THE CITY OF DURHAM TRUST

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11 February 2023

Mr Graham Blakey
Planning Development Central/East
Room 4/86-102
County Hall
Durham City
DH1 5UL

Dear Mr Blakey,

DM/22/03778/FPA: Hybrid planning application consisting of outline planning permission (all matters reserved) for an extension to the Sniperley Park and Ride, and full planning permission for the development of 368 dwellings, associated access and works, and demolition of former farm buildings (resubmission).

Thank you for the opportunity to comment on the above application. The City of Durham Trust was closely involved in the emergence of Sniperley Park as Site H5 in the approved County Durham Plan and especially in the independently examined and modified wording of Policy 5. For the avoidance of any doubt, the Trust fully supports the approved County Durham Plan's policies relating to the Sniperley Park housing allocation. It looks to the County Council to uphold those and all the other relevant policies of the County Durham Plan and the National Planning Policy Framework. Accordingly, the Trust welcomes the County Council's forthright refusal on multiple grounds of the preceding application DM/21/02360/FPA.

The City of Durham Trust warmly welcomed the opportunity to comment on the County Council's Consultation Draft Masterplan for Sniperley Park (CDP Site H5) and the associated Healthy Active Travel Connectivity Plan. We made hopefully constructive comments on both documents. Although the DCC Adopted Masterplan largely disregarded our suggestions we nevertheless hold that planning applications for site H5 must at least meet the requirements of National and County Durham Plan policies as expressed in the County Council's Adopted Masterplan and Healthy Active Travel Connectivity Plan.

The Trust acknowledges that the applicant has made some improvements from the preceding application but considers that the following matters constitute grounds for refusal of this application as failing the specific requirements laid down in CDP Policies, notably Policy 5.

Our comments are extensive, but this is necessary in the light of the huge amount of information submitted with this planning application.

Policy 5: Comprehensive masterplan for Sniperley Park

The applicant submits a Masterplan that covers the whole of Site H5 but this fails to comply with several parts of CDP Policy 5 and the County Council's Adopted Masterplan, as follows.

Number of dwellings

Policy 5 states unequivocally that "***Development will comprise 1,700 houses at Sniperley Park***". This is not a range of numbers or a whimsical indicative figure, it is a firmly prescribed quantity relating to all of the factors in play, including the capacity of the surrounding infrastructure. Yet the submitted Masterplan proposes 1,918 houses - 13% over the Policy 5 figure. This has consequences for traffic generation and has contributed to various design issues which we detail later.

Access and site for local centre

The applicants' joint Submitted Masterplan differs from the DCC Adopted Masterplan in three significant respects:

- location of the A167 roundabout to link to the B6532 from the north
- location of the local centre
- alignment of the B6532 link to the Park and Ride roundabouts, which also provides a link to the Bellway site

While these are all on the County Durham Land-controlled part of the H5 allocation, the placing of the local centre, in particular, has a strong bearing on the design and layout of the Bellway part of the allocation. This must be resolved prior to any granting of full planning permission.

A full discussion of the merits of each layout will be found in the Trust's response to the County Durham Land application, DM/22/03712/OUT.

The County Durham Land outline application reserves all matters apart from access, and only includes detailed designs for the junctions and crossings on the A167 and Potterhouse Lane. Those on the B6532 have not been submitted in final form. It appears that the alignment of the link road between the County Durham Land and Bellway sites, and the location of the local centre, are not among the key matters to be settled in granting permission for DM/22/03712/OUT.

If the local centre is placed on the Sacriston side of the electricity transmission line, in accord with the DCC Adopted Masterplan, the Bellway plans will require changes to provide the full complement of active travel connections, supporting cycling as well as walking, to match those indicated in the DCC Adopted Masterplan. The Trust would like to see Bellway's full compliance with the DCC Masterplan layout because doing so would ensure that the development has good connections to the County Durham Land part of the allocation no matter which location is finally chosen for the local centre.

