

## Question 8

### Policy 6 – Aykley Heads

1. The Trust disagrees with the Council's Policy 6, which seeks to remove part of Aykley Heads from Green Belt protection with the objective of extending the site that would become available from the redevelopment of the existing County Hall and police headquarters to create what it regards as a strategic employment and housing location. The Trust questions the environmental and economic wisdom of these proposals, and does not consider the Council's approach to be consistent with its sustainability objectives or its underlying stewardship responsibilities as unitary planning authority.
2. The wider Aykley Heads area is recognised in current planning documents as a vital component of the so-called 'inner bowl' around Durham City, the higher land acting as a backdrop to the World Heritage Site. Aykley Heads is also an important presence in many a townscape outside the WHS. To give one example, the steep slope of its eastern side is prominent from the bottom of Hallgarth Street, where its skyline helps create the effect of a city open to green spaces beyond. To close off such a space with new building would replace this openness with a sense of urban claustrophobia.
3. We note that the Inspector involved in setting up the current GB boundaries wrote as follows, less than a decade ago:

I am in no doubt as to the physical attractions of the site of the Aykley Heads Business Park, nor that it has some potential for further development. The Environmental Statements produced by W A Fairhurst & Partners offer a clear demonstration as to how a carefully designed low density low rise development could take place on most of the site without harm to the Area of High Landscape Value or to views from or of the World Heritage Site.

The exception to this is the most eastern part – site 4 on the plan in CR40. As the Statement concludes, 'the development of Site 4 will give rise to moderate adverse impacts, due to the appearance of the building on the skyline from the east and south east and set apart from other elements within the area, and due to the length of time needed for screen planting to integrate the building into its surroundings'. Such harm would be unacceptable and I am not convinced that adequate mitigation could be satisfactorily achieved on this part of the site.<sup>1</sup>

4. This view supports the current Green Belt boundaries, which were established by that Public Inquiry and designed especially to protect the eastern area of the site. However, the relative attractiveness of other areas of Aykley Heads for a low rise business park has arguably diminished since the Inspector's report was written, because of changes and new opportunities emerging in the centre of Durham City. As noted subsequently in the

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1 Inspector's report, para 121.

Trust's response to this question, a number of very substantial buildings or large sites already in the city centre are either currently vacant or soon to be vacated or demolished. In these circumstances, to put forward one of the City's most attractive green areas as the site for a business district seems unnecessary and unjustifiable. Such a development would also lead to a further decentralization of the city's economic life, following the University's move of many of its operations to Durham's southern fringe.

5. To replace, as proposed, both County Hall and the Durham Police headquarters at Aykley Heads with new housing and/or a business district would also involve large demolition costs. We also understand that expensive measures might be needed in such circumstances, to prevent asbestos fibres in these early 1960s buildings getting into the atmosphere. Other costs would involve safety measures to block off the mine-shafts in the woods near the DLI museum, as these would become more hazardous if the local resident population increased.
6. There are serious transport issues to address with this site. As detailed below, Aykley Heads is actually relatively inaccessible. The severance caused by the river valley and the railway means that pedestrian and public transport access from parts of the city which are relatively close as the crow flies is in fact very circuitous. More employment on this site will inevitably generate additional car traffic over Milburngate Bridge or along the A167 and the link roads to the existing roundabout, already congested at peak times. Paradoxically, the best public transport access is by train, but in the context of the County Council's "local strategy for local people" that is only really relevant for people from Chester-le-Street. Those from, say, Seaham or Bishop Auckland are unlikely to want to commute to Aykley Heads by train via Darlington. So Aykley Heads does not tick the sustainability box, but it will add to the dispersal of economic activity from the historic core of the City which is also the node of Durham's transport network.
7. There is also a specific conflict within the Council's proposals. The Masterplan for the site appears to designate the area which currently contains the park & ride facilities for Durham railway station as Development Area D, for development with buildings of up to three storeys in height.<sup>2</sup> As noted in the Trust response to Question 49, this site's current use is essential in supporting the role of Durham station as the railhead for most of the county and for adjacent parts of Tyne & Wear. It should therefore be protected in this use rather than compromised by inclusion in a speculative development brief.
8. All in all, the Trust, while supportive of the underlying purpose of the Council's study of employment sites, does not agree that the evidence warrants the singling out of Aykley Heads as "strategic."

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<sup>2</sup> Durham County Council, *Aykley Heads draft supplementary planning document* (2012), p 24

9. Neither does the Trust accept that that the Aykley Heads development site should be extended further into the existing Green Belt. Paragraph 14, footnote 9, of NPPF makes it clear that Green Belt sites are excluded from the presumption in favour of sustainable development, and goes on to advise at para 83 that:

Once established, Green Belt boundaries should only be altered in exceptional circumstances.

