

## **DM/20/01846/FPA Land at Aykley Heads Durham DH1 5UQ**

*Hybrid planning application comprising detailed planning application for an office block (Class B1) with associated parking and landscaping on land known as Plot C and an outline planning application, with all matters reserved apart from site access, for the demolition of the existing County Hall site and the development of a business park (Class B1) with supporting retail and leisure uses comprising uses within Class A1 (retail), Class A2 (financial and professional services), Class A3 (food and drink), Class D1 (non-residential institutions) and Class D2 (assembly and leisure) with associated landscaping, multi-storey and surface car parking, servicing and relevant infrastructure.*

### **EXECUTIVE SUMMARY**

The City of Durham Trust has prepared a long and detailed response objecting to this complex planning application because it is of such significance for the future of the city. A summary of our main points is provided here and the detailed reasoning follows.

- Although the Trust supports in principle the designation of the bulk of the site as a business park, it cannot support and therefore objects to this application because it fails to deliver and conflicts with the policies that are in the modified version of the new *County Durham Plan*. The application is clearly being submitted prematurely as the result of the Main Modifications consultation is not yet known.
- The economic basis for promoting this new business park is rapidly changing and unreliable due to the impact of Covid 19.
- The Trust considers the green belt setting of the City and the World Heritage Site must be carefully balanced against new development. It objects to the application because heritage and the green belt will be damaged.
- The lifespan of large newer buildings in this part of Durham is only up to 70 years. This contrasts with the enormous economic benefit of the city's international profile based on the WHS and its city centre. This has taken 1000 years to develop but could be damaged very quickly by poorly thought out development.
- The green setting surrounding the city centre and WHS is easily damaged by new buildings on view in it. On either side of the proposed new buildings the hospital and police headquarters are very visible behind the WHS in views across the city. Because the new buildings will also be on show they will join up and cause harm to the setting of the WHS that cannot be undone.
- The green belt is particularly important in helping to stop parts of the City merge and in keeping the countryside on view and accessible from the built-up areas. The existing County Hall car park is part of the green belt and has only a small impact because it is set down behind landscaping.
- Building a three-storey office block on the car park obviously causes much more damage to the view into the parkland area than the car park does. It would cut down the amount of green landscape separating the older historic area of the City centre from the newer areas towards Newton Hall. It would also radically intrude into the views of the city from the approaches via the A691 and the B6532.

- The damage that will be caused by the development can be avoided by lower buildings and by not building on the car park. Landscaping alone cannot repair the damage it will cause. Because the Trust questions the real potential for attracting as much development to the site as is suggested, it does not think that this reduction in office space would affect the benefits the whole site would deliver.
- The application fails to address properly the issue of sustainability and the climate emergency.
- The application fails to deal properly with transport and accessibility issues.

## INTRODUCTION

While the City of Durham Trust is in principle supportive of the development of the Aykley Heads site for B1 office uses, we are not convinced that the underlying economic justification for the proposed scale of development has been established, particularly in the economic conditions prevailing as a result of the pandemic. The construction of new offices for the Passport Office, National Savings and new County HQ does not provide proof that there is demand for offices in the city centre: these are all in fact replacements for offices that were, or will be, demolished, and will collectively represent a reduction in their organisations' total employment headcount in the City. The demand for office accommodation in general is likely to be reduced and the offices currently under construction on the Milburngate site will become available earlier than the plots at Aykley Heads. Unlike Milburngate, Aykley Heads is not a city centre site. The hoarding round the new County HQ proclaims that the development will bring 1000 jobs into the city. Those jobs will be relocated from the current County Hall at Aykley Heads, so on the Council's own admission it is not in the city centre.

The fact that the planning application is for outline approval for most of the site and that it is expected to take 20 years for the whole site to be developed means that there is scope for the proposals to be adjusted to take account of prevailing economic conditions. The Trust urges the County Council to take a prudent view of the pace of development and to be prepared to review its current proposals in the light of changing and uncertain circumstances. In its response to the preliminary consultation held in March this year the Trust expressed concern that the County Council was rushing ahead with these proposals at a time when the *County Durham Plan* was nearing completion and just when the pandemic was introducing enormous uncertainty about the future of the economy and, indeed, of the nature of society. None of the submitted material makes any health and safety revisions based on COVID. There is no comment, for example, on ventilation systems or potential needs for deep cleaning.

The Appendix to this response contains details of issues that arise from the prevailing economic conditions and the health and safety concerns related to COVID.

The Trust remains convinced and concerned that these proposals are premature and in the first main section below we shall demonstrate how this planning application is at odds with the *County Durham Plan* and the *Durham City Neighbourhood Plan* which is also reaching the final stage of its development.

## OUTLINE OF MAIN CONSIDERATIONS

1. Approval of ancillary uses contrary to the *County Durham Plan* and the *Durham City Neighbourhood Plan*.
2. Unjustified intrusion into the Green Belt.
3. Adverse impacts on the setting and views of the World Heritage Site and the city.
4. Adverse impacts on the landscape at Aykley Heads itself.
5. Lack of attention to sustainability and the climate emergency.
6. Transport issues.

### 1. Ancillary Uses

The City of Durham Trust deplores the inclusion in this application of a list of non-B1 uses for planning permission in their own right: A1 (convenience retail, sandwich bar); A2 (financial and professional services); A3 (restaurant, snack bar, café); D1 and D2 (health facilities, crèche, gym). Such uses may be acceptable as ancillary and incidental supporting services for the B1 Offices use, but as such would not need to be granted independent planning permission.

In principle, such uses are town centre uses, and allowing a rival town centre to develop at Aykley Heads would undermine Durham city centre. Indeed, the supporting document *Sequential Assessment* in paragraph 4.24 provides a clear picture of what is aspired to at Aykley Heads:

*“The proposals also include a range of ancillary uses to support the functioning of the site. The presence of cafés, bars, convenience stores, gyms, schools, crèches and doctors help to create a sustainable community that appeals to occupiers.”*

The notion of a “sustainable community” without any residential component is a strange interpretation of NPPF and of the definition of that term in paragraph 72 of that guidance. Furthermore, it is extraordinary that the County Council has submitted to itself a planning application at Aykley Heads that proposes a range of retail and leisure uses that it has agreed to exclude from the Aykley Heads Business Park Policy 3 in the *County Durham Plan*. The County Council last year submitted its draft *County Durham Plan* for examination; these ‘ancillary’ uses were included in its draft Policy 3 for Aykley Heads. The Independent Inspector devoted a whole session to hearing arguments about Policy 3 and ruled that the County Council should prepare a Main Modification that removed all but B1 use from the policy to protect the city centre and ensure that the business park at Aykley Heads would be exactly that, a business park. The County Council has complied and the proposed Main Modification 24 removes all the non-B1 uses.