Requirement (a) Sustainable urban extension

Principle 10 of the Adopted Masterplan is:

> "*Design a sensitive movement network that promotes active travel over the use of cars and fits with the landscape.*"

The unexceptional suburban layout proposed by Bellway does not comply with this principle. Note that the County Council's Adopted Masterplan does not just require promotion of active travel, but promotion of active travel **over the use of cars**. This is of critical importance. DCC's Climate Emergency Response Plan 2 identifies an interim target for the end of 2023 of reducing fossil fuel vehicles on the road by 35,000 or a 25% reduction in vehicle miles[1]. A recent academic report[2] opens its summary with the following words:

> "*Reducing car use and ownership is necessary for decarbonising the UK economy. There are no plausible pathways to get to net-zero by 2050 unless the number of cars reduces*."

Considerable weight, therefore, must be given to whether the application will succeed in promoting active travel over the use of cars. The Trust considers that it fails in this regard.

The Adopted Masterplan indicates areas of development and the expectation for the main access roads and path network. It does not stipulate street-level layout and gives designers much freedom regarding built form and density. However, there are several important requirements of the Adopted Masterplan that have not been observed by the Bellway application, which has not been significantly redesigned from the previous submission, despite the adoption of the DCC Masterplan. The following excerpt is from pages 32-33 of the Adopted Masterplan:

1 Climate Change Strategy & Climate Emergency Response Plan, 2022-2024, Durham County Council. p.6
2 Morgan, M., Morton, C., Monsuur, F., Lovelace, R. & Heinen, E. 2022. Understanding Change in Car Use over Time (UnCCUT): End of Project Report. Leeds: DecarboN8.

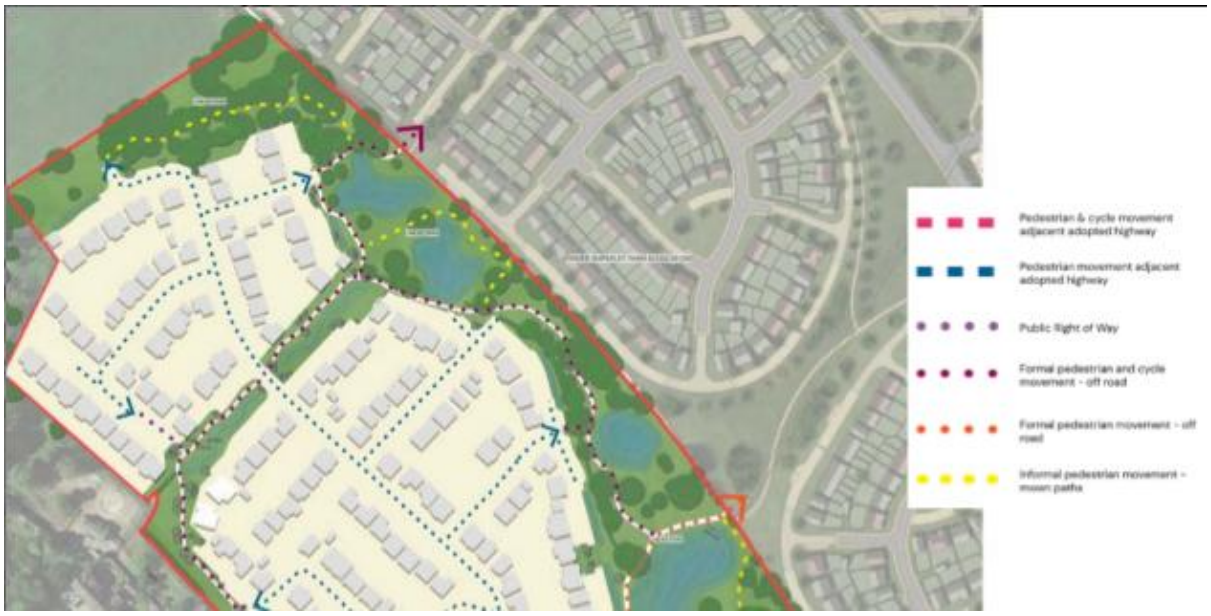
Note that there are at least four connections between the two sites, all of them direct and aimed at key features such as the local centre and the primary school. Feature 3 is a secondary focal point, on the alignment of feature 4, the “Sniperley Hall Street”, a “pedestrian and cycle street linking the local centre and Sniperley Hall”. The Adopted Masterplan also indicates linear park areas parallel to Sniperley Hall Street, one to the SE under the power lines, and one to the NW, as well as the link road (feature 10).

