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Durham, DH1 1TH
21 July 2021

Dear Ms Ollivere,

**DM/21/02034/FPA Land At Former Skid Pan North Of Woodward Way Aykley Heads
DH1 5ZH**

*Proposed development of 57 residential dwellings with associated infrastructure, open space,
and highway improvements*

Introduction

1. The site is one of the housing allocations in the County Durham Plan. However, this application demonstrates the difficulty in realising the allocation when faced with the reality of its sensitive context and the need to fulfil planning policies. There are substantial failings in the application leading to negative impact. The Trust therefore objects to the proposal.

Context

2. **Planning.** The County Durham Plan indicted an expected housing yield of 50 units. It specified landscape requirements to mitigate the site's removal from the Green Belt designation. Any weakness in these requirements or the supporting assessments for the County Durham Plan are exposed in this application. The Durham City Neighbourhood Plan and its policies apply to this site.
3. **Transport and Access.** Adequate planning for sustainability in terms of transport, cycling and walking are important components in achieving sustainable development and should be reflected in the approach to layout and access. It needs a clear demonstration of how development proposals minimise carbon impacts.
4. **Landscape –** The application site is an important component of a stream valley side that in turn forms part of the terraces to the River Wear. Previously part hard surfaced as the driving training area of the Police headquarters, it also includes an important area of open space and developing woodland. The strategic value of the valley is confirmed by its inclusion as the termination of the Green Belt and as an Area of High Landscape Value (AHLV). This separates Durham and Chester le Street but also, very importantly, the historic City and its newer suburbs. It also separates Framwellgate Moor and Newton Hall housing areas. The slope also makes the development site particularly prominent in what is otherwise a valuable greenspace. The housing allocation area based on the former hardstandings protrudes into the valley and greenspace that, under previous City of Durham policies, was formerly included in the AHLV. It is a small development outlier

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surrounded by open space except for its connection back to the Phase 1 housing area. The area acts as a setting generally to Aykley Heads and an open space provision for the surrounding neighbourhood residential areas. It is an edge of built area development and will form a new settlement boundary. It is also a valuable biodiversity resource in combination with surrounding open space including the Hoppers Wood ancient woodland. The risk from housing development is intrusive impact on the Green Belt and its role in separating development areas and as a local open space resource and biodiversity.

5. **Heritage** – The application area forms the boundary of the World Heritage Site inner setting boundary. The broad definition rather than a tightly defined line was used because of buildings along the boundary area with potential for impact on the setting. Due to the return of the valley into the built areas, the area is not prominent in any WHS views. However, the trees of the area are of general significance in boosting the protection of the setting edge in containing the historic city core and retaining its small scale. This is an important factor in conserving the dominance of the WHS over the core City. It lies outside the city conservation area but similarly acts as a buffer between it and the surrounding newer suburbs. The risk from development is of reducing the buffering value of the green space with prominent development. The proposals are two small ‘enclaves’ in a landscape setting and identifying local examples from heritage areas would be of value in seeking development distinctiveness.
6. **Design.** The County Durham and Neighbourhood Plans have policies that require response to local character and distinctiveness. The Neighbourhood Plan contains several policies that are intended to foster high quality and distinctive design.
7. **Sustainability** - Both Durham County Council and the Parish Council take the threat of climate change seriously and have reflected this in the County Durham and Neighbourhood Plans. The County Council has declared a climate emergency. The CDP includes reference to expectations of development contributing to achieving zero carbon targets. It has backed this up with other reports and information. As an example, it promotes the use of the Home Quality Mark in relation to new housing. The Neighbourhood Plan also includes ambitions for new development to achieve high levels of sustainability. Because of the aims and policies of both County and Parish Councils, a thorough and ambitious drive towards sustainability is needed. As an example, the context for gas boiler provision is changing and homes need to be either initially fitted out to meet forthcoming changes or future proofed through the heating system being capable of switching to alternative boiler types.