Public consultations on all 210 Main Modifications finished on 21 July and the County Council is considering responses, with a view to producing a modified Plan in September that the Inspector can declare "Sound". It makes a mockery of the examination and the undertakings given by the County Council to the Inspector to remove all but B1 uses from the Aykley Heads policy in the *County Durham Plan* when at the same time it was submitting to itself a planning application that explicitly proposes to allow all those other uses on the Aykley Heads site. The Trust considers that this manoeuvre is an abuse of process and should be halted.

The issue of ancillary uses at Aykley Heads is also covered by the *Durham City Neighbourhood Plan* in which Policy E1 (as modified) states:

*"The Aykley Heads Business Park: Proposals for development of B1a and B1b uses will be supported at the Aykley Heads site shown in Proposals Map 5 where these are in accordance with a masterplan or other design and development framework prepared under Policy S2."*

In the supporting text it is explained that any proposals for ancillary uses such as a café, a crèche, or a gym would be considered but must pass a strict test of meeting the needs of those working on the site. The views of the City of Durham Trust as set out above are entirely consistent with the position taken by the *Durham City Neighbourhood Plan*.

The Trust is perplexed by the remarks in the accompanying *Planning Statement* about the *Durham City Neighbourhood Plan*. Paragraph 4.0 states that *"The pre-submission draft plan was published in October 2019 for consultation, but the plan has not yet been subject to examination. Given the plan is still at an early stage of preparation, it has not yet reached a stage where weight can be afforded to it."*

This is simply wrong; the *Durham City Neighbourhood Plan* has been independently examined, and the Examiner's Final Report was submitted to Durham County Council on 14 July. Provided that his recommendations are accepted, the Examiner is satisfied that the *Durham City Neighbourhood Plan* can proceed to referendum. The Parish Council has accepted all of the Examiner's recommendations. The indications are that the County Council will too, and will be issuing its Decision Statement on the *Durham City Neighbourhood Plan* very shortly, which would be well before this application is considered by the County Council as Local Planning Authority. Government guidance is that, where the local planning authority has issued a decision statement detailing its intention to send a neighbourhood plan to referendum, that plan can be given significant weight in decision-making, so far as the plan is material to the application. The Trust knows that the County Council has been closely involved in the preparation of the *Durham City Neighbourhood Plan* and is astonished that such poor information as quoted above has been allowed to be included in its package of documents for the Aykley Heads planning application.

## 2. Unjustified Intrusion into the Green Belt

Plot A South is the flat, open, hard-surfaced area south of County Hall currently in use as the Members', staff and visitors' car park. The planning application documents recognise that it is within the Durham City Green Belt. In particular, the *Green Belt Justification Statement* seeks to put forward 'exceptional circumstances' justifying the proposed two office blocks on Plot A South. This document is riddled with wrong assertions, as follows.

Paragraph 1.2 says that "*the Examination Inspector has not sought any modifications to this part of the plan to ensure its soundness.*" In fact he did; his Action Point 13 and Main Modification 23 is to insert into Policy 3 the words "In this area and in any areas bordering the green belt which are developed or redeveloped, the layout and design of development and associated landscaping will provide for the retention or creation of readily recognisable and permanent features delineating the boundary of the Green Belt".

Paragraph 3.12 states "*The exceptional circumstances to justify the removal of the car park from the Green Belt would therefore be the unique economic opportunities a strategic employment site in this location brings in terms of more and better jobs and the opportunity to enhance the contribution that this Site makes to the Conservation Area and the setting of the historic core.*" This is a gross misrepresentation of the role of Plot A South. It is a very small part of the Aykley Heads site; without it there would still be the "*unique economic opportunities a strategic employment site in this location brings in terms of more and better jobs*". As for contributing to the Conservation Area and the setting of the historic core, it would be far better to turn this flat open area into greenery than into two office blocks up to 3 storeys high, blocking the views of the green hills beyond that are an essential component of the setting of the historic city. Indeed, the *Green Belt Assessment* is quoted in paragraph 3.12 as concluding that "*this area does contribute to preserving the setting and special character of historic towns.*"

Main Modification 23 is ignored in the *Planning Statement's* landscaping requirements for Plot A South; there is no mention of retention or creation of readily recognisable and permanent features delineating the boundary of the Green Belt. Here again, the County Council is formally modifying the County Durham Plan policies to meet the Inspector's requirements and at the very same time setting them aside.

Paragraph 4.3 addresses the prevailing national and local planning policy context and concludes "*given the Proposed Development is a new building in the Green Belt, it is considered to be inappropriate for the purposes of the NPPF.*" Further, Paragraph 5.3 acknowledges that "*as such, harm arises to the Green Belt by reason of that inappropriateness. As per the provisions of the NPPF, substantial weight must be attached to this.*"

However, this is all set aside in paragraphs 7.4 and 7.5. These are the concluding paragraphs and reach the required outcome: paragraph 7.5 declares that *“Very special circumstances exist and have been demonstrated to justify the harm to the Green Belt.”* The claimed special circumstances are in paragraph 7.4: *“The very special circumstances in this case are established and evidenced as:*

- *A clear absence of alternative sites;*
- *An identified need for the proposed development;*
- *Policy support for employment uses in the County and more specifically on the site; and*
- *Unrivalled economic, social and environmental benefits that cannot be captured without a single site development, as proposed.”*

The Trust disputes all four points. It observes that:

- There are plenty of alternative sites in Durham city for a couple of office buildings. The discussion of alternative sites was in relation to alternatives that could accommodate all 37,332 sqm of office floorspace and parking for 1,131 cars. Plot A South is for only 3,712sqm office floorspace and 62 car parking spaces.
- There is no “identified need” for the proposed development on Plot A South. The real need is for thousands of more and better jobs. Plot A South is 10% of the proposed Aykley Heads office floorspace. Therefore 90% of the “need” will be met without Plot A South. It is not indispensable. Prevailing policy support for employment is for the Aykley Heads area that is not in the Green Belt.
- The benefits can be very well captured without Site A South.

Thus the Trust contends that all four ‘exceptional case’ bullet points are at best misleading or, more precisely, simply wrong.

The green belt is particularly important in helping stop parts of the City merge and keeping the countryside on view and accessible from the built-up areas. The existing car park on this part of the site is part of the Green Belt and has only a small impact because it is set down behind landscaping. Building two three-storey office blocks on the car park obviously causes much more damage to openness and to the view into the parkland area than the car park does. It would cut down the amount of green landscape separating the older historic area of the City centre from the newer areas towards Newton Hall. In reducing the green buffer between the historic core and the newer built up area and also negatively impacting on the Conservation Area and WHS setting, the development will weaken the setting and special character of this historic town. And if it is reduced there is no compensation for the loss.