In the Bellway layout, shown below in the Adoptable Highways Plan, somewhat narrower park areas are provided, but the Sniperley Hall Street in between, with its community focal point on the access road, is omitted. The only cycle link shown (in purple) is near the power lines. In the Adoptable Highways Plan the link at the northern end of the site is just for pedestrians.

Page 97 of the Design and Access Statement (see excerpt on the next page) shows the link at the northern end as a cycle route but the path near the power lines is this time pedestrian only. The Adopted Masterplan requires a coherent layout across the whole site, interconnected by direct and legible cycling and walking routes.

The following excerpt of p. 97 of the Design and Access Statement (2nd. PDF, p. 22) indicates the layout of the neighbouring County Durham Land site, and demonstrates the lack of connections between the two. The link road and a path under the power lines are provided, but the Adopted Masterplan's two links to the local centre further north have been reduced to one, which may not be suitable for cycling and is not readily accessible except from a small number of houses. While the Bellway proposal has a section of linear park to the north, the alignment is disrupted by the SUDS ponds and misaligned with the County Durham Land layout. There is no cycling/walking link midway between the other two links, envisaged as a prominent “Sniperley Hall Street” in the adopted Masterplan.

These design failings lay bare the methodology behind the Bellway design, which has been to lay out the road network, and fit the paths around the resulting housing. The DCC Adopted Masterplan quite rightly expects a pedestrian and cycle network which takes priority over the road network, and which is designed to attract people to use it both for local and longer utility journeys.



Even within the site, Bellway's path network is not legible or coherent, but incomplete and in places quite indirect. Note particularly in the Adopted Masterplan the generally straight link from the A691 through to the linear park and the primary school (points 5, 6, 13 and 14 on the Masterplan diagram) compared with the Bellway proposal which twists and turns alongside the main access road. This does not deliver features 6, “mature and welcoming green gateway to west” or 5 “main western connection … facilitating connections for pedestrians”.

The A691 bus stops are to be separated by about 140m but as is clear from the following excerpt from the Bellway plans, paths do not connect direct from the development and all pedestrian access is via the road:

The Bellway proposal clearly fails to deliver on a key Masterplan requirement. Further evidence of objections to the layout and sustainable transport network is given in the appendix.

Requirement (d) SUDS scheme

The submitted plans and information show substantial areas of SUDS drainage basins, including within the linear park. Detail of their actual performance in relation to persisting ground conditions or periods of anticipated water retention is not available. A SUDS scheme has to have deep enough ponds to hold the water and avoid the surroundings getting too wet. The landscape plan assumes they will be wet grassland. They are unusable parts of the landscaping and great care will be required in their management to fulfil their potential.

Requirement (e) design of development in the vicinity of Sniperley Hall and Farm will have regard to their character and setting