Information Submitted

8. **Statement of Community Involvement** - Although noted as agreed with the planning case officer, the submitted statement is based on limited consultation with the adjacent Phase 1 estate, missing the other areas of housing nearby. Some of this housing is as close to the proposed housing as Phase 1. Response was extremely limited and failure to respond was taken as positive support for the proposal.
9. **Planning Statement** - The Durham City Neighbourhood Plan is now adopted and forms part of the Development Plan. The application site is within the Neighbourhood Plan area and

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its policies apply. Under section *Heritage* 5.33 there is no reference to the World Heritage Site inner setting that includes the site.

- 10. Sustainability Statement** – The site is referred to as being owned by the Church Commissioners, but this is at odds with the Planning Application ownership information and needs clarification. It is a very minimal document that simply notes Government Zero Carbon policy and identities which measurement system will be used to demonstrate how the development meets building control requirements. The Home Quality Mark is not referred to and no targets or objectives are indicated. There is no reference to sustainable transport. The ban on installation of gas boilers to new development is to happen and may impact on the later stages of the build out of this scheme if beyond 2025. The role of passive energy conservation through design and layout is not referred to. There is no reference to inclusion of solar panels, these being of less visual impact if designed into roof structures when residential units are built. Generally, future proofing is not identified as a strategy. There is limited evidence to substantiate how the proposals meet the Building for Life requirements; only brief statements are submitted effectively ‘ticking off’ the 12 points. The detail of the SUDS scheme is not shown where it may impact on the surrounding Green Belt or the principles of the landscaping layout or tree retention. The impact on water quality of the target watercourse is not shown and filtration or other mitigation is not indicated.
- 11. Heritage Statement** – Not submitted as an individual report or inclusion elsewhere. This is needed to deal with WHS inner setting relevance, any impact on the nearby Conservation Area, and as a contribution to understanding local distinctiveness. It also needs to address the failing in the assessments for the County Durham Plan that omitted the listed Police Mast on the Phase 1 site. This is relevant because though currently demolished it remains to be erected on a new site and will be potentially visible from parts of the proposed site.
- 12. Tree Reports and Plans** – A key omission is tree age, probable spread with age, and management needs to deal with conservation of the tree belts. The management of open space within the applicant’s control and forming the CDP allocation is not distinguished from surrounding open space and its management. The close packed layout setting units against developing tree blocks will lead to an inevitable clash in the future with householders over overhanging, shading and tree debris. Some garages and house units are particularly close to the tree blocks. Also missing from the suite of arboricultural and tree submissions is any understanding of the full implications of house and road construction on existing trees. There is a failure to fully estimate scaffolding and construction access around units and this is a common omission. There are no indications of future tree management principles or arrangements. The net result of this is that the full extent of initial and future management, including ongoing thinning and dealing with the relationship to the new houses, is missed. The full degree of tree loss, opening of views and ultimately biodiversity loss is not properly identified. That shown is substantial and, in reality, more is to be expected.

