

THE CITY OF DURHAM TRUST

Phone (0191) 386 2595
Email chair@durhamcity.org
Web site:<http://www.DurhamCity.org>

c/o Blakett, Hart & Pratt, LLP
Aire House
Mandale Business Park
Belmont
Durham, DH1 1TH

27 October 2020

Mr Lewis Stokes
Banks Property
Inkerman House
St John's Road
Meadowfield
County Durham DH7 8XL

benthouselane@banksgroup.co.uk

Dear Mr Stokes

Consultation on the Bent House Lane development

Thank you for agreeing to allow the Trust to make initial comments on the Bent House Lane Scheme after the indicative deadline of Friday, 23 October, and we look forward to the Zoom discussion on Wednesday 4 November.

The Trust welcomes the public consultation initiated by the Banks Group prior to making a formal planning application, and is pleased that the consultation leaflet aspires to an indicative masterplan for the whole of the Banks Group's part of the 'Sustainable Urban Extension' designated in Policy 5 of the Adopted County Durham Plan 2016-2035.

We promised to provide written comments on the leaflet this week, so here are our principal thoughts amplifying how this development can be an exemplar of the principles of sustainability, of the County Council's commitment to tackling the Climate Change Emergency, and of the Government's enthusiastic endorsement of the report of the Building Better, Building Beautiful Commission.

In taking this approach we are working with the Friends of the Durham Green Belt and the City of Durham Parish Council. The site of course lies outside the Parish Council area but we understand that it is just as keen as the Trust to assist in any way it can towards the achievement of a development worthy of Durham City.

The starting point for the Trust is the extraordinary heritage qualities of Durham City framed in a green landscape bowl which have rightly caused much-needed major housing development to be located beyond the rim of that bowl. Debates over very many years have been devoted to the question of whether parts of the Durham City Green Belt could be used to meet some of the city's and County's housing needs. That matter has been settled by the acceptance of the Examination

THE CITY OF DURHAM TRUST

in Public Inspector's required Main Modifications and the formal adoption of the County Durham Local Plan on 21 October 2020.

At the same time, the Government has enthusiastically endorsed the report of the Building Better, Building Beautiful Commission to promote and increase the use of high-quality design for new build homes and neighbourhoods.

This is therefore a critical moment to establish the true principles of sustainability, design and other key policies to ensure satisfactory development. Some of those principles are laid down in the Inspector's report:

"96. Because of the site's location and relationship with heritage assets, development needs to be sensitively designed and landscaped. This can be ensured by the requirements of parts n, o, s and t of policy 5, although a number of modifications are required to the detailed wording and the reasoned justification to ensure that they are effective in preventing any harm to the setting of heritage assets and safeguarding the character and appearance of the area."

"97. The motorway and its wooded embankment would represent a readily recognisable physical feature to provide a permanent Green Belt boundary to the east. The southern boundary is currently weakly defined by a fence and recent planting at the point where the land starts to fall more steeply. Part t of policy 5 (subject to MM53) refers to a 20 metre wide landscaped area which should be effective in creating a recognisable and permanent Green Belt boundary in this location. A hedge along the proposed Green Belt boundary and existing buildings at Bent House Farm would separate the development from the open countryside to the west, and part n of policy 5 should ensure that the character of the farm is protected."

"98. Part s of policy 5 would ensure that the proposal delivers compensatory improvements to the environmental quality and accessibility of remaining Green Belt land in the Old Durham Beck valley."

In addition to these directly applicable tests as captured in Policy 5, the relevant policies of the County Durham Local Plan such as those on affordable housing provision, meeting the needs of older people, and delivering sustainable transport will all be engaged. The notion of 'lifetime housing' should be 'in the mix'. All these matters should be expressed in a masterplan, which must also identify and deliver packages of land to meet the short, medium and long term demands as anticipated by the County Plan population and housing forecasts. This will ensure that development is phased in smaller and distinctive units avoiding a continuous building site appearance, and in a timely fashion where progressive improvements in housing style, technological change and function are possible.

So the key to a satisfactory development here is an agreed masterplan, as required by Policy 5: ***"Development is required to be comprehensively masterplanned and to demonstrate how the phasing of development on these sites will have regard to the provision and timing of the infrastructure and services necessary to support them. The sites will deliver attractive, well designed places, incorporating sustainable development principles, adopting sustainable construction methods, and using appropriate densities across the sites in accordance with Policy***

THE CITY OF DURHAM TRUST

29 (Sustainable Design in the Built Environment). Design codes will be utilised to ensure distinctive, high quality design outcomes for the sites."

Taking that on board, and subject to what emerges from the Zoom discussion, our responses to the specific contents of the consultation leaflet are as follows.

- The consultation leaflet promises "*housing with a good sustainability rating*". The Trust believes that the rating needs to be better than just "good". The highest levels are clearly not achievable with a traditional medium density layout with road access dominating.
- There is a nearly complete spine road where a pedestrian, cycle, ecological, social and play environment should be.
- "*A contribution towards affordable housing*" seems to be a less than full commitment to the provision for local people. Does this imply the affordable housing is to be built elsewhere in possibly less satisfactory locations?
- There is no mention at all of the sources of energy and indeed how much energy can be generated from the site by studying the applicability of a district heating scheme from for example a small heat and power plant, the provision of solar power, air or ground source heating. It is a key metric for the sustainability of the housing to avoid the provision of housing that in a few years will suffer an energy deficit as gas is phased out.
- This is clearly a car dependent development and almost completely unsustainable without some accommodation of greatly enhanced public transport within the site remembering that a generation of electric buses is close now. As a minimum, greatly improved bus stands with traffic calming and comfortable waiting facilities should be provided.
- The impact of vehicular traffic to and from the site on the A181 and wider road network must be assessed and mitigated.
- The impact on the setting of the World Heritage Site must be thoroughly investigated and any effects on the inner setting of the World Heritage Site must be minimised and harmful impacts avoided.

The Zoom discussion and subsequent engagement will provide welcome dialogue and illumination of the issues and solutions. We look forward to an outstanding development that indeed provides a worthy gateway to the city.

Yours sincerely

John Lowe
Chair, City of Durham Trust

cc Stuart Timmiss, Head of Development and Housing, Durham County Council
Adam Shanley, Clerk to the City of Durham Parish Council
Kirsty Thomas, Chair of the Friends of the Durham Green Belt