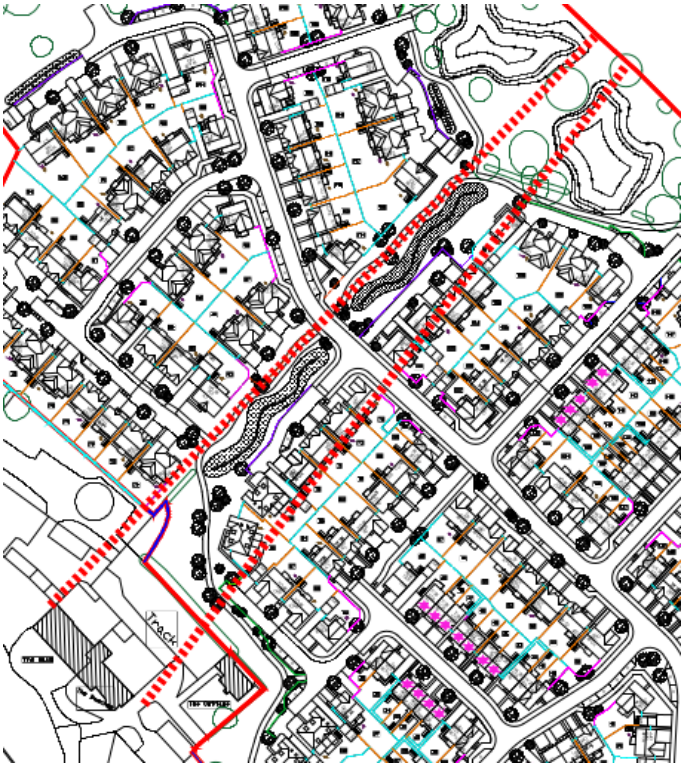
The way in which the farm conversion (the subject of a separate application) is designed needs to achieve full integration with the neighbouring character area in this main Bellway Homes Ltd application. This must ensure that the design of the houses in the vicinity of the farm is appropriate and that they form a suitable character area. The Trust will be pleased to see the farm buildings appropriately restored and modernised to provide good quality residential accommodation, but this redevelopment must be coherent with the main housing provision in keeping with the DCC Masterplan.

The layout of the housing immediately to the north of the Hall, where eight houses back onto the historic parkland with 1.8m close boarded fences, does not seem to have regard to the character or setting of the Hall. The housing density may be reduced slightly compared to the rest of the development, but only by providing more substantial private gardens. This falls substantially below the design quality expected by the policy.

Requirement (g) – linear park … maintaining the relationship of the Hall with land to the north and with Sniperley Farm …

The DCC Adopted Masterplan p. 34-35 (Landscape and Green Infrastructure) includes a broad and straight section of linear park labelled “The Avenue” providing a vista north-east from the Hall as far as the B6532. On p.37 the DCC Masterplan shows an aerial image outlining the scope of the vista, which extends the full width of the Hall.

The joint Submitted Masterplan by the applicants shows a much narrower strip of parkland which is not in alignment across the site boundaries, with a somewhat indirect path layout. The following image demonstrates the extent to which Bellway's proposal impinges on the vista envisaged in the DCC Masterplan, with a row of houses blocking a substantial part of the view:



Requirement (h) compensatory Green Belt improvements

The policy requires “new public rights of way linking to the wider footpath network in the Browney Valley to the south” but the applicant's proposals do not include any. There should be at least one footpath from the development, crossing the A691 and connecting through the compensatory improvement land to Witton Gilbert Footpath 12.

Requirement (i) district heating and Policy 29 sustainable design

The Trust accepts the conclusions of the authoritative Wardell Armstrong report submitted with the County Durham Land LLP application which investigates the possibilities for mine water as a heat source and concludes that ground-source heat pumps coupled to solar panels are the most effective and efficient sources of renewable energy for this site. The Trust endorses the more detailed submission on this matter from the City of Durham Parish Council.

In complete contrast, the Bellway Homes application offers gas boilers, with alternatives relegated to an unclear number of designated Future Homes. Alternative provision remains in the realm of research and consultation when the need is much more immediate.

Gas boilers are to be prohibited for new developments within two years (2025) and banned completely within 12 years (2035). The ban may impact on this development within its build-out period and certainly within the expected lifespan of the housing. Retrofitting of alternative heating is substantially more expensive than incorporating it when built: heat pump systems

may require larger pipes and radiators, and require hot water cylinders, so cannot be used as direct replacements for gas combi-boilers.

There is no ambiguity on this point. The DCC Adopted Masterplan states on page 7: "*The Sniperley development provides an opportunity to show what can be achieved through good sustainable planning, by ensuring there is* ***no connection to the gas network*** (our emphasis***),*** *instead heating homes through Passivhaus principles, individual Air/Ground Source Heat pumps or district heating*;" The City of Durham Trust is in complete agreement with this principle and deplores the Bellway application for its regressive position on the climate emergency.