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- 13. Biodiversity Net Gain Assessment-** As a result of the missing or underestimated impacts of construction tree loss and subsequent management changes, the degree of biodiversity gain estimated cannot wholly be relied upon. The assessment is very limited and did not include specific on-site species checks or assessments of noise, activity, and lighting impacts. The general impact of new housing into a previously low usage area as part of an intrusion into the greenspace also needed analysis. This leads to a potential failure in the demonstration of net gain by failing to allow for construction and use impacts.
- 14. Design and Access Statement** -The submitted *Planning Policy Context 3.1* incorrectly refers to the Wear Valley Local Plan and notes the County Durham Plan (CDP) as emerging. The Durham City Neighbourhood Plan is missed and the CDP reference needs updating. The difference between the planning origins of this site and Phase 1 are missed, this being a site removed from the Green Belt. *Access and Movement 6.2* makes no reference to any pedestrian links outside of the site ownership. There is no reference to understanding the local area character or distinctiveness needed to inform the layout and design. Integration of the drainage strategy with site outflow attenuation and SUDS are not identified in principle, or otherwise, in relation to layout and landscaping. In sections *6 and 7, Site Masterplan and Design Principles*, there are no illustrations or explanations of how the masterplan evolved or its relationship to its surroundings. This is not clarified by any of the information submitted and available on the planning portal. Street views, 3D views and sections are essential to be able to illustrate the relationship of the development to the setting and other housing. There will be impact from the intrusion of this very prominent development.
- 15. Landscape and the Green Belt** – The CDP Policy 4, H4 requirement for a hedge ‘*to the perimeter of the site*’ needs explanation as this is not delivered by the landscape proposals. Ownership, adoption and future management are not shown in principle or detail. This leads to the ‘defining’ hedge, where proposed adjacent to the built areas, being set against a wooden fence outside of the householders' reach and lacking clear responsibility or even within the tree belt. There is therefore no clear and sustainable definition of the green belt. The CDP policy also required both infill of tree gaps and compensatory improvements to the Green Belt, neither of which is shown. The policy also required retention of the middle tree belt, but this is shown as being cut back and the full impact of the proposals is likely to be to erode it further than shown. Much greater analysis in detail of the Green Belt surrounding the proposed development is needed to enable both understanding of the impact of the development and where there are opportunities for mitigation as compensation for the overall loss of the original Green Belt area.

Proposals

- 16. Design** – As noted above, there is a need for adequate illustrations of the two enclaves and their cumulative relationship with the surrounding landscape and the housing areas nearby. This needed backing with explanations of design objectives and ways in which the proposals are locally distinctive. The submitted information shows a range of standardised house types arranged on a common cul de sac layout, maximising the number of units on the site. The house designs may have some adaptations but essentially remain like Phase 1 and

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probably other Persimmon developments. There is no evidence of relationship to surrounding development or why this should be required. No information is submitted to establish the local distinctiveness of the designs or their relationship to topography and the landscape of the green belt.

17. A key issue is the relationship of the units to their surroundings. Most units face each other across streets with little attempt to benefit from where a green outlook exists. This also leads to presentation of rear and side faces into the surrounding greenspace.
18. Trees are reduced to a role of backdrop to the housing. Information on the full relationship to surrounding areas and the design of the streetscape is not submitted. Were it not for the trees on the site, the view would be of two basic house clusters enclosed by a close board fence. As there is substantial underestimation of construction and management impacts on the developing tree belts, the reliance on screening value is unproven. The longer term problems of managing trees close to new housing resulting in tree loss next to the housing are not recognised.
19. The significance of the Green Belt setting and the unusual enclosure of the small development plots by it does not seem to have played a role in the design. The proposal appears to be dealt with as a simple extension to Phase 1 without noting the difference and its extremely sensitive position and context.

Impact

20. The site and former police training areas are already prominent in the landscape and therefore the Green Belt. Any development will be more prominent as it is seen across the valley and through gaps in the screening tree belts. This is an obvious consequence of omitting the site from the Green Belt to form an urban expansion area. Negative impact ensues from this and is a result of that decision. This is recognised to some extent in the compensatory requirements identified in principle in the County Durham Plan. In considering the detailed proposals careful analysis of the Green Belt context and landscape is needed to identify how the new housing units will impact on their surrounds.
21. The consequences of identifying this site for an expected yield of 50 units clearly place strain on minimising and mitigating against negative impact on the sensitive surroundings. The application adds a further 7 units and the pressure on the surrounding tree belt is clear. It is not uncommon for unit numbers and density identified in spatial plans to be more difficult to achieve in reality
22. The need to understand and respond to local character is identified in various policies applying to the site. The need for distinctiveness is clear. It is not found in the proposed layout and house unit design.
23. The layout is basic and composed of relatively standard house units. While of inoffensive design, they possess no distinctiveness and lack response to local character and context.

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The houses will protrude into the landscape and be prominent in views from the surrounding open space and houses that surround it.