The County Council will appreciate that as part of the application site is in the Green Belt the application represents a major departure from the approved development plan for the area and must be referred to the Secretary of State.

### 3. Adverse Visual Impacts on the WHS and City

A development of this scale set against a city with a small historic core such as Durham triggers consideration of its context. For this site and generally for the city, the way the historic urban areas evolved has an intimate relationship with topography and the landscape; understanding this should underpin any assessment of development impacts upon it. The way scoping and Environmental Impact Assessments are structured tends to isolate topics rather than seeing the connection between them. The description below is the Trust's general response to the *Environmental Impact Assessment* that it considers underplays the significance of the area around and including the Aykley Heads site and its relationship to the City.

The key definition for the Trust is that of the inner setting as described in the World Heritage Site (WHS) management plan. As well as being the setting for the WHS it is effectively the setting for the historic city core, taking the approximate 1850s extents as a useful definition point before the later more extensive changes. Durham developed from the Peninsula into the surrounding lower areas, along the historic radial routes and river crossing points. Although there is some lower level spread, some of which is now considered character forming for Durham, the greatest spread has been beyond the surrounding ridges defining the inner setting and separated from the historic core. One of Durham's greatest assets is the apparent small size of the centre where the hillsides now offer a green setting and the River Wear valley penetrates right into the city centre. The importance of the setting for Durham in helping with its national and international recognition is not just of heritage or landscape importance. The combination with the WHS is what lifts the City into a higher recognition amongst historic cities. This has a long term economic benefit; it has a high significance that has taken 1000 years to develop.

The Trust has identified key requirements that it believes apply to assessing the impact of the proposed development and these are:

#### **Heritage**

- The importance of maintaining an unbroken green fringe to Durham's historic core and the WHS, actively conserving key WHS and city views.
- The prevention of interruption to the green valley sides of the River Wear as it penetrates into the City core.
- The maintenance of a high quality of development and active conservation of the landscape setting along the key and historic approaches into the City

#### **Landscape**

- Active conservation of the City's green setting avoiding impingement by development
- Active conservation of the River Wear Valley avoiding impingement by development

## **Green Belt**

- to check the unrestricted sprawl of large built-up areas – preventing coalescence with Newton Hall across and along the Wear Valley
- to assist in safeguarding the countryside from encroachment – maintaining the green wedge penetrating into central Durham
- to preserve the setting and special character of historic towns – the DCCA and WHS
- to preserve the openness of the green belt, sustaining views into the green belt areas

## **Impact of the Development**

The reasons for the parameters chosen for heights determining the individual block heights are not fully disclosed within the application documentation, but it appears to be the case that heritage, green belt and landscape have not significantly influenced the chosen constraints for the development. Some reference is made to concerns and restraining building heights but they are not revealed as central to design thinking. This was also not made available at the time of the masterplan consultation. Stewardship of the historic and landscape environment should at least be as central a concern of the County Council as economic sustainability, particularly since they are also so important for the longer term economic stability of the city and county.

## **Cumulative Impact**

The Trust does not agree with the varying definitions of scope of cumulative impact used in the *Environmental Impact Statement*. The Trust analyses impact as the reduction of quality of the City's green setting by building penetration over approximately 15 degrees of the 360 degrees setting of the WHS and City (approximately 1/25<sup>th</sup>). The visible adjacent buildings that lie in the higher part of this segment are the University Hospital of North Durham (the Hospital), existing Aykley Heads Business Centre (the Business Centre) and the new Durham Police headquarters (Police HQ).

Within the 15 degree segment and on the historic approach down to the city are the Milburngate development (that has removed trees, blocked a Cathedral view and pushed buildings closer to the road) and Riverwalk (that has blocked part of the view out of the city to its green setting and intruded into the river view).

Still within the 15 degree segment, the new Durham County Council headquarters (DCC HQ), its associated multi-storey car park and knock-on Sixth Form College car parking all have a relevant impact. These lie at a lower level but impact on the Wear valley by pushing development further into it, effectively extending the apparent built area and reducing the extent of the green setting. This lies on the Valley approaches into the City from Finchale and Kepier. The DCC HQ building has also blocked a Cathedral view. There is also interference in the setting from the railway station car park and its lighting and the Barkers Haugh sewage treatment works.

## **Parts of the Proposed Development Causing Impact**

Although the various illustrations from key viewpoints are especially difficult to read because of their reduced quality for downloading from the website, there is sufficient information together with written references and direct site observation to indicate where the main impacts lie.

### **Cross City and WHS Views**

Using the Mountjoy and St Aidan's viewpoints as the key examples, there is cumulative impact from the penetration of the rooftops/upper storeys that link the Hospital, Business Centre and Police HQ in the view behind the WHS. Subject to better presentation of illustrations, this appears to be mostly Plot A North and Plot E and rooftops on Plot B. Publicity for the development referred to WHS views from the site, but the inescapable corollary is that there are also views back to the development. (DCC Aykley Heads FAQ Website – *'The site is situated in a unique parkland setting, with **views of the UNESCO World Heritage Site**, walkable to the city centre, bus routes and the main east coast rail line.'*)

### **Wear Valley**

Using the Kepier Lane as the key view point there is cumulative impact with the Police HQ, station car park and sewage works. On the approach into the city there is cumulative sequential impact from the DCC HQ, station car park and the Radisson Hotel. Plot A North and Plot E are in view.

### **Framwellgate Peth Approach**

This involves the sequential view travelling along the road and, to a lesser degree, from Grade 2 listed St Cuthbert's Church and the entrance into Wharton Park. It also involves views into and across the tip of the green belt. The area together with the glacial mound are crucial in offering a break between newer areas of development and the steep drop down into the old city. It is an essential break between the built up areas helping to define the historic core. The impact is principally from Plot A South on the existing County Hall car park.

### **Negative Impacts**

**WHS** – Cumulative impact with existing development intensifying views of development behind the WHS in cross-city views and in panoramas including the WHS. Potential for lighting impact.

**Conservation Area and Setting** - Cumulative impact with existing development intensifying views of development in cross-city views and panoramas. Potential for lighting impact.

**Framwellgate Peth** – Intrusion of development in sequential views in approach to city and loss of landscape. Some loss of quality to St Cuthbert's Church setting. Severs the view into and connection with the green belt 'wedge'. Reduces the separation of 'old' and 'new' parts of the city.

**Wear Valley** – Intrusion of cumulative development into the valley landscaping and wider setting to Kepier Hospital. Cumulative impact on sequential approach into city and potential for lighting impact.