The Sustainability Checklist states that “passive” electric vehicle charging points only are to be installed at every house and visitor space. The DCC draft Parking and Accessibility SPD requires an active charging point at each dwelling. In the Sustainability Checklist the applicant has proposed installation of 74.4 kW capacity of photovoltaic panels, generating 63.9MWh per year, and states this would account for 2.4% of the site's energy requirements. This provision works out at less than one panel per house! Part 3(b) states that “all of the homes will feature roof integrated solar PV arrays capable of generating 63.9MWh/year of electricity”. The figure cannot be the amount generated per house. A typical 14-panel PV array in Durham City is known to have generated 27.7MWh over ten years, or 2.7MWh per year. Nor can the figure be the total amount generated across the development: an annual yield of 63.8MWh is what you might expect from 24 houses, rather than the 368 proposed.

Optimising building sustainability entails careful alignment of buildings to take advantage of solar gain and optimise solar panel orientation. The new Building Regulations Part O also requires house-builders to limit solar gain in summer to avoid overheating. The Sustainability Checklist asks developers about the orientation of the main living areas of homes, and whether a thermal comfort/overheating assessment has been performed.

The applicant claims that 42% of houses will be oriented in a southerly direction. Looking at the proposed layouts it is clear that the vast majority of houses are oriented with their corners pointing directly to the compass points, and thus have one of their windowless side walls facing either SW or SE. The main access roads are aligned SE to NW and so many houses will receive no solar gain through windows until the afternoon. This might be an advantage in hot summers, but will not help reduce heating bills. The applicant has not answered the question about the thermal comfort/overheating assessment.

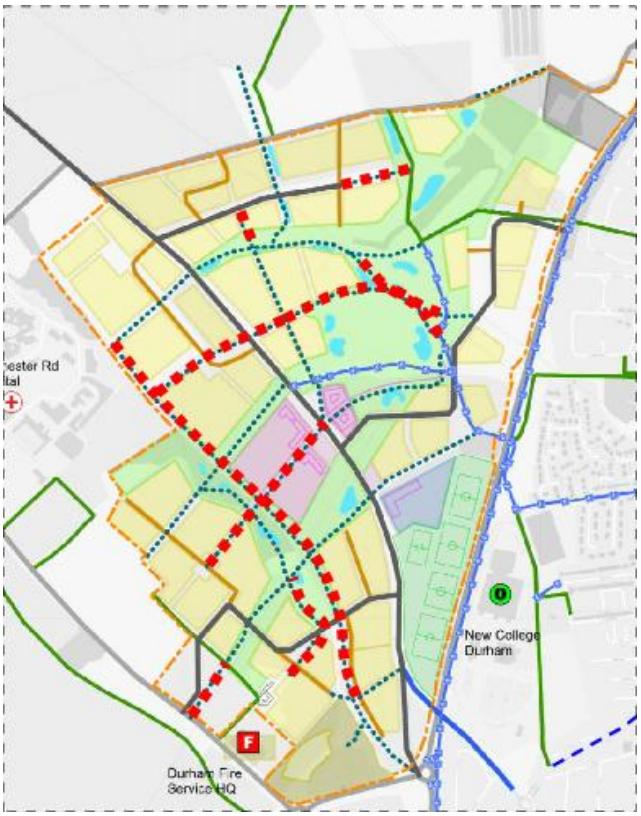
Overall, the Trust considers that the application does not meet the requirement of Policy 29(c) to “minimise greenhouse gas emissions”.

Thus, the application falls chronically short of the aim of net-zero development. The award-winning scheme by the City of York for a 600-house net-zero project should be the inspiration here: healthy homes and neighbourhoods, distinctive and beautiful places, supporting sustainable travel and low environmental impact. Indeed, this is exactly what the Government’s proposed updating of the National Planning Policy Framework is about.