- 24.** The site forms the boundary of the World Heritage Site inner setting and required attention to any impact development might have upon it. Here, its essential function is of landscape buffering on the inner city edge, placing emphasis on ensuring tree cover and needing high quality design to maintain its value. It helps contain the inner City and maintain perceptions of its small scale relative to the WHS core. There is weakening of the tree cover without explanation or analysis of compensatory planting. The design quality is not high, and the built enclaves are intensively developed. There is therefore negative impact.
- 25.** The value of the Green Belt is like that of the WHS inner setting area – separation and quality of ‘openness’ and quality of landscaping. There is negative impact contrary to the purpose of the Green Belt in separating areas of development and preserving the special character and setting of the historic City. Some impact is a consequence of the site’s inclusion in the CDP as an urban expansion area, but the degree and mitigation should be dealt with by the detail of proposals. In this instance they are not, and unnecessary negative impact ensues. In particular, the arm of the valley to the east is isolated from the of the green belt on the other side of the proposed development. Views from the opposite valley sides are also impacted negatively. There is no assessment of lighting impact and increased prominence of roads and houses resulting from it.
- 26. Sustainability** - The absence of any ‘stretch’ attainment against sustainability objectives leaves the development simply resting on reaching building control requirements. Its impact is to fail to ensure future proofing and to weaken the City and County’s response to the climate emergency and need to reduce carbon levels.

Transport -

- 27. Active Travel: local connections** - There is inadequate information provided regarding the dimensions and surfacing of proposed links to the surrounding network. The development is ideally situated to connect to a number of existing paths, offering walking and cycling routes to shops and particularly local primary schools which may be substantially shorter than the road alternatives. However, the application fails to take full advantage of this situation.
- 28.** From the southern of the two groups of houses a direct connection to the east, linking to the north-south pedestrian/cycle path, should be provided. This would help satisfy the Neighbourhood Plan’s Policy T1’s requirement for connections to surrounding paths and highways, and the similar requirements of CDP Policy 21(b). To protect the existing trees a “no-dig” mode of construction may be required.
- 29.** The application already proposes a link from the northern group of houses east to the existing path, but this is located and aligned awkwardly, probably to avoid the existing tree cover. It is important that paths are straight and visible to ensure social safety. Either a “no-dig” construction method should be employed to provide a more direct path from the end

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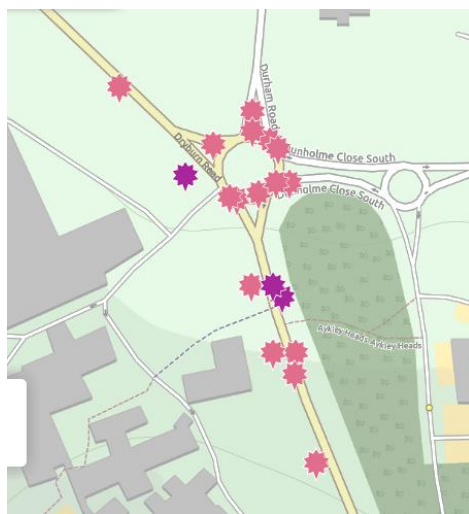
of the cul-de-sac, or the road should be realigned to reach the site boundary and lead end-on to a path through the existing gap.

30. Each of these connections to the existing pedestrian/cycle path should have a hard surface a minimum of 3m wide, designed for cycling and not just pedestrian use: the plans are unclear on this. The design should comply with LTN 1/20, in order to “have regard to the policies set out in the County Durham Strategic Cycling and Walking Delivery Plan” as required by Policy 21. This includes the need to ensure accessibility by non-standard cycles, particularly by avoiding the need for chicane barriers and other restrictions.

31. Active Travel: wider connections - The Transport Statement describes in some detail the road network connections and to a limited extent the pedestrian facilities. On the cycle facilities the analysis is poor. The Transport Statement is happy to point out that there is a traffic-free link with the NCN Route 14, forming connections “to Consett ... and to Hartlepool” (para. 2.25) but does not identify the many challenging road junctions in the immediate vicinity of the site which would face anyone attempting more realistic journeys. Junctions can be easily assessed using the LTN 1/20 junction assessment tool. The main access roundabout from the B6532 into the Aykley Heads site achieves a score of 0%.

