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Planning. Design. Economics.

**County Durham Plan - Inspector's
Interim Findings**

Planning Review for Counsel

Durham County Council

20 April 2015

22696/MS

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Executive Summary

This report has been prepared for Counsel to Durham County Council in the matter of the Inspector's Interim Report into the soundness of the County Durham Plan ("CDP").

In his Interim Findings, the Inspector found that the Plan has met its legal requirements in terms of Duty to Cooperate, but identified a number of areas of 'unsoundness' in respect of the Plan, that collectively raise significant questions about the overall strategy of the Plan. This report – prepared independently by authors who have had no prior involvement in the CDP - provides an assessment of the Inspector's Interim Findings in terms of whether two of the key conclusions of 'unsoundness' appear reasonable in planning terms. The review does not cover issues of conduct, process, or matters of law.

The review focuses on two principal areas of 'unsoundness' identified in the Inspector's summary of his findings: the objective assessment of needs (an issue that cascades to other matters); and the Western and Northern Relief Roads.

The Objective Assessment of Needs

The Inspector concluded that "*The objective assessment of housing needs is too high because the Council's vision for a successful local economy incorporates unrealistic assumptions about jobs growth and associated in-migration*"

Based on the starting assumption that DCC considered and presented 1,651 dpa to represent the full OAN for the HMA, as drawn from the 'Employment rate 73% plus 30,000 jobs' scenario, we conclude that DCC's approach was justified in underpinning a conclusion that Objective Assessment of Need (OAN) was equivalent to 1,651 dwellings per annum. In particular, our review finds that:

- 1 The evidence available to the Inspector within the ambit of this examination and for the Durham HMA could reasonably lead to the conclusion that OAN is 1,651 dwellings per annum. It is a figure that is arrived at following the process and broad approach set out within the PPG and NPPF;
- 2 The Inspector's main concerns appear unrelated to the proper approach to deriving OAN, with primary reasons given that were unrelated to factors of OAN, including on matters of policy beyond the HMA's boundaries, such as the approach to commuting rates, that were not in any case justified; and
- 3 OAN does require an element of professional judgement and the Inspector acknowledges his role was not "*to substitute my judgement for*

that of DCC” but to assess whether these were soundly based. However, it appears there was limited justification beyond the Inspector’s own judgement to dismiss the conclusion of DCC that 1,651 dwellings per annum represented a sound OAN for the Durham HMA.

The judgement as to the objective assessment of needs is significant because the perception that it is “too high” is referred to by the Inspector in questioning the Plan’s proposals in other areas.

The Western and Northern Relief Roads

We can see that the two relief roads are infrastructure proposals of local significance, and warrant significant attention in terms of their soundness. However, our conclusion is that the Inspector’s analysis as reported does not, in combination, justify a conclusion of unsoundness. This is because:

- 1 He did not have any evidence to support his contention that the Council has not demonstrated that the roads are deliverable and viable;
- 2 We conclude that the Inspector’s finding on OAN that overall growth levels were not justified was not correctly made. Thus a rejection of the relief roads on this ground is not valid;
- 3 The policy in the Local Transport Plan does not undermine the case for the roads given the document did include a reference to them. The potential for congestion charging had been fully explored through the TIF process, and the Council was justified in not pursuing it further given the general rejection of such proposals elsewhere;
- 4 The Inspector’s expressed concerns over the Council’s modelling assumptions - on modal shift targets, traffic levels and growth assumptions – do not appear to be supported by the evidence;
- 5 The Inspector’s finding that the proposed developments in Durham City do not justify the roads due to low levels of traffic growth contradict the view of the Council’s advisors, and are based on looking just at 24 hour figures across the whole study area, and not taking account of peak hour and spatial concentrations;
- 6 Concerns that that the roads are not justified in technical or value for money terms does not appear to have taken account of the evidence – unchallenged in substance – that the roads are feasible; and

The Inspector’s conclusions that the environmental and wider impacts are overwhelmingly adverse relies on the personal views of objectors without also considering the evidence submitted by the Council, some of which is not referenced in the Inspector’s report, implying it may not have been adequately considered.

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1.0 Introduction and Terms of Reference

1.1 This report has been prepared for Counsel to Durham County Council (“DCC”, “the Council”) in the matter of the Inspector’s Interim Report into the soundness of the County Durham Plan (“CDP”, “the Plan”) under the Town and County Planning (Local Planning) England) Regulations 2012.

Background

1.2 The CDP is a Development Plan Document (DPD). Work began on the Plan in 2009 and it was formally submitted to the Secretary of State in April 2014. A pre-hearing meeting was held on 31st July 2014, and the Examination hearings were held in October and November 2014. The Inspector’s Interim Findings were published on 18th February 2015.

1.3 In his Interim Findings, the Inspector found that the Plan has met its legal requirements in terms of Duty to Cooperate, but identified a number of areas of ‘unsoundness’ in respect of the Plan, that collectively raise significant questions about the overall strategy of the Plan.

1.4 To inform consideration of the matter, Counsel to DCC requested that an independent and objective review of the planning judgements in the Inspector’s Interim Findings be conducted. This provides the basis for this report.

Terms of Reference

1.5 This report is focused on an assessment of the Inspector’s Interim Findings in terms of whether two of the key conclusions of ‘unsoundness’ appear, prima facie, to be reasonable in planning terms given:

- a the evidence presented in support of the Plan by the Council;
- b the evidence submitted by objectors to the Plan; and
- c The National Planning Policy Framework (“NPPF”, “the Framework”) and Planning Practice Guidance (“PPG”, “Guidance”).

1.6 The review has been conducted on the basis of material directly referred to in the Inspector’s Findings, and other evidence we have identified - not all evidence submitted to the Examination has been reviewed.

1.7 We are aware that the Council had some concerns about matters of process and conduct during the Examination. However, these matters are outside the ambit of this review; nor does this report consider specific matters of law.

