

Comment Receipt

Event Name	County Durham Plan Pre-Submission Draft
Comment by	The City of Durham Trust (Mr John Lowe - 440609)
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Consultation Point	Policy 3 Aykley Heads (View)
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Q1

Do you consider that this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant and Sound?

(Please note the considerations in relation to the Local Plan being 'Legally and Procedurally Compliant' (Please see guidance notes).

(Please select one answer for each question)

Legally and Procedurally Compliant Yes (Go to Q2)

Sound No (Go to Q3)

Q3

Why do you consider that this Policy/Proposal of the Pre-Submission Draft Local Plan is not Legally & Procedurally Compliant or sound? (Please select all that apply)

- . Justified
- . Consistent with national policy

Q4

If you do not consider this policy/proposal of the Pre-Submission Draft Local Plan to be Legally & Procedurally Compliant or Sound please use this box to explain why. Please note your representation should cover all the information, evidence and supporting information necessary to support/justify the representation as there is no opportunity to submit further representations unless requested to do so by the Inspector, based on the matters he/she identifies for examination.

The City of Durham Trust notes that Policy 3 is identified as a strategic policy but considers that this policy is **neither legally compliant nor consistent with National Policy** because no justification or evidence as to it being strategic as opposed to local is provided. This policy seems to combine both strategic and non-strategic aspects: allocation of land for a specific purpose (a to c) i.e. strategic, followed by details that would be used in judging a planning proposal (d to n) i.e. non-strategic.

The City of Durham Trust supports the revised allocation at Aykley Heads that now excludes the large plateau area in the Durham Green Belt. The Trust notes that in paragraph 4.55 the site can provide 4,000 jobs. It is most misleading for press releases and large advertising hoardings to be promising 6,000 jobs; this figure depends upon massively extending the employment site into the Green Belt, totally contrary to the undertakings given in Policy 20 to give the Green Belt the strongest possible protection.

The estimate is for completion of 48,698 square metres of floorspace; if the Parking and Accessibility Guidelines are applied, a total of 1,900 car parking spaces associated with the development would be allowed. The Trust appreciates the strengthened principles for development of the site relating to bus, pedestrian and cycle routes and the requirement for Transport Plans to ensure that reliance on the private car is reduced. However, the policy still includes point n: "*while providing sufficient parking to major investors and prestige businesses*". There is an unwelcome hint in this policy that, in order to attract prestige businesses, the Council might forego the opportunity to effect a real transformation in access to the site, and might permit car parking in excess of the guidelines. Many businesses now recognise health and productivity benefits that flow from enabling active travel to workplaces. The proportion of people driving to work in the site should be much closer to that achieved by city centre businesses and public sector employers such as the Passport Office, rather than a highly car-dependent business park. The policy does not protect the site from a standard level of car-parking provision and is therefore **not compliant with NPPF** sustainability requirements. The joint RTP/ITCPA publication "Rising to the climate crisis: a guide for local authorities on planning for climate change" (2nd ed., December 2018) includes among the key measures to promote sustainable transport "managing the provision of car parking (including consideration of charging for use), so that it is consistent with cutting greenhouse gas emissions" (see section 5.2, page 40).

The current wording of point (m) is insufficient to ensure that pedestrian and cycle improvements are delivered off-site to maximise active travel to the Aykley Heads. There are already pedestrian routes connecting to all adjacent facilities, satisfying point (m) as it stands, but the quality of some routes is very poor, with major road junctions like the B6532 roundabout being dangerous and off-putting for pedestrians and cyclists. The policy should look beyond the site boundary and ensure there are high quality routes to the heart of neighbouring housing areas. In its current wording it will **not be effective**.

The claim is made of "door-to-door" access to the Aykley Heads Employment Site from 60% of the county by bus within an hour, but this claim is not evidenced and is implausible. Policy 3 is thus **not justified**.

Q5

What change(s) do you consider necessary to make this policy/proposal of the Pre-Submission Draft Plan Legally & Procedurally Compliant and Sound?

The Policy should be amended such that the strategic element (the allocation of this as a Strategic Employment Site) is retained and the non-strategic elements (the management of that development) are in a non-strategic policy.

The Council should consider retaining the freehold of any car parking areas, and thereby maintain control over the motor traffic generated by the site. Ultimately this would be good for employers, as a co-ordinated permit system would be a useful tool to reduce congestion and encourage sustainable travel. If, over the life of the plan, the Durham City Sustainable Transport Delivery Plan delivers a strong modal shift away from the private car, such that less car parking is required at Aykley Heads, retention of the freehold would allow the Council to realise the value of the land by constructing additional offices or other facilities.

To ensure that active travel possibilities to the site are maximised and the need for increased motor traffic is reduced, modify point "m" to require that continuous, direct, safe and attractive pedestrian and cycle routes are provided to the city centre, and to the heart of neighbouring housing areas including Newton Hall, Framwellgate Moor and North End.

Amend point 'n' to read....."*while providing sufficient parking.*" i.e. delete "*to major investors and prestige businesses*". It would be inequitable for this clause not to apply to less prestigious businesses also.

Q6

Do you wish to participate in the Examination in Public? (Please note that the Planning Inspector will make the final decision on who will be invited to attend individual sessions at the Examination). Yes

Q7

Do you want to be informed of the following:

The submission of the Local Plan to the Secretary of State? Yes

The publication the Inspector report? Yes

Consultation on any Main Modifications? Yes

The adoption of the County Durham Plan? Yes