Requirement (j) connected … to the east of the A167 through suitable, convenient, safe and attractive cycleways and footpaths

The Design and Access Statement p. 130 (p. 55 of the second PDF) assesses Policy 5(j) as "not applicable" to the Bellway application. This is clearly not correct, as even though the Bellway site does not border on the A167, there are on and off-site provisions which will need to be made.

The DCC Adopted Masterplan page 41 refers to the Healthy and Active Travel Connectivity Plan (HATCP) for the routes to be implemented. The following excerpt from the HATCP shows the existing and proposed on-site route network, overlaid with red dashed lines to indicate the parts of the HATCP network which have been omitted from the joint masterplan submitted by the applicants. Some paths may have slightly different positioning because of the differing main road alignments between the Submitted Masterplan and DCC's Adopted Masterplan. The differing location of the local centre between the rival Masterplans also complicates the analysis.



It can be seen that the applicants' proposed network offers much less dense connectivity, and is less accommodating of changes that might result from reserved matters applications within the County Durham Land portion.

The HATCP also details interventions which will be required in order to connect to the existing neighbourhoods east of the A167. Helpfully the applicant has included minutes of a meeting of Bellway, CDL and DCC in November 2022 as Appendix 19 (p. 254) of the Transport Assessment and Travel Plan.

The Trust welcomes the funding of cycling and walking improvements at the Sniperley roundabout, but objects to there being no proposal to improve cycling and walking crossings at

the A691 Park and Ride roundabout, despite this being on the route from the development to the communities east of the A167.

The Trust is disappointed to see no requirement for improving the cycling and walking provision on the A167 to Durham Johnston School. Even if the majority of young people will be attending Framwellgate Moor School, enhancing the A167 route has the potential to enable a modal shift from car to active travel on this route, and thereby reduce the impact of additional vehicular traffic generated by the Sniperley development.

Requirement (k) links between the housing and the Park and Ride

As can be seen in the diagram above, the DCC adopted Masterplan envisaged a clear and direct cycle and pedestrian link along the boundary between the Bellway and County Durham Land sites. This has been omitted from the applicants' joint masterplan and appears in neither application.

A link to the Park and Ride wholly within the Bellway site is also proposed. There are many aspects of the detailed design which fail to comply with national design guidance (see appendix) and thus fail the policy requirement for "*attractive and safe links*".

Requirement (l) impacts on highway and the wider road network

> ***"(l). To ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider road network (in terms of capacity and congestion), details of all necessary on- and off-site highway works and improvements, together with a timetable for their implementation, shall be agreed with the Council as part of the comprehensive masterplan and any future planning applications for the Sniperley Park site. These works and improvements shall include, but not be limited to:***
> - ***improvements at the junctions of Trout's Lane, Potterhouse Lane and the B6532;***
> - ***a new link between the B6532 and the A167 park and ride roundabout; and***
> - ***capacity improvements along the A167 corridor from Neville's Cross to Sniperley, including improvements to Sniperley Roundabout.***
>
> ***A contribution to delivering sustainable transport in accordance with policies 21 (Delivering Sustainable Travel) and 22 (Durham City Transport) will also be required."***

The applicant's Submitted Masterplan proposes 1,918 houses. Much focus was placed in the Examination in Public on the capacity of the road network to cope with the 1,700 houses proposed by the County Council; indeed, the position taken by the County Council was that a Western Relief Road was needed if more than 350 houses were built at Sniperley. The Inspector in his Final Report dismissed this proposition, deleted reference to the relief roads, and instead included "*other requirements that are necessary to ensure safe and suitable access to the Sniperley Park site and that the residual cumulative impacts on the wider road network are not severe*." He carried this through into Policy 5 requirement (l).

It falls to the County Council to finalise whatever set of measures will be needed to ensure that 1,700 houses at Sniperley Park will not cause severe cumulative impacts on the wider road network. Such measures should include up-to-date travel plans for the Johnston School and the other schools that cause vehicular traffic on the A167 and could entail measures such as

access restrictions on Redhills Lane and a safe walking/cycling route from Bearpark. The risk of severe impacts would be made all the worse if the two current planning applications were to succeed and 1,918 houses were built at Sniperley.