1.8 The authors of this report (“the authors”) have not visited any of the development locations in the course of preparing this report, so are not in a position to provide definitive conclusions on the ‘soundness’ of the proposals of the Plan insofar as matters relate to issues of landscape, openness, Green Belt purposes or ‘tranquility’.

- 1.9 A meeting was held between the authors and officers of DCC on 23rd March to provide a briefing, ask questions and seek clarification on specific matters.

Independence and Objectivity

- 1.10 At the recommendation of Counsel, this report has been prepared by Matthew Spry MRTPI of Nathaniel Lichfield & Partners (“NLP”, “the company”) supported by Martin Taylor MRTPI (also of NLP). Both individuals are based in the company’s London office.
- 1.11 From its offices in Newcastle upon Tyne, NLP carried out some evidence base work for DCC, notably its employment land review (“ELR”) that was relied upon as part of the justification for the Plan. NLP is also retained by a number of landowners/developers with interests in Durham, including some that were subject to proposed allocations in the draft Plan. Acting on behalf of a number of representors, NLP attended sessions of the Examination. A number of these NLP clients would stand to benefit were the draft Plan’s proposals (as reflected in the Submission draft Plan) to proceed to adoption broadly as conceived by DCC. DCC are aware of NLP’s existing involvement in the Plan and understood this in the appointment of NLP.
- 1.12 In accepting the engagement to carry out this review, NLP carried out a conflict of interest check in line with its internal procedures (compliant with ISO 9001:2008). The work on this report has been carried out by a team within NLP that had no prior involvement with the CDP. Appropriate ‘Chinese walls’ have been erected: there has been no discussion between the authors preparing this report based in NLP’s London office and those colleagues elsewhere in the company who worked on the CDP. The authors of this report did so in line with their professional obligations as full members of the Royal Town Planning Institute.

Report Structure

- 1.13 This report is structured around two of the principal areas of ‘unsoundness’ that the Inspector summarised in paragraph 4 of his Report, namely:
- a The Objective Assessment of Needs (Section 2.0)
 - b The Western and Northern Relief Roads (Section 3.0)
- 1.14 For each area, the section sets out the Inspector’s findings, relevant national policy and guidance, what the Council has indicated is its view on the Inspector’s Findings, our analysis of the position, and our judgement as to whether the Inspector’s judgement was reasonable in terms of his conclusion on ‘soundness’ as defined by paragraph 182 of the Framework. It is clear that in many respects, the overall Objective Assessment of Need (OAN) is a determinative factor in the subsequent areas, including matters of spatial strategy and Green Belt that were flagged as areas of concern by the Inspector, but which are not addressed within this report.

2.0 The Objective Assessment of Needs

The Inspector's Findings

2.1 The Inspector's findings in respect of objectively assessed needs (OAN) are set out within para 26-43 of his report. Within his summary (para 4), his overarching interim conclusion is that:

"The objective assessment of housing needs is too high because the Council's vision for a successful local economy incorporates unrealistic assumptions about jobs growth and associated in-migration."

2.2 He arrives at this conclusion within the interim report on the core basis of the following (as summarised):

- a That County Durham is the relevant housing market area (HMA), a conclusion arrived at by the Council and seemingly unchallenged with the findings (para 28);
- b That demographic trend based projections, drawn from DCC evidence on Population, Housing and Employment Projections (Doc R5), would result in a decline in jobs of 3,266 by 2030 (para 31) and that:
 - i This outcome *"would not accord with the economic growth aspirations of DCC, the North East Enterprise Partnership (NELEP) or the NPPF"* (para 31); and
 - ii It is appropriate to consider alternative scenarios that aim for economic growth and these should be *"aspirational but realistic"* (para 31).
- c In respect of DCC's preferred economic growth scenario of 'Employment rate 73% plus 30,000 jobs':
 - i this would support jobs growth of 23,000 in County Durham itself with the remaining 7,000 being outside, i.e. resident labour force out-commuting (para 32). The out-commuting element is of concern to the Inspector as other authorities are seeking to reduce the proportion of jobs taken up by in-commuters through their own housing provision. He concludes as such, whilst workforce/jobs growth is broadly in alignment across the wider region, there is insufficient evidence that this extends to housing provision (para 40);
 - ii the chosen 73% employment rate is above the current/recent rates and is a challenging target albeit not beyond the realms of possibility (para 33); and
 - iii the 30,000 jobs target, with 23,000 within County Durham, may accord with economic aspirations and results from econometric forecasts, such as the Experian economic forecasts which support a 'policy neutral' jobs increase of 22,900 over the plan period (para 34). However, the preferred economic scenario builds in assumed

high levels of in-migration which the Inspector considers represents an “*unacceptable risk*” and competition for job growth from other authorities will, in the Inspectors view, have a moderating effect on the Council’s economic ambitions (para 39).

- d The affordable housing needs, identified as 674 affordable dwellings per annum (para 41), and market signals could lead to an upwards adjustment in OAN higher than that suggested by demographic projections. However, given the upward adjustment brought about by the jobs target, any further upward adjustment in respect of these factors would result in an OAN “*that is not grounded in realism in respect of associated population levels*” (para 42).

- 2.3 The above leads the inspector to conclude (para 43) that 1,651 dwellings per annum, drawn from the ‘Employment rate 73% plus 30,000 jobs’ scenario, would not be a reasonable calculation of OAN, indicating that a more realistic view about employment growth and associated levels of in-migration is necessary. Ultimately the inspector concludes (para 43):

“A more cautious jobs growth target, reducing the reliance on in-migration, would be a more realistic and deliverable scenario that would reduce the evident risk that the planned level of housing might well be forthcoming but the anticipated jobs may not. As such the OAN is too high and should be lowered.”

- 2.4 The Inspector goes on to recommend a reduced economic growth scenario equivalent to 1,435 dwelling per annum, drawn from an ‘Employment rate 73%’ scenario within DCC’s evidence base stating this would be “*more realistic*” (para 43).