### **Mitigation**

Durham City has been very fortunate in the evolution of substantial tree areas within its green setting. This has arisen from a mixture of old woodland, deliberate planting and extensive regeneration. It has both formed the backdrop to views and blocked others. For extensive development, such as the University, it has enabled much larger and more prominent buildings than would otherwise have been acceptable on open slopes surrounding the WHS and historic city. Lack of management over long periods and no overall coordination for the future leave this legacy under threat as sustainable screening for major developments. These proposals attend to short-term works but as yet offer no promise of long-term care with clear woodland management aims. The screening and setting of the development present inherent risks in providing long-term effectiveness and mitigation

Currently the lifespan of major buildings in this sector of the city is only 60-70 years (see former Police HQ, County Hall, Milburngate House, part of Gates shopping centre). The possible lifespan of the proposed buildings due to building obsolescence by use or design is similar unless greater durability and flexibility for changing use can be demonstrated. New trees will take at least 30 years to become a useful size for this scale of development. This means that any trees will only be useful screening for about half the lifespan of the new buildings. Advanced planting within the developed part of the site will be especially difficult due to the very long development period and lack of space.

The prominence of the new Police HQ in long views across the city demonstrates how inappropriate use of materials can increase negative impact. It is appreciated that using materials such as Corten, external grilles and perforated rain screens can make the buildings more recessive, particularly with stepped profiles. However, the block forms remain, are on view in certain key views and combine with other already intrusive buildings to have a cumulative and therefore greater impact than otherwise might have been. In relation to visual impact, avoidance by reducing building heights is the only available option to prevent negative impact.

#### **4. Adverse Impacts on the Landscape at Aykley Heads**

The Trust's principal concerns about the overall design relate to the nature of place making, achievement of distinctiveness and special or exceptional design. The landscape of the existing County Hall is well established and in part of high quality. Together with the woodland areas it offers an organically inspired layout with some basic more geometrical terracing and spaces to allow for development. In contrast, the new scheme is very heavily reliant on the existing landscape and while it embroiders some new features through the layout, it is heavily developed with buildings, access and car parking. This means that the grid formation that can work as a counter-play to more organic elements is forced into an uncomfortable juxtaposition with the retained landscaping. There is very little room to

achieve campus or parkland setting within the development and increased intrusion into the existing landscaped areas

The intention is suggested as the creation of a high quality scheme equating to a high end business park. The space constraints and limited new landscaping prevent the development of a full campus or parkland setting. The north spine road already has high quality buildings such as Salvus House and Atom Bank (Rivergreen) but these together with the other buildings are not interrelated in an overall urban design context.

The scheme might result in good quality of individual buildings but it is not exemplary because of the site restrictions and the fact that it relies heavily on existing features. It will achieve some sense of overall place but this is only based on what is already there. In working within the existing landscape infrastructure the scheme may achieve basic place making but this fails to rise to the level of distinctiveness.

This development has failed to live up to the unique potential of the site in seeking only to limit damage to its surroundings rather than complementing them. Design standards and innovation in achieving a truly sustainable development that would be exemplary and therefore attractive to forward-looking and creative businesses are wholly absent.

No attention is paid to the need for continuing responsibility for maintenance of the site as a whole. It will be particularly important that the undeveloped parts of the site are beautifully landscaped and maintained in order to attract potential developers to complete the project.

## **5. Sustainability and the Climate Emergency**

Durham County Council had a proud record of promoting sustainability prior to the reorganisation of 2009, transforming centuries of the exploitation of nature into major restoration projects that have given us the Durham Heritage Coast, the County Council's decision to purchase over a 100km of liabilities for £1 from British Rail of abandoned railway lines that now provide superb walking and cycling routes, and above all the priceless achievement of ridding County Durham of 25 square miles of coal mining and industrial dereliction and its replacement by country parks picnic areas, nature reserves, and the planting of over 2.5 million trees. It is probably the greatest environmental achievement of any local authority in the land.

Despite this enviable track record, the planning application for Aykley Heads contains scarcely a mention of sustainability, let alone the urgent need to tackle the climate emergency that the County Council itself declared in February 2019. A climate emergency action plan for 2020–2022 was submitted to, and approved by, Cabinet in February 2020, but it contains no reference to any actions to be taken during the construction or operation of the business park at Aykley Heads.

The *Environmental Impact Assessment* actually states that climate change is of no significance in this application, that it was “effectively ‘scoped out’ for the purpose of EIA but will be addressed within the suite of documents supporting the planning submission.”

(*Environmental Statement, Volume 3, Non-Technical Summary, 4.8*) However, “the suite of documents supporting the planning submission” is remarkably reticent in addressing the critical issue of climate change, whereas this application should be an example to others.

Although there is a passing reference (*Design and Access Statement, p.46*) to energy efficiency under external lighting and to green roofs there doesn't appear to be any reference in detail within the documentation to achieving sustainability. On this tightly packed site there might be conflicts in incorporating new energy efficient systems that maximise sustainability and keep pace with legislative and regulatory changes given the very extended development period of the site. These might well have a bearing on the external appearance of the buildings and how the external spaces are used and designed. They should form a key point of attention if the development is to live up to its sustainability aim as referenced in the *Design and Access Statement*.

It is notable that the word “sustainability” appears just twice in its 95 pages. The phrase “climate emergency” does not appear and “climate change” occurs only in the list of NPPF sections that are relevant to the application. Similarly, the *Planning Statement* twice mentions “climate change” but only to reference the NPPF and not to deal with the issue substantively.

Item 7 of the *Application Form* asks about waste storage and collection. The response does not give the requested details and the answer to the question “Have arrangements been made for the separate storage and collection of recyclable waste?” is a simple “No”. This is hardly the expected attitude of a body that has declared a climate emergency and is working towards a sustainable, low impact and low carbon development.

The *Green Belt Justification Statement* does say that “all buildings on site will be built to modern energy efficiency standards” (6.53), but we are given no specific details, not even for Plot C.

Paragraph 3.9 of the *Sequential Assessment* document presents the version of Policy 3 that deals with Aykley Heads in the *County Durham Plan* as revised in accordance with the Inspector's required Main Modifications. This contains a section on “Sustainable Design” that includes mentions of sustainable development principles, methods of construction and transport, but there is no clear evidence that these will be put into practice when the Aykley Heads site is developed.

The *Drainage Strategy* covers the basic principle of sustainable urban drainage for surface water. There is reference to run-off storage ponds that is related to an integrated approach to controlling run-off during peak rainfall. Green roofs are also included in the 3D illustrations. Because the site is densely developed with buildings, paths, roads and parking it will be very difficult to accommodate run-off without very intense design, integration and use of built systems within the hard landscape areas. Permeable surfaces should be used wherever possible.