10. The Council's evidence base has entirely failed to demonstrate any "exceptional circumstances" applying its proposed extended Aykley Heads development site that would warrant its removal from the established Durham Green Belt. The Council itself proposes the retention of a significant swathe of parkland along the south-eastern side of the site, so even in the Council's own terms it would be totally inconsistent to seek the removal of Green Belt protection from this area – unless of course the Council retains undisclosed ambitions for the subsequent development of this area also. The Trust therefore wishes to remind the Council that its predecessor's attempt in 1988 to establish offices on the south-eastern third of Aykley Heads Estate was withdrawn following the threat of a call-in from Government Office for the North East.

11. In seeking to resurrect yet again previous ambitions for extensive green-field development at Aykley Heads, the *Preferred Options* document suggests in paragraph 4.52 that "Durham does not have a clearly defined Central Business District", and goes on at paragraph 4.93 to argue that development of the Aykley Heads site will address this alleged deficiency. Similar assertions are made in the *Strategic employment sites selection paper* (2012) at paras 2.4 and 2.7.

12. The supplementary planning document, *Aykley Heads, Durham City*, amplifies the Council's position with the following statement at paragraph 1.8

The Policy Directions Paper (May to July 2011) consulted on potential strategic employment allocations, including Aykley Heads, and confirmed our view that development of this site would create a central business district in the City which would be attractive to the market both nationally and internationally.

13. This appears to be an attempt by the County Council to use semantics in support of its flawed approach to its planning responsibilities for Durham City. Most sources identify the phrase "central business district"[CBD] as a US-English synonym for "city centre"<sup>3</sup>, and it is clear that among the key characteristics of a CBD or a city centre are the convergence of transport routes; a concentration of retailing and professional activities; a node-point for civic, cultural and recreational services; and a high level of office employment. The BBC's on-line GCSE geography revision notes helpfully remind us that

The CBD is located in the centre because it is:

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3 For example, [http://en.wikipedia.org/wiki/Central\\_business\\_district](http://en.wikipedia.org/wiki/Central_business_district)

- a central location for road/railways to converge
  - the most accessible location for workers
  - accessible to most people for shops and businesses<sup>4</sup>
14. Durham already has such an area: indeed, the city's secular development pattern was defined by the convergence of radial road routes at the river crossings to the peninsula. Although the original mediaeval concentration around the Market Place expanded into Elvet and later along North Road towards the railway station, Durham retains a compact and recognisable city centre extending eastwards from the viaduct to the historic core around the Market Place and Cathedral. Even after the building of the new roads in the 1960s, the area described above remains the focus of public transport routes and of road access to the city, reflected in the high level of off-street parking provision within easy reach of the Market Place.
15. By contrast, although Aykley Heads has provided a focus of office employment since the migration of the County Council headquarters there from Old Elvet, it does not meet any of the other criteria of a city centre or CBD: most fundamentally, its location cannot be described as "central", either to Durham City itself, or to most of the city's wider catchment area. With one exception (its pedestrian accessibility to the railway station) Aykley Heads fails to meet the BBC's simple test for GCSE students which is quoted above. Since, as noted above, Durham is directly accessible by rail from only one other settlement in the county – Chester-le-Street – Aykley Heads' relative closeness to the station is not strongly relevant to a County Plan whose underlying objective appears to be increasing employment opportunities for all county residents.
16. In terms of local accessibility, a 2 km walking radius from Milburngate or the Market Place extends as far as the Sunderland Road estate and much of Sherburn Road, as well the whole of the south and west of the city to as far north as Framwellgate Moor. Applying the recommended 400m walking distance from a bus stop, most of the historic city centre can be easily accessed from the North Road bus station or stops, and this penetration is increased for routes to the city from the south and east which use the Market Place stops. While Aykley Heads is more accessible on foot from Newton Hall and Pity Me, its bus accessibility from the wider hinterland is poor except by those direct services which are routed via the Aykley Heads roundabout. Apart from the half-hourly local town services and the Park & Ride route between Sniperley and Belmont, regular buses crossing the city centre to serve Aykley Heads are limited to Arriva's routes X1/X2 and 7/7A and Go-Ahead's X21 Bishop Auckland-Newcastle service. There are no direct bus services from the east of the county, nor from the Crook, Deerness and Brandon areas, and the time and fare penalties of changing between buses in the city centre would make this an unattractive option for commuting to Aykley Heads. Though, as noted, certain through

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4 [http://www.bbc.co.uk/schools/gcsebitesize/geography/urban\\_environments/urban\\_models\\_medcs\\_rev2.shtml](http://www.bbc.co.uk/schools/gcsebitesize/geography/urban_environments/urban_models_medcs_rev2.shtml)

Arriva and Go-Ahead services are routed past Aykley Heads via the bus station, this adds around 5 minutes to cross-city journeys, as does the loop via Milburngate for westbound local services using North Road.