Relevant National Policy and Guidance

- 2.5 The NPPF sets out that local planning authorities should ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing within the housing market area, as far as is consistent with the policies set out in the NPPF (para 47). This two-step approach set out in paras 14 and 47 of the NPPF, to first identify OAN, and then seek to meet it (unless doing so would significantly and demonstrably outweigh the benefits or specific policies in the Framework indicate development should be restricted), has been confirmed in the High Court and Court of Appeal¹. The first step is therefore to identify full objectively assessed needs and the NPPF sets out the approach to defining such evidence which is required to underpin a local housing requirement. It sets out (paragraph 159) that in evidencing housing needs:

“Local planning authorities should have a clear understanding of housing needs in their area. They should:

¹ ‘(1) Gallagher Homes Limited (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283 (Admin)’ and subsequently ‘Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited [2014] EWCA Civ 1610’ – See para 16

- *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
 - *meets household and population projections, taking account of migration and demographic change;*
 - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
 - *caters for housing demand and the scale of housing supply necessary to meet this demand...*

2.6 Furthermore, the core planning principles set out in the NPPF indicate that a planned level of housing to meet objectively assessed needs must respond positively to wider opportunities for growth and should take account of market signals, including housing affordability (paragraph 17).

2.7 The Planning Practice Guidance (PPG) contains a section providing guidance on housing and economic development needs assessments. The PPG indicates that there is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need (ID 2a-005), but goes on to outline an overarching methodology for preparing need assessments in a transparent manner. The PPG identifies that an objective assessment of need should fulfil the following criteria:

- be proportionate and not consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur (ID 2a-003);
- be based on facts and unbiased evidence. Constraints should not be applied to the overall assessment of need (ID 2a-004);
- utilise household projections published by the Department for Communities and Local Government as the starting point estimate of overall housing need (ID 2a-015);
- consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates (ID 2a-017); and
- take account of employment trends (ID 2a-018), appropriate market signals including market indicators of the balance between the demand for and supply of dwellings (ID 2a-019) and affordable housing needs (ID 2a-029).

2.8 In respect of affordable housing needs the recent high court case of Satnam Millennium Ltd v Warrington Borough Council² clarifies that the correct exercise to incorporating affordable needs into an OAN is (para 43 iv):

“(a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes;

(b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.”

2.9 It is against this relevant national policy and guidance that the OAN for the housing market area should be considered. It is also against this context that we have reviewed the Inspector's findings.

The Council's View

2.10 The Council's response to the Inspector's matters and questions on the 'quantity of development' is set out in document DCC6 supported by DCC23. This sets out the Council's position presented to the Examination. The Council's position on its overall housing requirement figure and how it was arrived at is clearly described. However, although within DCC6 the distinction between full OAN and a 'policy-on' housing 'requirement' is drawn (as per *Gallagher v Solihull*), the Council's position on its concluded OAN figure (as distinct from the 'requirement') could, in our view, have been more clearly expressed...Para 14 of DCC6 appears to set out that the proposed growth strategy is *“a policy on scenario... identified and developed for the Plan”*. DCC23 suggests OAN is 1,435 dwellings per annum (a population trend scenario) and that the 1,651 dpa is a housing requirement reflecting aspirations of the Plan.

2.11 Our view, notwithstanding the position set out above, is that the Inspector's findings are unequivocally written on the basis that 1,651 dwellings per annum is considered to be the (in his view, too high) calculation of OAN presented by the Council's evidence, considered through the examination and also applied as the housing requirement (e.g. see para 43 and 44). This position (that OAN includes an upward adjustment to reflect economic growth) would better accord with the guidance within the PPG - that an uplift above demographic-led projections is necessary for considering full OAN to account for employment growth, market signals and affordable needs - and may support the starting consideration of 1,651 dpa as OAN.

2.12 The Council's primary concerns with the Inspector's findings on OAN can be summarised as follows:

a That DCC at the examination made clear the link between the commuting ratio and the 30,000 labour force supporting 23,000 jobs within County

² Satnam Millennium Limited v Warrington Borough Council [2015] EWHC 370 (Admin)

Durham and 7,000 beyond and that this commuting ratio is the primary evidence justifying that within the OAN calculation the housing/jobs are in balance across the wider region; and

- b That the Inspector, whilst noting the importance of economic growth and appearing to understand 23,000 jobs as a policy neutral approach, then concludes that an appropriate OAN would be one consistent with a lower jobs growth of c.18,600 jobs.

Analysis

- 2.13 The Inspector's conclusion is that 1,651 dwellings per annum, drawn from the 'Employment rate 73% plus 30,000 jobs' scenario cannot be representative of OAN and therefore the housing requirement is not justified. The substantive rationale for this can be boiled down to two key points:
- 1 Firstly, that the planned 30,000 jobs (actually a 30,000 resident labour force in employment ambition from DCC, with 23,000 jobs in County Durham and 7,000 in the wider region through net out-commuting) is not justified in the context of surrounding authorities' aspirations, the effect this has on assumptions around housing/jobs alignment across the wider region, and the likely competition for jobs growth; and
 - 2 Secondly, that it involves net in-migration to the HMA over and above that of the baseline trend scenario presented by DCC, which itself is above the trend from the more recent ONS 2012-based sub-national population projections.
- 2.14 We consider each as follows.

A jobs led starting point and the inter-play with the wider region

- 2.15 The Inspector does not appear to fundamentally question the efficacy of the 30,000 jobs growth across the wider region and indeed notes that the Experian econometric forecasts support the 23,000 jobs growth within Durham County as being ambitious but achievable. Therefore, the question is whether the Inspector is justified within the ambit of OAN to conclude 23,000 jobs is an unrealistic view of employment growth for County Durham.
- 2.16 In respect of the derivation of the 30,000 labour force growth target and 23,000 jobs growth, this appears to have originated in a strategy-led approach, based upon aims and objectives for the County. Initially identified as one of several scenarios tested in 2012 within 'Defining economic growth in the County Durham Plan' (Doc Ref R7) as a job growth scenario of 25,000-30,000 this was brought forward and refined through updated modelling within the 'Population, Housing and Employment Projections Paper' (2013, Ref R5). This was the basis for the aligned housing and economic growth put forward in the Pre-Submission Draft of the Plan (2013, Ref K6). It was only subsequent to this that substantive evidence to support the 23,000 jobs/30,000 labour force was produced, with the 'Defining economic growth in the County Durham Plan' report (R5) stating in 2012 that whilst the Council wished to include estimates

of local economic growth that *“this would not be helpful within the current economic climate as there is great uncertainty”* instead preferring to keep the issue under regular review.