Policy 21 Sustainable transport

We provide here a summary of the Trust's objections. Detailed analysis and justification with respect to local and national policy and guidance is attached in the appendix.

To start with a positive, inclusion of a single car club parking space is an improvement over no provision. This however is perhaps a token gesture, rather than a carefully evidenced provision.

A recent report from Transport for New Homes has highlighted that nationwide the transport outcomes for most major housing developments are very poor.[3] The application makes many of the same mistakes, and shows little sign of living up to the County Durham Plan vision of a "sustainable urban extension":

- The applicant's Transport Assessment and Environmental Statement contain several incorrect or misleading statements in relation to the sustainable transport accessibility of the site. They downplay the need for off-site improvements to enable sustainable transport. The Trust considers they should be afforded little weight in assessing compliance with planning policies.
- The application does not "give priority first to pedestrian and cycle movements" (NPPF para. 112) or incorporate "convenient, safe and high quality … pedestrian and cycle routes" (CDP Policy 5).
- In the design of pedestrian and cycle access within the site, several aspects of the application do not have regard to the policies of the County Durham Strategic Cycling and Walking Delivery Plan (CDP Policy 21) nor does the design reflect current national guidance (NPPF para. 110c).
- It is not clear which routes will be accessible to cyclists: the submitted documents are contradictory and allow at least four different interpretations. Good cycle access is key to delivering sustainable travel options as the Transport Assessment demonstrates that most amenities are beyond the 2km walking distance.
- The arrangements for car parking are inflexible and wasteful of land, and thereby do not reflect current national guidance including the National Design Guide and the National Model Design Code (NPPF para. 110c) or realise opportunities for net environmental gains (NPPF para. 104).
- It is stated that cycle storage for house types without garages is to be provided via garden sheds, which are more vulnerable to theft than purpose-built storage.
- The development misses an opportunity to provide no-car or low-car housing coupled with overnight use of the Park and Ride car park for residential use. Only a single car club space is envisaged. Reducing the in-curtilage provision of car parking and greater

3 *Building car dependency: the tarmac suburbs of the future.* (Transport for new Homes, 2022). https://www.transportfornewhomes.org.uk/the-project/building-car-dependency/

encouragement of shared ownership would help support the requirements of the Building for Life SPD paragraphs 4.1-4.5 and 11.5.

- Space for internal bus stops (e.g. shelters and minimum 3m width footway) has not been allocated on the link road from the A691 to the B6532.
- There is no proposal for a safe crossing of the A691 to access the westbound bus stop.
- The developer's proposals for cycling/walking links to Framwellgate Moor School are welcomed, but without addressing the crossing of the Blackie Boy roundabout they will have limited impact. Various design details could be improved.
- Without cycling and walking interventions on routes towards the city centre (e.g. Aykley Heads) key "opportunities to promote walking, cycling and public transport" have not been "identified and pursued" (NPPF paragraph 104)
- The Travel Plan target for car trip reduction is not ambitious enough, with the initial target substantially exceeding the car trip rates for neighbouring Framwellgate Moor. The measures proposed for encouraging sustainable travel are inadequate. The Trust's evidence in the appendix suggests an initial car driver target of 66% reducing to 63% over five years.

The Trust was disappointed that in the case of the Bent House Lane application DM/20/03558/OUT (which is the other site covered by County Durham Plan Policy 5), the planning officer's report to the Committee gave only a very brief summary of the Trust's objection and gave no indication of the detailed evidence which backed up our submission. Sustainable transport issues barely featured in the committee report, and were only partially addressed by the Highways and Sustainable Transport internal consultees. Compliance with the sustainable transport policies of the County Durham Plan was not actually demonstrated.

The Trust wrote to the County Council on 3 December 2021 detailing these concerns, and expects that the committee report for the current application will give full weight to sustainable transport.