Of the 100 documents on the planning portal at the time of writing (4 August) only one makes detailed recommendations for measures that need to be taken to make the

development sustainable and meet the challenge of the climate emergency. Remarkably that is from a member of the public who lives in neighbouring Shiells Heights. The Trust fully endorses the very practical points he makes and urges the County Council to follow his example throughout the proposed development. Such attention to renewable sources of energy would be fully in accordance with Policy 30 of the new *County Durham Plan*.

## 6. Transport

### **The Climate Emergency**

A key contribution to sustainability and combating climate change has to be made by the transport arrangements for the site. The *Planning Statement* paragraph 5.37 states that the development will provide electric vehicle charging points and that “*the use of sustainable modes of transport will be encouraged through the inclusion of cycle parking provision and accessible, well-lit pedestrian routes*”. That is all it says about transport impacts. In a climate emergency, with over a third of UK carbon emissions attributable to transport, this falls far below what is needed.

### **Accessible routes**

There is no clarity in the application about which routes will be accessible by wheelchairs. The site accessibility audit in the Framework Travel Plan refers (para. 4.3.3) to a map which is missing, and Appendix E, the only map assessing footpaths, does not consider widths, gradients, or dropped kerbs. The application fails to “*address the needs of people with disabilities and reduced mobility in relation to all modes of transport*” as required by NPPF paragraph 110b. While it is appropriate to deal with some matters of detail in subsequent reserved matters applications, the general accessibility of the site, its layout, and the suitability of the Masterplan cannot reasonably be assessed with the information provided. The Planning Authority should require that the applicant provide the information needed to demonstrate how these needs will be addressed before determining the application.

### **Pedestrian access within the site**

The *Indicative Masterplan* drawing which has been submitted is understood to be just one example of how the development will eventually be shaped. Nevertheless, it does expose some weaknesses in the *Design and Access Statement*. For example, page 44 says that “*vehicular access and car parking has been carefully placed so as to prioritise pedestrian and cycle access*” but the *Indicative Masterplan* drawing shows vehicular access to Plot B being more convenient than the pedestrian and cycle routes. The Trust considers that more attention should be given to direct pedestrian routes between the building entrances to ensure that the development delivers a high-quality, car-free pedestrian network. The *Design Guide* needs to articulate the principles clearly, including widths, surfaces, lighting, and the prioritisation at road crossings, so that a good pedestrian network linking the buildings is created.

The Trust points out that paragraph 3.3.8 of the British Standards Institution's PAS 500 (published November 2008 but still current) emphasises the need for good physical design to support travel plans:

*"A travel plan retro-fitted on a site with large areas of car parking and little thought for the ways in which cyclists, pedestrians and public transport users can be prioritised through physical design is unlikely to be successful. A site that gives physical expression to the prioritisation of walking, cycling and public transport users will have a much better chance of supporting a higher modal share for these users than would otherwise be the case."*

The Trust concludes that the *Design Guide and Parameters* needs to be strengthened substantially to give this support. Attention should also be paid to the fact that the site is used by recreational walkers, particularly those seeking access to the green areas to the east.

### **Cycle access within the site**

The application is particularly weak on cycling. The *Transport Statement* only mentions the cycle route to the station in the section about pedestrian and cycle facilities (paragraph 3.6.1). Aside from promising that cycle parking will be provided, the only other references to cycling are in the analysis of STATS19 collision data, and in section 8, the conclusion, which merely states that *"it has been demonstrated that the proposed development can be safely accessed by pedestrians, cyclists, public transport users and motorists"*. The *Framework Travel Plan* also provides a cursory treatment. This falls well short of what is required.

The documentation is very unclear about the intended cycle network through the site. Often "pedestrian and cycle routes" are referred to, without any differentiation, despite some existing routes having steps. By not giving realistic information as to which routes will be suitable for cycling, it is not possible to assess whether the proposals give *"safe and suitable access to the site"* as required by NPPF para. 108b.

DfT recently published LTN 1/20, *Cycle infrastructure design*. This was anticipated by the *County Durham Strategic Cycling and Walking Delivery Plan* which states that its standards are to be observed in all new developments. The second of the summary principles of LTN 1/20 is that cycles must be treated as vehicles, and in most cases provided for separately from pedestrians. As many of the routes will be newly built or upgraded for the development, the applicant should provide clear information as to which will be designed for use by cyclists. The primary routes, and certain of the secondary routes, should have separate cycle and pedestrian provision designed in accordance with LTN 1/20.

The various visualisations give a misleading picture of the development. Although cars are pictured parked in car parks, the only people moving are on foot or bicycle. This contributes to making the park setting look very pleasant. The reality, given the amount of car parking

provided, will be that most of the access roads will be quite busy with cars at the start and end of the working day. It will be necessary to provide proper segregated cycle routes into the site if people are to be enabled to cycle to work.

### **Access to the site by walking and cycling**

The application does not adequately consider pedestrian or cycle access to the site. NPPF (108b) seeks to ensure that “*safe and suitable access to the site can be achieved for all users*”. The *Framework Travel Plan* mentions routes to the city centre, but there is no assessment of the main roundabout junctions neighbouring the site, or of the routes to Framwellgate Moor, despite paragraph 4.9.3 identifying many amenities in its Front Street as being much closer for access from the northern zone of the site than the city centre.

Section 4.5 of the *Durham City Sustainable Transport Delivery Plan* deals with the ‘north-western corridor’, and notes that “*walking and cycling network improvements around key attractors such as Aykley Heads, the Arnison Centre and to the new Council Headquarters are required in order to ensure that local people are encouraged to consider alternatives to private car use*”. The large roundabout junctions present “*intimidating and potentially hazardous conditions for cycling*” and are also listed as requiring safer crossing facilities for pedestrians. The junctions identified as requiring improvements include:

- County Hall roundabout
- The B6532 / Durham Road roundabout (at the north end of Aykley Heads)
- The B6532 / Dryburn Park roundabout
- The High Carr Road / Finchale Road roundabout

Improvements to the off-road pedestrian routes to the north of Aykley Heads to improve personal safety are also suggested. These would be relevant for people accessing Plots C, D and E.

The Trust therefore contends that the application has failed adequately to address the accessibility issues of the site. The build-out of the site is projected over a long period, and there needs to be a mechanism to ensure in an uncertain future that provision for sustainable transport improvements is secured. This will be harder to do if the issue is ignored during the planning application process.