- 2.17 In March 2014 the ‘Strategic Economic Plan for the North East’ (Ref V3) was produced providing a strategic basis for ambitious job growth within the region, whilst the Council produced an update to the Employment Land Review, ‘Defining Economic Growth’ in February 2014 (ref. R4). Crucially the latter document establishes an Experian econometric forecast of 22,900 over the plan period as being a ‘policy neutral’ estimate of potential job growth. Experian is an independent forecasting agency, and produces its forecasts entirely separate to plan-making processes.
- 2.18 Whilst it is clear that the jobs growth underpinning the Council’s conclusion on OAN originated in a policy-applied fashion (i.e. to deliver economic growth and address labour market problems), it is a position subsequently supported by independent evidence. This is important, as in disregarding the Council’s position on job growth and OAN, the Inspector appears to, at least in-part, regard the 23,000 jobs to be created in County Durham as unrealistic. It is, however, supported by at least one piece of unchallenged evidence as being a reasonable and objective assessment of potential economic growth. The PPG (ID 2a-018) specifically sets out that *“Plan makers should make an assessment of the likely change in job numbers based on... economic forecasts as appropriate.”* That is precisely what DCC did, albeit later in the process, in light of the findings of economic uncertainty in DR5. The Inspector acknowledges that this evidence exists (para 34), but does not appear to provide any substantive reason as to why it does not represent a soundly based assessment of potential job growth. As such, based upon the evidence, there appears to be little substance to conclude that DCC were not justified in using a 23,000 job growth figure as a starting assumption for a realistic assessment of likely job change and an integral part of assessing their OAN for housing (as well as employment).
- 2.19 The Inspector indicates that one of his primary concerns with the 23,000 jobs growth in County Durham and associated 7,000 jobs created within the wider regional area, is the degree of alignment across the wider region for both jobs and housing.
- 2.20 Firstly, the Inspector considers it *“imperative”* to take account of the fact other authorities in the North East will similarly be seeking growth and such competition will have a moderating effect on the Council’s economic ambitions (para 39). However, from our review of the evidence, there are some key in-built principles and assumptions which might not support that proposition for considering OAN in a policy vacuum. The evidence defines Durham as a single HMA, with the NPPF requiring OAN to be assessed at the HMA level. It is reasonable to consider the baseline jobs growth (such as that drawn from an econometric forecast) for that HMA level when deriving OAN. Such econometric forecasts are produced using nationally consistent assumptions and as such already reflect the growth potential of Durham versus other areas.

If other areas are seeking to deliver more growth than their baseline share of any given econometric forecast, then they would be seeking to do that through application of policy. It is justified that DCC would not take account of such factors within the OAN.

- 2.21 Secondly, and flowing from a similar point, the Inspector indicates (para 40) that as some surrounding authorities are seeking to reduce their in-commuting through making housing provision, there is insufficient evidence that there will not be cumulative housing over-provision across the region (whereby within the 7,000 jobs taken by out-commuters from Durham, both Durham and the neighbouring authorities end up make housing provision for them). Whilst there is some logic to this, and the Inspector concludes that the concern is limited to the soundness of the plan rather than the duty-to-cooperate, this is a factor that is firmly within the realms of strategy-making, rather than specifically considering the OAN for the geographic extent of the HMA.
- 2.22 Insofar as they are seeking to enact shifts in commuting patterns, neighbouring HMAs are doing so as a matter of strategy. Moreover, although reference was made by one objector to Newcastle-Gateshead and to Middlesbrough which had objectives to change migration/commuting assumptions, no evidence was put to the examination that quantified or justified a specific change to the existing commuting patterns for Durham which are set out within the DCC evidence base (see para 4.11 of R5 and 11.4 of R6, both of which indicate use of a net commuting rate in Durham that does not change over the projection period based upon Census data). Our analysis suggests that Inspectors examining the plans for Newcastle-Gateshead⁵ and Middlesbrough⁶ did not identify implications for Durham in their considerations..
- 2.23 In respect of considering OAN, the cautious approach adopted by DCC of using commuting assumptions drawn from the Census and not seeking to adjust them without due evidence, would accord with the advice on OAN produced by the Planning Advisory Service.⁷ The approach to commuting rates taken within DCC's OAN evidence does not appear to be unjustified.

Net In-Migration

- 2.24 The inspector concludes that the high level of in-migration that is built into the preferred economic scenario is an 'unacceptable risk' (para 39) a conclusion which appears to be predicated on the basis the inward migration under the

⁵ The Newcastle-Gateshead Inspector's Report refers to the shift in commuters specifically in relation to Newcastle (north of the River Tyne), rather than Gateshead (contiguous with County Durham). Paragraph 23 of his report states: "With the agreement of North Tyneside Council, the CSUCP aims to reduce this outflow (and the associated in-commuting) by providing additional housing closer to existing and potential employment opportunities in the urban core, thereby reducing travel."