32. Paragraph 4.244 of the Durham City Neighbourhood Plan refers developers to a map of cycling issues identified in preparation of the plan which can be used to help assess accessibility of the approach routes to a site. Consulting this map shows that, apart from the cycle path immediately to the east of the site, the rest of the network leading to local amenities (including the link to the city centre via Framwellgate Peth) is in need of improvement.

33. This assessment tallies with the Durham City Sustainable Transport Delivery Plan, which identifies the main roundabout junctions to the west as requiring improvement for cycling and walking access. Although the assessment of traffic collisions in the Transport Statement states in para. 2.29 that “there are no patterns or clusters of incidents that would raise concern” looking at the data over a longer timespan shows that there is clear clustering of collisions around the main access from the B6532 roundabout.



- 34.** A Section 106 contribution towards walking and cycling safety and priority measures at this roundabout, and along the length of the northern access road to the Aykley Heads site would be appropriate. Otherwise, the site will not be contributing to sustainable transport accessibility in accordance with NP Policy T1, nor will it meet the CDP Policy 21(a) requirement to deliver investment in safe sustainable modes of transport.
- 35.** The TRICS database estimates in Appendix 4 of the Transport Statement show just 2% of morning peak hour journeys would be by cycle, 17% on foot, and 2.4% by public transport. These estimates are at odds with the consultants' statement in paragraph 4.23 that the site is accessible by sustainable modes of transport. The government's aspiration is for a future where half of all journeys in towns and cities are walked or cycled (see *Gear Change: a bold vision for cycling and walking*, 27 July 2020, DfT). The DfT's Propensity to Cycle Tool estimates as much as a fifth of commuting journeys from Aykley Heads could be by bike or e-bike if a comprehensive safe network were available. The development proposals therefore fall far short of this aspiration.
- 36. Public Transport** – The Transport Statement demonstrates that the closest bus stops are 700m away on Bek road, and that a range of other bus services are available at stops between 800m and 900m distance from the site. These distances are significantly greater than the maximum distance of 400m stipulated in the *County Durham Parking and Accessibility Standards 2019* (para. 2.7.3).
- 37.** The Planning Statement declares in para. 4.55 that “the site is severed [sic] by public transport” but the Transport Statement demonstrates that the site is effectively not served by public transport in any meaningful way. The Trust has raised concerns to this effect in responses to other Aykley Heads planning applications, including DM/20/01846/FPA. Despite the site's location within the city boundary, the public transport accessibility of the depths of the site can only be improved by provision of services which penetrate the site.
- 38.** The informal path connection to Flambard Road would actually provide walking access to bus stops only 500m distant. CDP Policy 21 requires provision of “appropriate, well designed, permeable and direct routes for walking, cycling and bus access”, while CDP Policy 4 identifies a requirement for new and improved footpaths to the north and west of the site. The Trust suggests that upgrading the paths to Flambard Road to provide a 3m wide suitably graded walking and cycling link would help achieve the levels of public transport access expected by CDP Policy 21.
- 39.** Lighting would need to be considered to make this path attractive to all potential users. While this would intrude into the Green Belt land, it is inevitable that residential development will have an urbanising impact on the surrounding land, and the key consideration is to ensure good design, including limiting the spillage of light. The principle

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has already been accepted with the shared pedestrian/cycle path running northwards along the eastern site boundary already being lit.

- 40.** Other low-cost mitigations to improve the public transport access could include providing cycle parking at bus stops in the area, helping to bring those bus stops within a reasonable travel time of the proposed housing.
- 41. Reducing the need for car ownership** – With a site which is poor for public transport accessibility there is likely to be greater car dependence. This can be addressed by providing and promoting a car club scheme, as encouraged by NP Policy T2(e). The developer offers no evidence that this has been considered.
- 42. Path network** - The paths which the Trust considers are needed to provide adequate walking and cycle links are summarised in the following plan. If the developer's proposal for the alignment of the link from the northern group of houses is preferred, then the group of houses circled in purple should be reoriented to overlook the path to improve social safety.