### **Public transport accessibility**

Section 5.5 of the *Framework Travel Plan* covers public transport. It is suggested that each occupier will provide a public transport pass for all employees for a minimum of two weeks. The Trust advocates a permanent subsidised bus fare scheme along the lines of Durham University's contract with Arriva. Such a scheme is mentioned in the action plan in section 9 of the *Framework Travel Plan* as a point to investigate, and the Trust is strongly supportive of this approach.

Plots A and B, on the western edge of the site, are already served well by a number of bus services, including the Park and Ride services from Belmont and Sniperley. The challenge will be achieving access to Plots C, D and E, especially as these will be among the first plots to be occupied. Appendix G of the *Framework Travel Plan* shows that these plots are beyond the recommended 400m distance to a bus stop.

NPPF paragraph 110a says applications should have “*layouts that maximise the catchment area for bus or other public transport services*”. Policy 3(m) of the examined *County Durham Plan*, which designates Aykley Heads for development as a business park, says “*bus, pedestrian and cycle routes must be incorporated within, and connecting to, the city centre and other adjoining facilities*”. There is no indication in the application as to how the applicant proposes to comply with this policy in respect of bus services, as none are indicated within the site.

The Trust considers that a dedicated bus service between the town centre and the interior of the site needs to be in place from the outset, secured by ongoing planning obligations on the developer(s). There should be transfer tickets available at no extra cost to through passengers interchanging with all other operators’ services, or rail services, either at the bus station or the B6532 bus stops. The service could enter the site via the County Hall roundabout, and proceed north through Plot B onto the gated access road, then turning east to serve Plots C to E and the rest of the existing site.

In summary, as presented, bus travel into the site is likely to remain poor except in the area of the existing County Hall. Without positive measures, bus travel to anywhere on the Aykley Heads site that is further away from the main road than County Hall is likely to remain less attractive and fail to assist in meeting the modal change aims of the County Council.

#### **Car parking: location and management**

The Trust welcomes the statement in the *Framework Travel Plan* that it is expected that car parking will be managed by the site operator, with a pricing model used to manage demand (paragraph 5.6.9).

The *Travel Plan* states in paragraph 5.6.12 that as well as Park and Ride sites, there are “*a number of public and private car parks in close proximity to the site (such as the surface car park at Carlial Square and the multi-storey car parks at Dean Street, Manors and Quayside) which provide significant spare parking capacity*”. The Trust hopes that this is the only lapse by the applicant and that the rest of the data in the plan pertain to Aykley Heads rather than Newcastle city centre.

### **Quantity of car parking**

The application proposes 1,131 car parking spaces. The *Indicative Masterplan Phase 02* shows an additional “committed existing parking (100 spaces)” for Plots D and E. The total provision for the whole development will therefore be 1,231 spaces, which is only very slightly less than the maximum figure of 1,281 set for Aykley Heads in Modified Paragraph 4.58 of the *County Durham Plan*. The Trust is fully supportive of the Examination in Public Inspector’s instruction that the Plan should strictly limit the provision of car parking spaces at Aykley Heads so as to reduce reliance on the private car. The Trust would welcome the replacement of the token reduction by a more significant reflection of the Inspector’s requirements. In that regard, the *Travel Plan* states in paragraph 5.6.3 that the allocation of parking spaces to an individual building will not exceed 1:40 sq m Gross Floor Area (GFA). The GFA is found in the key to the Indicative Master Plan Phase 10 document as being 38,468 sq m. On a ratio of 1:40 this would correspond to 962 car parking spaces. The Trust considers that this should be the figure set as an absolute maximum in the Masterplan.

### **Modal split targets**

The Trust objects to the approach to the establishment of the initial target in the *Framework Travel Plan*, which is identical to the car mode share in the 2011 census. The British Standards Institution's PAS 500:2008 states very clearly that in establishing preliminary modal split information a workplace travel plan for a new site “shall make reference to good practice examples in the UK to provide a clear picture of what the travel plan can achieve in the location type” (para. 3.3.2). PAS 500:2008 expects travel plans for new sites to drive modal shift from the very start, when it is easiest to form new habits.

Durham University travel surveys show that in 2017 just 53.2% of university staff were driving to work, with a further 12.8% using car share. It is clear that the initial targets for the Aykley Heads site, which has been promoted as being highly accessible, should be much more ambitious.

The Trust notes that the short term target (years 2-3) is of a 2% reduction in car drivers, and a long term target (years 3-5) is also of a further 2% reduction. PAS 500:2008 states that on average travel plans can reduce the number of single-occupancy vehicle trips to a destination by 18%.

The UK needs to cut carbon emissions by 7% every year for the next decade. Durham County Council has declared a climate emergency, and should be requiring travel plan targets for a significant reduction in the absolute number of car trips, which could be met by encouraging employees to work from home at least part of the week. A much greater reduction in emissions could thereby be achieved.

Plot C represents 10% of the total floor area of the business park. The number of employees working in Plot C would be around 400. If 76% of these drive to work, as initially suggested in the *Framework Travel Plan*, 304 spaces would be needed. What is proposed is 130 parking

spaces. Without an adequate travel plan with large scale interventions, we will quickly see pressure mounting for additional parking spaces, overspill into residential areas, and adverse impacts on the highway network.

The inadequate targets are enough to render the plan unacceptable and the Trust suggest that an ambitious *Framework Travel Plan* should be required to be submitted by the applicant before the Planning Authority determines the application.

### **Other measures**

Section 8 of the *Framework Travel Plan* proposes sustainable travel initiatives; all are essentially promotional. While these are supposed to complement the physical infrastructure detailed in earlier sections, there was only superficial assessment of the quality of walking or cycling access beyond the site boundary, and therefore opportunities to identify off-site improvements have been missed. Promotional measures will not get very far when there are significant issues with the safety and convenience of pedestrian and cycle access to the site.

Some of the essential steps in forming a travel plan are lacking, including fixing a budget (see p. 7 of PAS 500:2008). Determining a budget, either at a site-wide level or via individual Occupier Travel Plans should at least feature in the Action Plan in section 9 of the *Framework Travel Plan*.

### **PLOT C**

Most of the general points made above are also applicable to the specific proposals for Plot C. The lack of reference to energy sustainability follows through from the outline application into the detailed design of Plot C. Again there appears to be no reference to how sustainability might be achieved. Incorporating future-proofed flexibility could have an impact on building design and materials but this is not shown. There is no reference to the specific design of a sustainable urban drainage system or a green roof but there is an extensive external ponding system shown. The car park area would need to be integrated into a full system as well as roof run-off and this may well impact on the layout and treatment of the car park. Permeable surfaces should be used wherever possible.

The building design with its use of Corten steel has potential to be an interesting addition to the northern sector of the site. With the exception of SUDS areas within the landscape 'tail' to the site, the car park areas and immediate building setting are narrowly constrained. They do not offer a campus style setting; trees are lost from the frontage and not replaced. The setting of the north spine road is weakened. There is heavy reliance on the existing woodland belt (W1).