⁶ There is no reference in the Inspector's report for Middlesbrough's Housing Local Plan (October 2014) to it relying on a change in commuting/migration patterns with Durham. The Middlesbrough Housing Local Plan Inspector's report focuses upon change within Tees Valley itself, noting (para 16) that: "Middlesbrough has experienced high levels of outmigration to adjoining local authorities where higher levels of new build housing have occurred and where there is a wider choice of housing available. 77% of net internal outmigration from Middlesbrough was to elsewhere in Tees Valley of which nearly 60% was to Stockton"

⁷ Planning Advisory Service, 'Objectively Assessed Need and Housing Targets - Technical advice note' (June 2014) – see paras 6.6-6.9.

preferred scenario is greater than the migration under demographic “trend” scenarios (para 37). The NPPF and PPG do not, however, require concluded OAN to perfectly sum to the number of households in a given demographic projection. If they did, there would be no need to consider uplift over and above the ‘starting point’ projections in response to market signals or affordable housing needs, which may lead to more houses being provided than pure demographic trends suggest are needed. The judgement is therefore whether the departure from trend is so substantial as to represent an unrealistic scenario which could not reasonably be expected to occur.

- 2.25 As considered before, it would appear that 23,000 job growth within the County represents a reasonable ‘policy neutral’ basis for job growth and, therefore, it is clear that at least some degree of additional in-migration could be attracted to fill these jobs, were new homes to be provided. That is the basis upon which DCC’s demographic modelling operates. DCC’s demographic “Trend” based forecast projects a rise in population of 47,700 people whilst the preferred scenario projects a rise in population of 57,500 people; a difference of c.10,000 people representing an uplift of 20.5% against trend and a difference of just 1.9% of total population (513,000) at the start of Plan period (see Inspector’s interim findings paras 31-32). Since 2003/4 Durham County had achieved that level of in-migration in one year (2006/7) suggesting it is not implausible. Given the acknowledgement by the Inspector of the “*highly volatile*” nature of different population projections (para 37) it does not appear that it would be beyond the Council’s reasonable judgement to assume this could be expected to occur.

Other Factors

- 2.26 The Inspector does consider the necessity of uplift to deliver affordable housing and market signals, concluding that it is already implicit within the upward adjustment for jobs. Whilst this to an extent is logical and it would not require a double upwards adjustment, in concluding that 1,651 dwellings per annum is not a reasonable calculation of OAN, instead preferring 1,436 dpa, the Inspector does not appear to explicitly set out or explore the extent to which this would meet the full OAN for affordable housing. Within the context of the *Satnam Millennium vs Warrington* judgement this is a key step that must be integrated into the assessment of need. Having reviewed the Council’s evidence, it is not immediately clear where the amount of affordable housing the plan will actually deliver is set out and the extent to which this would meet 674 affordable dwellings per annum need. Whilst this is an omission of the Council’s evidence base (perhaps reflecting that more precise guidance in the PPG on how to address affordable housing need did not emerge until after the pre-submission consultation draft CDP), equally it is one that does not seem to have been adequately considered by the Inspector in concluding on full OAN.

Our Conclusions

- 2.27 Using the starting assumption that DCC considered and presented 1,651 dpa to represent the full OAN for the HMA, as drawn from the ‘Employment rate 73% plus 30,000 jobs’, it does appear from the evidence and Inspector’s

conclusions that DCC's approach was justified in underpinning a conclusion that OAN was equivalent to 1,651 dwellings per annum. In particular:

- The evidence available to the Inspector within the ambit of this examination and for the Durham HMA could reasonably lead to the conclusion that OAN is 1,651 dwellings per annum. It is a figure that is arrived at following the process and broad approach set out within the PPG and NPPF;
- The Inspector's main concerns appear largely unrelated to the proper approach to deriving OAN, with primary reasons given unrelated to factors of OAN but ones of policy and strategy making, including on matters beyond the HMA's boundaries, such as the approach to commuting rates; and
- OAN does require an element of professional judgement and the Inspector acknowledges his role was not "*to substitute my judgement for that of DCC*" but to assess whether these were soundly based. However, it appears there was limited justification beyond the Inspector's own judgement to dismiss the conclusion of DCC that 1,651 dwellings per annum represented a sound OAN for the Durham HMA.

2.28

The above is not to conclude that other factors within the strategy making process or the application of the NPPF might not lead to a different housing requirement figure from that selected by the Council. However, that is a second-step within the process and is not an area the Inspector appears to have explored beyond his conclusions of OAN.

3.0

The Western and Northern Relief Roads

The Inspector's Findings

3.1

The Inspector's findings address the proposals for the Western Relief Road (WRR) and Northern Relief Road (NRR) at paragraphs 94 – 101. He concludes that neither road is justified, deliverable or consistent with the DCC's transport strategies, nor deliverable, environmentally acceptable and viable. He bases these conclusions on the following factors:

- a That they are dependent on the overall growth strategy assumptions and proposed housing requirement; and that whilst the Council's evidence shows the WRR is shown to be required by the modelling, he cannot agree that the Council's forecasts should form part of the analysis because they justify the proposals and are built into the modelling (para 95);
- b The proposal is not in conformity with the 2011 Local Transport Plan (LTP3) (Ref T2) because the latter does not address the roads directly (it defers to the Local Plan) and Policy 5 of the LTP3 refers to proposals for improvements to the highway network only being brought forward in the absence of suitable alternatives, capable of achieving the same objectives. The Inspector refers to the 2008 Transport Innovation Fund (TIF) study (Ref T30) as showing that traffic restraint and public transport benefits would show net economic benefits greater than those with highway building options. He concludes the Council should have included traffic restraint policies in its analysis (para 96);
- c That an objector (City of Durham Trust) has provided evidence about shortcomings in the strategic modelling undertaken by the Council, notably:
 - the 7-10% car trip reduction target, compared to the DfT 'Smarter Choices' programme implied reduction in peak hour traffic of 21%;
 - The modelling suggestion of worsening traffic congestion not matching DfT statistics, for example i) on the A167 through Crossgate and A690 over Milburngate Bridge, and ii) and average speeds/journey times at the morning peak being better in Durham than the North East or England averages
 - That the correlation in DfT's forecasting guidance between growth in GDP and traffic means forecasting traffic growth is problematic (para 98)
- d That the traffic generation associated with the development sites do not justify the provision of the relief roads. An objector showed that the roads have the effect of increasing volume of highway trips in the network by 2030. The Inspector cites the Jacobs evidence base that technical considerations and value for money appraisals of the roads have not been completed and are required before committing to fund and build either road (para 99);