Policies

- 43.** The proposals fail against Planning Policies as follows:

County Durham Plan:

Policy 4 Housing Allocations

Table 7 Housing Allocations

Development Requirements 4/DU/93

- Failure to provide a workable, complete new Green Belt boundary in the form of a native species hedge to the perimeter of the site.
- Failure to analyse and detail management and fully retain the existing tree belt within the middle of the site and provide additional tree planting in gaps within the tree belts to the north, east and south-east of the site.
- Failure to analyse and detail compensatory improvements to remaining Green Belt in the vicinity.

Policy 20 Green Belt

Failure to assess and mitigate impact on surrounding Green Belt contrary to NPPF Para. 144. Approving this application in its current form would fail because of lack of information on impact and mitigation and therefore fail to ensure that substantial weight is given to any harm to the (*surrounding*) Green Belt. Approval as a housing allocation does not remove the duty to understand harm to the Green Belt under 'openness' and 'separation' in order to show that the development minimises these impacts.

Policy 21 Delivering Sustainable Transport

Failure to address sustainable transport properly, with little being done to address the inaccessibility of the site by public transport.

- a. Little investment in sustainable modes other than path connections. Public transport access very poor.
- b. Cycling not explicitly enabled via the path network, and widths probably inadequate. Some path proposals poor in design or only appropriate for leisure use. No bus access.
- c. No evidence as to severity of congestion caused by development. Existing peak-time congestion around Trinity School not acknowledged or addressed in Transport Statement.

Policy 22 Durham City Sustainable Transport

Does not support delivery of measures identified in Durham City Sustainable Transport Delivery Plan, such as walking and cycling improvements linking Aykley Heads to neighbouring areas.

Policy 29 Sustainable Design

Failure generally to ensure that the development proposals will achieve well designed buildings and place.

- a. Failure to contribute positively to an area's character, identity, heritage significance, townscape and landscape features, and help to create and reinforce a locally distinctive and sustainable community.
- c. Failure to demonstrate minimisation of greenhouse gas emissions, to achieve zero carbon buildings and providing renewable and low carbon energy generation,

Landscape proposals fail to:

- g. Respond creatively to topography and to existing features of landscape or heritage interest and wildlife habitats.

- h. Respect and where appropriate take opportunities to create attractive views of and from the site.
- i. Reflect in the detailed design any features characteristic of the locality such as boundaries, paving materials and plant species.
- j. (*To fully*) create opportunities for wildlife including through the use of locally native species.
- k. Make appropriate provision for maintenance and long term management; and
- l. *Ensure that the edge of settlement development* will provide for an appropriate level of structural landscaping to screen or assimilate the development into its surroundings and provide an attractive new settlement boundary.

Policy 39 Landscape

The proposals, as submitted, will fail to ensure minimal harm to the character, quality, and distinctiveness of the landscape. They fail to incorporate appropriate measures to mitigate adverse landscape and visual effects.

The proposals adjoin an Area of Higher Landscape Value (AHLV) and do not include sufficient conservation and enhancement of the special qualities of the landscape.

Policy 40, Trees, Woodlands and Hedges, Trees

The proposals will result in the loss and damage of trees of high landscape, amenity, and biodiversity value.

The proposals fail to fully retain existing trees that make a positive contribution to the locality and the development. There is a failure to ensure adequate stand-off distances between retained trees and the new development and to integrate them fully into the design and ensure their future management requirements allowing for growth potential.

There is a failure to show suitable replacement planting, including appropriate provision for maintenance and management.