There is no demonstration of the relative height of the screening woodland and the building shown on the sections and this remains a concern for visibility. Lighting has local scope for impact: the sizeable principal signage is proposed to be illuminated.

## CONCLUSION

As stated at the beginning of this response, the City of Durham Trust is in principle supportive of the development of the Aykley Heads site for B1 office uses. This is in full accordance with Policy 3 of the *County Durham Plan* and Policy E1 of the *Durham City Neighbourhood Plan*. The Trust is also aware that a recent announcement of government funding supports the proposed development, but finds it difficult to comprehend how such an announcement could have been made before the determination of the planning application, even though the County Council is obviously promoting its own application.

However, the response we have made demonstrates that there are many issues that are not satisfactorily addressed in the current application, so the Trust objects to it in its present form and scope. The economic situation is particularly uncertain as the pandemic continues to cause serious problems. The climate emergency remains just that, an emergency that needs urgent attention which this application does not provide. At a very local level, both the *County Durham Plan* and the *Durham City Neighbourhood Plan* are nearing the close of their development.

All these factors lead the Trust to urge caution on the County Council. We share the desire for economic development in the county and in Durham City itself, but not at any price. This application should be withdrawn pending clarification of the above factors. In particular the outline planning permission sought for the whole site needs re-thinking and made fit to respond to the major challenges that we currently face.

## APPENDIX

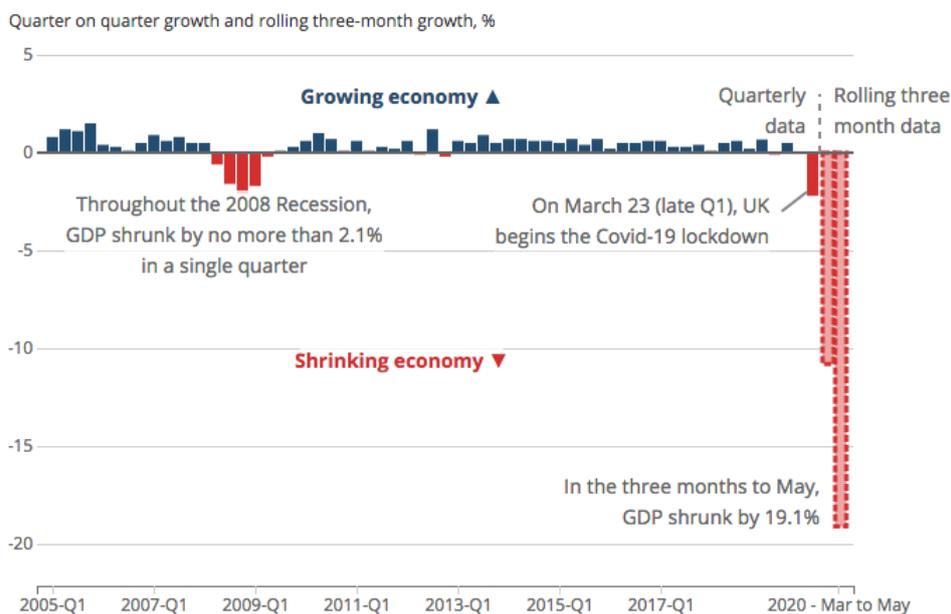
### Concerns on the grounds of economy, health and safety in the light of Covid

Aykley Heads was identified as a Strategic Employment Site in 2018, and again in the *North East Strategic Economic Local Plan* (January 2019). Since then, the application has not been updated in the light of Covid. The business case and its planned infrastructure are presented as if the pandemic had never happened.

#### 1. Business case ignores current economic situation

The application ignores that the UK GDP fell by 19.1% in March-May 2020.<sup>1</sup> At the worst time of the 2008 economic crisis, GDP decline never exceeded 2.1% in a single quarter. The post-Covid economic impact has dwarfed the 2008 recession by a factor of almost 10.

UK GDP growth, Quarter 1 (Jan to Mar) 2005 until March to May 2020



Source: Office for National Statistics

Despite these current economic facts, the application has not changed its rationale for the demand for business space, the creation of jobs, and the expected average salary resulting from such new employment. It thus fails NPPF Objective 6, “Building a strong, competitive economy”:

- NPPF 81d) Planning policies should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices... and to enable a rapid response to changes in economic circumstances.”

<sup>1</sup> Office of National Statistics, UK GDP monthly estimate, May 2020, released 14 July 2020.

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/conditionsanddiseases/articles/coronaviruscovid19roundupeconomybusinessandjobs/2020-07-02>.

## 1.2. Unrealistic figures for anticipated employment and wages

Aykley Heads is expected to provide “up to 4,318 FTE jobs when operational” (*Planning Statement*, 5.36). These jobs, estimated at £144.5m per annum in employee salaries, translate into £33.5k pa in average annual income. In May 2020, the national average annual income before tax was £24,232 (£466/week x 52) in real terms. This income was still at a level *before* the 2008 economic downturn.<sup>2</sup> The fact that average income has, twelve years after, still not recovered to pre-crisis levels, illustrates the stark challenges in the current economic climate with its multiple of GDP downturn. The Aykley Heads development cannot possibly exceed the current national average annual income by almost £10k in the near future, in the context of a global post-Covid depression.

## 1.3. No evidence for need of extensive, central grade A business space

The *Planning Statement* asserts demand for Grade A space in the city centre (3.16, 3.19) but shows no evidence of a single prospective tenant from outside Durham. Of the examples given, the passport office was already previously located in the city centre; Durham County Council itself was moving from Aykley Heads to the city centre. The application has thus created its own demand. It is as yet unclear which businesses will move into the current Milburngate development and whether the latter’s capacity will be fully needed. The *Planning Statement* goes on to contradict its own request for central Grade A space with the statement that prospective “footloose” tenants may not require a city centre location (3.20).

As for the demand in Aykley Heads itself, Salvus House is “approaching full occupancy” (3.21): in other words, even current provision has not been fully taken up. The application further cites Waterstons, a computing consultant, whose move into Northumbria House is used as indicator of attractiveness. Waterstons already resides in walking distance, at Liddon Court DH1, and will basically move across the road. This is not “clearly proven demand for the location”.<sup>3</sup> Again, the application indicates no major player from outside Durham whose interest might justify a development of 4,000 grade A work spaces.

The application’s business case is based on space metrics rather than demand: available land is converted into business space, based on OffPAT estimates of employment density. This constitutes the potential availability of facilities, but not evidence for demand. The idea that “supply will create demand” is unrealistic.