- e That there are environmental and other wider impacts on the City and its setting that are “*overwhelmingly adverse*”, including diversion of traffic from the A1 to local roads, and impact at Bear Park, on the Green Belt and setting of the City and World Heritage Site. DCC’s evidence on mitigation are acknowledged but their reference to damage on ‘tranquillity’ is noted;
- f Overall, that both proposals are not justified, deliverable, or environmentally acceptable, and incompatible with advice on promoting sustainable transport and move to a low carbon future. That the CDP should instead protect and exploit opportunities for use of sustainable transport, walking and cycling. No lower growth alternative has been tested on a settlement pattern which favours the use of sustainable modest of travel;

Relevant National Policy and Guidance

- 3.2 The second test of ‘soundness’ under paragraph 182 of the Framework is for the plan to be ‘justified’, namely that “*the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.*”
- 3.3 Paragraph 152 of the Framework refers to Plan making and states that:
“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.”
- 3.4 The PPG (ID: 11-017-20140306) explains, in respect of sustainability appraisal, how plan-makers should develop and refine options and assess effects:
Plan-makers should assess the policies in a draft Local Plan, and the reasonable alternatives, to identify the likely significant effects of the available options. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in each Local Plan document.
Reasonable alternatives should be identified and considered at an early stage in the plan making process, as the assessment of these should inform the local planning authority in choosing its preferred approach (when developing alternatives, paragraph 152 of the National Planning Policy Framework should be referred to).
- 3.5 The Framework sets out its policies on promoting sustainable transport in paragraphs 29-41, with other references in policy addressing issues such as planning for infrastructure in local plans. Insofar as it relates to the considerations of the Inspector on the relief roads, the key NPPF provisions are summarised below.

- Facilitating sustainable development, contributing to wider sustainability and health objectives; smarter use of technologies to reduce the need to travel; the transport system needs to be balanced in favour of sustainable transport modes, giving people real choice about how they travel, but recognising that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary (para 29);
- Encouragement should be given to solutions that support reductions in greenhouse gases and congestion. Local Plans should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport (para 31);
- Plans should take account of whether: a) opportunities for sustainable transport modes have been taken up, depending on nature and location of the site, to reduce the need for major transport infrastructure; and b) improvements can be undertaken within the transport network that cost-effectively limit the significant impacts of development, but that development should only be prevented on transport grounds where the residual cumulative impacts are severe (para 32);
- Plans should ensure developments that generate significant movements should be located where the need to travel will be minimised and use of sustainable transport is maximised (para 34) and plans should protect and exploit opportunities for use of sustainable transport modes, being located where practical to, inter alia, accommodate the efficient delivery of goods and supplies (para 35); and
- Plans should aim for a balance of land uses so people can be encouraged to minimise journey lengths (page 37) and for larger scale residential developments, planning policies should promote a mix of uses to undertake day-to-day activities including work on site (paras 38).

The Council's View

- 3.6 The Council's position in its evidence base for the plan is that both Relief Roads perform an important role in alleviating congestion in the City of Durham alongside a range of other measures. The Council produced a comprehensive evidence base across a range of technical areas, including transport modelling for the option appraisal, as well as studies assessing the impacts of the schemes.
- 3.7 The Council's concerns in respect of the Inspector's findings are focused on whether the Inspector applied a reasonable approach in interpreting the LTP3, his espousal of traffic restraint measures as a potential reasonable alternative, the application of some data sources and references, and questions as to whether he took appropriate account of the evidence base on impacts and feasibility that the Council had used to justify its proposals for the two relief roads.

Analysis

- 3.8 The Inspector's challenge to the Council's proposals revolves around:
- 1 That the Council has not demonstrated that the roads are deliverable and viable;
 - 2 That the forecasts of growth justifying the requirement for the roads in the modelling cannot be supported;
 - 3 That the roads are not consistent with the LTP and contradict the previous emphasis on traffic restraint;
 - 4 Concerns over modelling assumptions, notably in terms of modal shift targets, traffic levels and growth assumptions;
 - 5 That, in any case, the proposed developments in Durham City do not justify the roads;
 - 6 That the roads are not justified in technical or value for money terms; and
 - 7 That the environmental and wider impacts are overwhelmingly adverse.

3.9 Each of these is considered in turn below.

That the Council has not demonstrated that the roads are deliverable and viable

3.10 The Inspector does not appear to refer to any specific evidence or factors that lead him to the conclusion in paragraph 95 that the roads are neither deliverable nor viable. As we discuss below in respect of the issue of value for money and technical concerns, the Council presented evidence on both counts, and whilst the Inspector makes a general comment that "*I have taken all this evidence into account*" he does not specifically deal with any aspects of unsoundness in the submitted evidence base.

Reliance in the modelling on the forecasts of growth that cannot be supported

3.11 The Inspector correctly links the provision of the roads with the case for development at Durham City. Elsewhere in his findings, he rejects the OAN evidence and the case for focusing growth in Durham City. It stands that if this level and form of growth were not taken forward in the CDP, there would be no immediate case for the roads. We have addressed the Inspector's conclusions on the matter of growth needs in Section 2.0 of our report.

Not consistent with the LTP and contradicts the previous emphasis on traffic restraint

3.12 The LTP is dated 2011 and was framed at a time when the CDP was at its emerging stage. The Inspector refers to the LTP not directly addressing the question of the relief roads. What the LTP states is:

“1.3.1 The LTP3 Consultation Draft issued in October 2010 included an outline of the background and route corridors for a possible Northern and a Western Relief Road. This was included to provide the public with a fullest possible information available at the time of consultation, as the two possible solutions to address impacts on the existing network from more housing in Durham City were already included within the County Durham Plan consultation documentation.