17. Even when using those direct bus services routed via the County Hall roundabout, the north-eastern parts of the proposed development site would be well beyond the recommended 400m maximum walking distance from a bus stop. For those travelling on buses which terminate in the city centre, the main entrance to the site is about 900m on foot from the North Road bus station, and the walk involves crossing both the A690 and the A691 on the level, unattractive at the best of times and particularly stressful during peak traffic. The direct walking route from the Market Place is over 1km, and is exposed for most of its length to pollution and hazards from traffic on the 40mph A691.
18. In modern urban development parlance, most of the Aykley Heads site is better described as an Edge City rather than a CBD – it will compete with, rather than complement, Durham’s city centre. Unfortunately, this will further perpetuate a trend which has already been established through the creation of out-of-centre shopping and employment centres at the Arnison Centre/Abbey Road to the north, and Dragonville/Belmont to the east, and through the outward drift of hospital and educational facilities and employment from the city centre.
19. The County Council and its predecessors have permitted and at times actively participated in this dilution of Durham City’s core functionality, and the consequent encouragement of additional car journeys at the expense of bus and active travel access. The creation of yet another off-centre employment zone will simply exacerbate to these trends. Indeed, despite the claims for accessibility which the Council makes for Aykley Heads, the size of the existing County Hall car park clearly demonstrates that, contrary to the Council’s sustainable travel policies, a large proportion of its own members and staff opt for car travel to reach this location.
20. It is difficult not to believe that the promotion of Aykley Heads has been opportunistically driven, and is more about finding solutions to the property issues facing the County Council and the Police Authority than about any real concern with the beneficial development of the city itself. While the *Preferred Options* document refers at para 4.52 to the constraining effect of the lack of city centre development sites, unique redevelopment opportunities have arisen recently at the County Hospital, Waddington Street bus depot, Old Shire Hall and Milburngate/Ice Rink sites. All of these are within or adjoin the existing city centre; are far more accessible by sustainable transport than Aykley Heads; and offer the opportunity for coordinated replacement and expansion of city centre employment opportunities in locations that can easily be reached from all of the wider hinterland.
21. In seeking to justify its choice of Aykley Heads, page 61 of the *Preferred Options* document dismisses the potential of other city locations. However, the wording in the

green box on that page appears to have been deliberately designed to mislead consultees: the only alternative sites in or close to the city which were considered in section 11 of the Council's Strategic employment sites selection paper are Mount Oswald, Meadowfield, Belmont Business Park, and Sherburn Grange: the two city centre sites named on page 61 (Milburngate and the Ice Rink) are not even mentioned in the Site selection "evidence paper".

22. Despite the language of page 61 of the *Preferred Options* report, the Council has therefore completely failed to address the issue of the current availability of several key central sites which are already well-integrated into the city's urban fabric and existing movement patterns, and which collectively provide a substantial strategic opportunity. Instead, the Council's fixation on Aykley Heads is such that it appears content to allow the market to find an after-use for these established and important sites, rather than discharge its key responsibilities as local and strategic planning authority by engaging actively in developing a comprehensive master-plan which recognises the key importance for Durham's future of the release of so many substantial central sites at the same point in the development cycle.
23. It is instructive to contrast the approach of Durham County Council with that of Preston City Council and Lancashire County Council. The latter share high-level objectives for Preston which are very similar to those which Durham County Council professes for our City, and indeed the language of key policy papers is very similar. A further coincidence is that both sets of proposals involve a main-line railway station and a county council HQ.
24. The crucial difference is that in promoting a revitalised Central Business District for Preston the local authorities have taken the defined city centre as their starting point, and anchored their proposals firmly within a context that respects existing movement and development patterns, as well as recognised professional nomenclature. This is expressed in terms of the following objective:

Provide a framework to ensure that the new CBD integrates into the city centre in terms of land use, physical form and movement patterns thereby supporting the overall regeneration of the city centre.<sup>5</sup>
25. Surely the citizens of Durham have the right to expect a similar approach from their own local authority.

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<sup>5</sup> Preston City Council, *New Central Business District for Preston: supplementary planning document, April 2011*. Accessed via: <http://www.preston.gov.uk/businesses/economic-regeneration/central-business-district/>