Durham City Neighbourhood Plan

Policy S1: Sustainable Development Requirements of all Development:

The development proposals fail to demonstrate the following principles by:

- c) Not harmonising with its context in terms of scale, layout, density, massing, height, materials, colour, and hard and soft landscaping.
- d) Not conserving the significance of the setting, character, local distinctiveness, important views, tranquillity and the contribution made to the sense of place by Our Neighbourhood's designated and non-designated heritage assets.
- e) Not adequately Protecting and enhancing the diversity of Our Neighbourhood's natural environment in terms of biodiversity / geodiversity, designated wildlife sites and seeking biodiversity net gain wherever possible.

Failure to ensure fully the responsible use of resources and increase in resilience to climate change by not:

- g) Efficiently incorporating use of local and renewable building materials through sensitive design, layout, density, and orientation.
- h) Fully minimising energy consumption and carbon emissions,
- k) Detailing the incorporation of the sustainable urban drainage system (SUDS) to achieve improvements in water quality, aquatic ecosystems, and habitats in order to increase resilience to climate change.

Policy H1: Protection and Enhancement of the World Heritage Site

Failure of development proposals fail to demonstrate that they to sustain, conserve and enhance the setting of the World Heritage Site where appropriate by:

- e) carrying out an assessment of how the development will affect the setting of the World Heritage Site.

Policy H3: Our Neighbourhood Outside the Conservation Areas

The development proposals fail to demonstrate an understanding of the area of the proposed development and its relationship to Our Neighbourhood as a whole.

The development proposals outside of the Conservation Area do not take into account or meet the following requirements, by:

- a) Failing to sustain or make a positive contribution to the character and distinctiveness of the area; and
- c) Failing to use high quality design which contributes to the quality and character of the area.
- d) Failing to have scale, density, massing, form, layout, landscaping appropriate to the context and setting of the area.
- e) using materials and finishes appropriate to the context and setting of the area.

Policy G1: Protecting and Enhancing Green and Blue Infrastructure

Enhancing green and blue assets

The development proposals fail to have regard to the local distinctiveness, character, quality and biodiversity of public rights of way and other footpaths.

Protecting and enhancing green corridors

The development proposals fail to demonstrate that impact on the adjacent green corridor will maintain or enhance their functionality and connectivity and avoid significant harm to ecological connectivity.

Enhancing biodiversity

The development proposals fail to adequately demonstrate that they provide net gains for biodiversity by restoring, recreating or creating wildlife habitats, particularly for locally protected and priority species.

Policy D4: Building Housing to the Highest Standards

As new housing proposals they fail to be of high quality design relating to:

- a) the character and appearance of the local area.
- c) external form and layout.
- g) the improvement of energy efficiency and the reduction of carbon dioxide emissions.

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There is a failure to demonstrate how the new residential development will meet the Building for Life 12 standards provided for in County Durham Building for Life Supplementary Planning Document (2019).

Policy T1: Sustainable Transport Accessibility and Design

The development proposal is supported by little evidence as to how it contributes to sustainable transport accessibility.

The accessibility of the approaches to the site have not been demonstrated, and the proposals to improve access have not taken full advantage of the potential for links to the surrounding network.

The proposals do not address the requirement for a “family-friendly environment in a high quality public realm” or for “opportunities for play in residential streets, and a safe environment at day and night”. Doing so might have led the designers to a different disposition of car parking spaces to create better space for children.

Policy T2: Residential Car Parking

While on-street parking is provided in designated bays, the application does not address clause “e” by providing car club spaces.

Policy T3: Residential Storage for Cycles and Mobility Aids

While secure cycle parking is promised for all dwellings, no statement is made as to whether the storage would be adaptable to other mobility aids, nor whether electric power would be available to allow charging of e-bikes and powered mobility aids. No information is provided as to the design or location of the proposed storage, and therefore compliance with Policy T3 cannot be assessed.

Objection

19. The Trust objects to the application because of its significant failures against County Durham Plan and Durham City Neighbourhood Plan policies.

Yours sincerely

John Lowe,
Chair, City of Durham Trust