1.3.2 In the interests of brevity the information has been omitted from this Appendices document as it is available elsewhere on the DCC website”

3.13 In this regard, the LTP3 is clearly directing readers to the CDP in part to reduce repetition and also because it is the CDP that most directly addresses the basis for the introduction of the proposals. It is of note that it refers to the October 2010 LTP3 Consultation document that had included outline of the proposals, so the relief roads have not been absent from the preparation of the LTP process. In this regard, the content of Policy 5 in the LTP (which states *“proposals for improvements to the highway network will only be brought forward in the absence of suitable alternatives, capable of achieving the same objectives”*) would have been included in LTP3 by the Council in the knowledge that this would sit alongside proposals for the Relief Roads that would be justified through the CDP process. Moreover, insofar as there would be any contradiction with Policy 5, there is no general requirement for the CDP to be in conformity with policies of the LTP.

3.14 The Inspector refers to the TIF work in 2008, which had advocated traffic restraint measures, including congestion charges, and shown higher net economic benefits than highway building options. The Inspector commented that traffic restraint policies were not pursued by the previous authority but stated this did not justify exclusion of those policies from its analysis. We note that the main text of the Plan (paragraph 4.131) does refer to the advantages and disadvantages of congestion charging.

3.15 In our view, the Inspector’s analysis is problematic. Whilst one might argue that the Council expend efforts to explore the feasibility of congestion charging and similar measures, it was entitled not to view this as a reasonable alternative. This is because there has been limited appetite for congestion charging outside London, and it has been rejected in a number of locations. The analysis of net economic benefits is based on a traditional transport economic appraisal (in essence, attaching a monetary value to typical transport metrics, notably time savings) and is not a broad measure of the overall economic benefits of different options. In addition, the TIF study itself (at page 45) identified a number of challenges for Durham, that would be relevant in concluding congestion charging was not a reasonable alternative once a broader view was taken:

- 1 The majority of traffic using the city centre (around two-thirds) is through traffic, for which alternative routes avoiding the centre either not realistically available or are less direct;
- 2 The majority of this through traffic comes from outside Durham City;

- 3 Durham's traffic is dominated by discretionary trips – shopping, leisure etc – which are more susceptible to competition from other destinations;
- 4 Public transport has a low mode share within Durham – non-motorised modes are more significant, notably walk trips by students;
- 5 Traffic peaks are focused on the morning and evening peak periods although traffic builds up through the afternoon;
- 6 The main east-west route through the city is heavily congested throughout the day, particularly at Millburngate Bridge and along Gilesgate bank to the east;
- 7 Key city centre junctions experience significant delays, as do junctions on the north-south A167; and
- 8 Congestion occurs on most cross-city routes particularly in the morning and evening peak periods.

3.16 The LTP3 document specifically identifies that congestion charging was considered by the TIF process stating that "*Congestion charging has been considered in the past ... and which in the long-term may have to be revisited*". Congestion charging is on the long list of the LTP3 document (para 8.4.20) because it was raised in consultation, but does not make it through to the short list.

3.17 In the context of all of the above, we do not consider it unreasonable for the CDP to have not treated congestion charging and similar traffic congestion measures as a genuine alternative to the Relief Road proposals.

Concerns over modelling assumptions, notably in terms of modal shift targets, traffic levels and growth assumptions

3.18 The Inspector's challenge to the modelling evidence base relates to a series of concerns.

- 1 Modal Shift – the Council's evidence had assumed a 7-10% modal shift (which we understand was used by Jacobs and AECOM based on DfT research on the impact of 'Smarter Choices' measures) consistent with WebTAG guidance. The Inspector cited a 2004 DfT study which referred to 21%. However, we have concerns that:
 - the Inspector does not explain why the 7-10% figure was not justifiable for Durham in the context of the evidence submitted; and
 - He does not quote the caveat to the conclusions of the 2004 DfT research (pages 362-364) which identified the 21% figure. This stated, inter alia "*it would be unrealistic to assume that all authorities could achieve the same effects as those particularly impressive individual achievements that have only occurred in a small minority of cases.*"
- 2 Traffic levels – the Inspector cited DfT traffic count statistics on two routes which showed a reduction in traffic volumes from 2000 to 2013, whereas the Council's evidence base studies (as well as the TIF work

from 2008) had suggested congestion on key routes. We have not viewed the specific data, but would observe that a reduction does not imply no congestion, but more significantly, the Council advised us that the same DfT traffic count data showed five other roads in the City showing an increase in the traffic volumes. More generally, the weight of the Council's traffic evidence does state that congestion exists and is significant, and in our view snapshot traffic count data on two roads is not sufficient to demonstrate that this evidence was unsound. The Inspector also refers to an average traffic speed of 32.8mph (compared to England average of 24.4mph) implying no congestion, but we understand this figure is a County-wide average (in a largely rural area) so not relevant to the position in Durham City specifically.

- 3 Traffic Growth – the Inspector cites problems with robustly forecasting traffic growth and questions the DfT forecasting guidance that correlates GDP and traffic growth. Whilst any forecasting exercise is obviously challenging, in our view the Inspector has not adequately explained why reliance upon DfT guidance on forecasting future traffic growth is not justified. No references or evidence is cited, and no guidance is given as to what alternative assumptions the Inspector would consider appropriate. This criticism of the Council's approach is not a fair one.

3.19 Overall, we do not see in the Inspector's findings a fair and reasonable critique of the specific modelling work carried out by the Council and its advisors and it would thus not be appropriate to draw a conclusion of unsoundness on this point.

That, in any case, the proposed developments in Durham City do not justify the roads

3.20 The Inspector's findings suggest (para 99) that from the model outputs "*it is clear, in either absolute or percentage terms, the development sites do not seem to give rise to a significant increase in total traffic volumes in the study area*" and thus the developments do not justify the roads. The Inspector's findings cite an objector's conclusions that the new roads have the effect of directly increasing the volume of highway trips in 2030.