The calculation itself is flawed. The original County Plan provided 48,000 sqm of office floorspace at Aykley Heads. Using OffPAT/HCA employment metrics, the Plan argued that this space would enable 4,000 jobs. The present application has reduced this to “up to 38,468 sqm of floorspace”, yet still it promises to deliver the same employment number of “circa 4,000 jobs”, indeed “upwards to 4,318 FTE”. Actual office floorspace, class B1, is up to 37,332 m<sup>2</sup> GEA.<sup>4</sup> If OffPAT/HCA guidelines were to be applied, NIA (net internal area) figures should be used, not figures that include gross external areas – unless the applicant counts a loading bay as a FTE workspace.

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<sup>2</sup> Office of National Statistics, <https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/bulletins/averageweeklyearningsinbritain/july2020>.

<sup>3</sup> DPP Planning, *Planning Statement*, June 2020, 3.21.

<sup>4</sup> DPP Planning, *Planning Statement*, June 2020, 3.24 and 5.36.

## 1.4. Absence of supporting evidence: two missing studies in application library

In support of its business case, the application cites the “Cushman & Wakefield Review 2020” and a “JLL Market Study” from October 2019 (*Design & Access Statement*, p.39; “Research by JLL shows”, *Planning Statement*, 5.35). Neither study has been included. We ask for both documents to be supplied.

We also note that the above JLL market study is dated pre-Covid. Cushman & Wakefield’s currently available *Outlook 2020* study represents a broad-based focus on Europe in general, dated December 2019, therefore also pre-Covid.<sup>5</sup>

**Overall, the application’s business case fails to meet the following tests as outlined in NPPF (2019):**

- “plans should ... be sufficiently flexible to adapt to rapid change” (NPPF 11a)
- the application has no “up-to-date development plan” (NPPF 11c)
- plans should be “aspirational but deliverable” (NPPF 16b)
- plans should be justified “based on proportionate evidence” (NPPF 35b)

## 2. No revision of architecture in the light of post-Covid health and safety

### 2.1. Sub-standard density of work spaces

The *Stage 3 Architectural Specification* (13 July 2019) has undertaken no revisions that reflect the pandemic. The planners do not indicate what measures might be taken to deal with traffic, both exterior and interior, and social distancing.

The envisaged building in Plot C features workplaces for 440 workers in altogether 3 open plan offices spread across three levels; on the first floor the density is around 5.56m<sup>2</sup> per worker (216 persons in this open plan office). A more generous outlay on the third floor allows 9.192m<sup>2</sup> per person in the open plan office.<sup>6</sup> These figures most likely translate to sub-standard density. The OffPAT norms are:

- B1(a) call centre: 8m<sup>2</sup> NIA per FTE
- B1(a) general office space: 10-12m<sup>2</sup> NIA per FTE; since 2001, the recommended density for general office space has been 11.5m<sup>2</sup> area per FTE.<sup>7</sup>

As mentioned before, the aspiration of 4,000 jobs relies on OffPAT estimates.<sup>8</sup> Actual density in the Plot C designs is higher and thus casts doubt on the assertion that Aykley Heads will accommodate 4,318 FTE in attractive, grade A, B1 facilities beyond the standards of a call centre.

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<sup>5</sup> *Outlook Europe 2020*; a set of bulletins dated December 2019, <https://www.cushmanwakefield.com/en/united-kingdom/insights/real-estate-outlook-2020>.

<sup>6</sup> See floor plan 3D isometrics.

<sup>7</sup> OffPAT, *Employment Densities Guide*, 2<sup>nd</sup> edn 2010. B1(a) General office 12 sqm NIA; B1(a) Business Park 10sqm NIA blended rate of above B1a uses at out of town business park locations; B1(a) serviced office 10 sqm NIA. Use class classifications, 3.3, 4.43.

OffPAT guidance itself recommends that planners should, when considering employment density, “take account of the prevailing economic context, e.g. is it an economically buoyant or depressed period” (4.41). This has not occurred in the present application.

NPPF 97 provides that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless they achieve appropriate densities. This surely should apply also to a location like Aykley Heads.

## **2.2. Failure to engage with post-Covid best practice: ventilation and other hygiene measures**

The Planning Statement considers *external* air quality (such as traffic and potential pollution during construction, 5.117-20), but not *internal* air quality. There is no indication of the ventilation systems that will power the buildings. (The only consideration given to air flow in the present documentation regards the Dyson Airblade V hand dryers in the toilets.<sup>9</sup>) The windows systems (double glazing obscured glass panels to plenum/structural zone; Kawneer AA720 or equal) appear to be fixed, and the designs suggest they cannot be opened. Central ventilation is a crucial issue. For example, Durham University’s building have been closed for over four months since late March 2020, one reason being that percolating office ventilation constitutes a potential hazard for staff.

The application thus contravenes NPPF 181: “Opportunities to improve air quality or mitigate impacts should be identified.”

The application also fails to consider measures such as deep cleaning, as would be appropriate in buildings of such dense footfall as in Plot C. There, flooring in the open plan offices and stair cases will have carpet tiles.

In a post-Covid scenario, high-density spaces below recommended norms are a health and safety hazard. A future-proof class A development should ensure that there is no risk of extended closure due to considerations of hygiene.

Indeed, the very consultants which the application lists in support of its business case recommend flexible solutions, working from home, and avoiding large concentrations of people as a sustainable long-term strategy: ‘the notion of putting 7,000 people in a building may be a thing of the past’.<sup>10</sup>

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<sup>8</sup> Durham Employment Land Review 2018, *Planning Statement*, 3.15. This Land Review relies on OffPAT estimates for employment density.

<sup>9</sup> *Stage 3 Architectural Specification*.

<sup>10</sup> See Cushman & Wakefield, advising on best practice in Covid recovery, <https://www.cushmanwakefield.com/en/united-kingdom>; ‘How are companies re-thinking their corporate HQ?’, JLL Market Study, citing Jes Staley, CEO, Barclay’s Bank, <https://www.jll.co.uk/en/trends-and-insights/workplace/hubs-and-clubs-the-next-step-in-customising-the-workplace>; also <https://www.jll.co.uk/en/trends-and-insights/research>.

**Comprehensively, the application fails to meet NPPF’s “social objective” as well as guidance on “Promoting Healthy and Safe Communities” / “Achieving well-designed places”, as follows:**

- NPPF 2 b) social objective: a “well-designed and safe built environment”;
- NPPF 91) “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” which (c) “enable and support healthy lifestyles”;
- NPPF 122 e) “securing well-designed, attractive and healthy places”;
- NPPF 127f) “Planning policies and decisions should ensure that developments create places that are safe ... and which promote health and well-being”.