are unsound.**

**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 essentially dedicated to Durham City and its position within the County. The grandiose schemes embodied in these policies rely on a significant increase in the population of the County, most especially Durham City. Yet last week we sought to establish that these figures could well be in serious error and be very misleading. As I said last week *"The Council may wish to use a population increase of 47,700 by 2030 (with 10,000 more added as their 'aspiration') but it is not entitled to assume this number nor use it to predict housing needs"*.

**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 commercial space.

This will not require 5,200 extra houses with an additional population of about 12,000 bodies. Therefore the occupants of such houses would 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 new houses are not even close to the rail network and they are not sustainable.

To minimise travel, houses should follow places of significant employment or be designed to create community regeneration (County Plan 4.88).

**Policy 6** needs a total re-write and is **unsound**.

**Policy 7** looks at the only significant and available employment site left in Durham City: **Aykley Heads**. The Council advises us that it offers a variety of 7 commercial opportunities. Only two (A2 and B1) are for elite professional services. The rest are identified for drinking, snacking, sandwiches, crèche, gym, hotels, which do not yield high employment figures.

Yet, in their presentation the Council used the number 6,000 full time employees on this site. This is an amazing aspiration. The evidence for it is non-existent and the number is unlikely. For example, Nissan at Sunderland also employs 6,000 people. It is massive with a large, sustaining road network and substantial parking. How would that sit at Aykley Heads?

Aykley Heads is primarily green belt land in a highly sensitive location overlooking the Cathedral, which is a World Heritage site. Any buildings in this locality must not intrude on the Cathedral setting so there are strict height requirements for any buildings (albeit not at County Hall built before the Heritage designation). The land around Aykley Heads was also listed in 2004 as an AGLV and a wild life corridor – for example deer run through it to the delight of the many people who walk in this area.

The present buildings at Aykley Heads accord with the building restrictions, are discrete and provide excellent employment at a fairly high-tech level. But the employment numbers are modest. Until Mount Oswald was sold off for house building and a new university college, high-tech developments, linked to the university, were identified for this site. With its loss that ambition switched to Aykley Heads and was trumpeted as such.

Suddenly, something the size of Nissan is about to descend on Aykley Heads.

Aykley Heads is also the site of Trinity School, the only Special Needs School in County Durham. Its presence and its protection must be taken into account.

**Policy 7** needs a total re-think and a more realistic re-write and is therefore **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 defined as Green Belt land in the 2004 Local Plan. With the population projections so badly flawed there is no cause whatever to consume precious Green Belt land which was identified only 10 years ago in the very well constructed Local Plan whose findings are still relevant today. The NPPF is also specific. It states that "*The Government attaches great importance to Green Belts. The fundamental aim is to prevent urban sprawl.*" It adds that "*Green Belt boundaries should only be altered in exceptional circumstances*" a directive endorsed a few days ago by the Secretary of State. There already is significant housing planned at Mount Oswald, and there are other sites in the pipeline, and together they are sufficient for the city's future housing needs. The circumstances in Durham City therefore are not exceptional.

**Policy 8** is without merit, contrary to the NPPF and to present government thinking, and **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 Policies 6 and 8. If the building plans fall, as they should and must, then the finance for these roads also falls.

And there will be no great loss. The route of the Western Bypass is inadequate because it does not bypass the main A167 (as proposed in the 1990s) but merely cuts rather clumsily from the A691 to the A690, potentially useful for those heading to and from Ushaw Moor and Willington but offering nothing for the main body of traffic travelling north to south along the line of the A167.

It is not a relief road, it is not a by-pass, and as presently proposed it is inadequate and ill-conceived. It is a road from nowhere to nowhere.

**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, in the absence of government funding, a large contribution from planning gain and that in turn would result in unacceptable environmental damage. Furthermore, the route does not independently link the A1(M) with the A167 but, if you look at the map, simply disgorges into an already saturated Newton Hall.

**Policy 10** is scantily written, lies in the realm of wishful thinking, and is **unsound**.