3.21 The first point (the significance of the increase) is a matter of judgement. However, the cited tables show:

- An increase in 7,011 highways trips (out of 15,580 total increase) between the reference case and the CDP scenario (Table 20 and 24 in Ref T28) in the 2012 work
- An increase in total person trips of 22,246 between the reference case and CDP scenario (Table 10 and para 6.3.1 in Ref T27)

3.22 The evidence document (page 41 of Ref T28) clearly identifies that the context for these (24 hour, Durham-wide) figures is important: spatially the percentage changes will be much higher in Durham City, and the concentration of extra demand in the peak hour, on already congested routes. It is a matter of

judgement, but in our view, simply quoting the figures is not sufficient basis to conclude that the judgements of the evidence are unsound. It is also relevant that the 2030 reference case already assumes some population and housing and thus an increase in traffic flows beyond the current position, but without the ability to introduce mitigation via the relief roads.

- 3.23 On the second point (the impact of the roads themselves) the evidence (Ref T28) does show an increase in travel demand, as the Inspector notes, but the report also highlights that home-based journey lengths by car are slightly reduced. Whether this justifies a conclusion of unsoundness in of itself is questionable, in our view, when compared with the conclusions of the evidence base overall, which is that the relief roads have a positive impact on congestion.

That the roads are not justified in technical or value for money terms

- 3.24 The Inspector quotes the limitation of scope in the Jacobs work T26, that its report has not considered technical or value for money issues and that both will be needed before committing to fund or build either relief road. This is the only reference we can find from the Inspector Findings to justify his earlier conclusion (in paragraph 95) that neither road is deliverable or viable.
- 3.25 The scope of the Jacobs work does not include technical implementation matters. However, this should not be in any way relevant to the Inspector's consideration, as the evidence dealing with technical feasibility was covered by the two AECOM studies (Ref T23 and T24) and has not been referenced directly (apart from as a group of 10 references in footnote 93) or challenged in the Inspector's report.
- 3.26 In respect of value for money assessments, it is our view that this is not a typical consideration at this stage of a local plan. The JLL work (Ref R15) on the Housing and Infrastructure Delivery Study shows the financial modelling of a revolving fund that, it concludes, would be able to fund the delivery of both relief roads. We have not seen this analysis challenged. In this respect, there is no basis – given the reasoning set out – for the Inspector to have concluded that either road was not justified in these respects.

That the environmental and wider impacts are overwhelmingly adverse

- 3.27 We have not carried out site visits of the alignment of each Relief Road, so our ability to express our own view on the potential environmental and wider impacts is limited. In general terms, the Inspector's comments refer to "*coherent and persuasive evidence*" from a number of objectors. On the face of it, we can see that the roads are significant elements of infrastructure in Green Belt settings, so it is right that an Inspector should give this matter significant attention.

3.28 We have not carried out a forensic review of the objectors' evidence, but we note that it does not contain technical studies and relies upon the personal opinion of those objecting. Whilst these views are clearly material, we consider that if the Inspector is giving weight to the arguments in the objectors' evidence, he should do so with reference to why the Council's evidence base – which is what the Council has used to justify its Plan – is inadequate. In this regard, the Inspector only refers to the Council's document Ref T10 on historic assets (quoting from it in relation to impact on 'tranquillity') and T21 on air, noise and water, but does not challenge either report's findings) and states that these "*seek to mitigate the effects*" of the proposals, even though they are assessments of environmental impact. Significantly, he does not refer to the following documents that the Council submitted:

- T15 Northern Relief Road - Landscape and Visual Impact Appraisal Report 2013
- T16 Western Relief Road - Landscape and Visual Impact Appraisal Report 2013
- T17 Northern Relief Road - Ecological Assessment 2011
- T18 Northern Relief Road - Ecological Assessment 2011 (Summary)
- T19 Western Relief Road - Ecological Assessment 2011
- T20 Western Relief Road - Ecological Assessment 2011 (Summary)

3.29 We are not in a position to draw our own conclusions on the environmental impact of the proposals having not visited the sites through which the roads would run. However, we consider that the Inspector's conclusions that the relief road proposals are unsound is not supported by an analysis of the Council's relevant evidence that demonstrates that the Council's more favourable view is incorrect, due to flaws in its evidence base.

Our Conclusions

3.30 We can see that the two relief roads are infrastructure proposals of significance to the Local Plan, and warrant significant attention in terms of their soundness. However, our conclusion is that the Inspector's analysis as reported does not, in combination, justify a conclusion of unsoundness. This is because:

- 1 He did not have any evidence to support his contention that the Council has not demonstrated that the roads are deliverable and viable – evidence on both aspects was submitted and its findings not specifically challenged by the Inspector;
- 2 We concluded in section 2.0 that the Inspector's finding that overall growth levels were not justified was not correctly made. Thus a rejection of the relief roads on this ground is not valid;
- 3 The LTP3 and previous work under the TIF programme was cited by the Inspector as running counter to the Relief Roads, and he concluded more should have been done to look at congestion charging and other traffic restraint measures. However, we find this is not a reasonable conclusion:

the LTP3 did include the relief roads within it, so must be considered part of that package, and the rejection by the public of congestion charging in Manchester and Edinburgh is sufficient basis to reject it as an alternative;

- 4 Expressed concerns over the Council's modelling assumptions - on modal shift targets, traffic levels and growth assumptions – do not appear to be supported by the evidence;
- 5 The Inspector's finding that the proposed developments in Durham City do not justify the roads due to low levels of traffic growth contradict the view of the Council's advisors, and are based on looking just at 24 hour figures across the whole study area, and not taking account of peak hour and spatial concentrations;
- 6 Concerns that that the roads are not justified in technical or value for money terms does not appear to have taken account of the evidence – unchallenged in substance – that the roads are feasible; and
- 7 The Inspector's conclusions that the environmental and wider impacts are overwhelmingly adverse relies on the personal views of objectors without also considering the evidence submitted by the Council, some of which is not referenced in the Inspector's report, implying it may not have been adequately considered.



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