Policy 29 Design

The newly submitted plans remain firmly rooted in standard volume house-builders' layouts and house types.

The DCC Adopted Masterplan envisages a wider range of layouts and house types, with more use of denser forms such as terraces and apartments allowing greater freedom in disposition of green space, car parking and the path network. Exceeding the Policy 5 figure of 1,700 homes has also affected the design quality. This has led to some of the failures in policy compliance already mentioned, including:

- orientation of houses to optimise thermal comfort and solar PV;
- lack of legibility, priority and directness for the path network;
- car parking provision which is inefficient in land take and "locks in" parking use when a move to lower car ownership is required;
- poor handling of the setting for Sniperley Hall, and the narrowness of the linear park provision.

When other built forms have been deployed, these have not been to best advantage. The apartment blocks, with no private green space, are clustered together overlooking the Park and

Ride car park. While proximity to the Park and Ride may advantage households without a car, a better balance could have been achieved by siting the apartments adjacent to the parkland and with better access to the on-site amenities such as the future school and local centre.

The design code is little more than a delineation of 'character' areas and associated finishes. There is no analysis of how those areas and finishes have evolved. It reads as a retrospective description and not an active design document.

There is no credible attempt to show in what way the proposed units are related to Durham City and its setting and in what way they are distinctive in design. Identifying local later 20th-century houses offers no guide to local distinctiveness. The tight packing of units, and predominantly built and paved street frontages are going to be very similar to many other County developments and those found throughout England.

As an example, there are three specific areas of design.

1. Sniperley Farm remains omitted from this application and is covered by an isolated and separate application. The amended plans offer no clear and positive design relationship to the farm and could have generated an obviously distinctive character area. That shown only offers some materials changes on the standard house types.
2. The site vision offered 'verdant tree-lined avenues'. While there is some street tree planting, this is weakened by the number and clustering of the off street parking bays – resulting in long stretches of hard landscape and car parked frontage. Most street planting is in private front garden areas and its success and retention will be completely dependent on the care and attitude of the house-owner. The reality is far from the 'verdant' vision shown in the Design and Access statement incorporating the Design Code.
3. The setting to Sniperley Hall is basic in concept and fails to positively enhance either the Hall or the new development. The partial open space buffer is minimal with no screening other than a new hedgerow, and the remainder of the boundary area is formed from relatively small rear gardens.

The open spaces clustered round the access road from the A691 remain unattractive for use due to proximity to the roads and isolation at the edge of the site. As an example, this would have offered opportunities for creating distinctiveness and unique site character.

Conclusions

The revised application does not offer sufficient improvements compared to the original submission which the Council was minded to reject. Basic design and sustainability failures remain embedded in the approach chosen. For all the reasons set out above, the Trust considers that this application must be refused.

Yours sincerely

John Lowe,
Chair, City of Durham Trust

APPENDIX ON THE TRANSPORT ASPECTS OF THE BELLWAY APPLICATION

The following sections substantiate the Trust's objection with detailed examples from the various application documents and references to local and national planning policy and design guidance.

Pedestrian and cycle network within the site

General layout and priority

NPPF paragraph 112 requires that developments "give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas". CDP Policy 5 requires the incorporation of "convenient, safe and high quality bus, pedestrian and cycle routes within, and also connecting to adjoining facilities". The Masterplan principle 10 requires "a sensitive movement network that promotes active travel over the use of cars". The Sniperley Health Active Travel Connectivity Plan lists a number of Key Design Principles (KDP) which should be observed by the application.

Giving priority to pedestrian and cycle movements should entail:

- designing the development around a core active travel network which is attractive and direct;
- where possible giving pedestrians and cyclists priority over motor vehicles, e.g. at crossings.

The impression given by the Adoptable Highways Layout, which includes details of the path network, is that the design prioritises motor traffic access to the site. This is contrary to NPPF paragraph 112. Footways are provided along access roads, but are not continuous across side roads (which could have provided "priority first to pedestrian movements"), and often cease partway along each cul-de-sac, even when the route links to connections to the external path network. The adoptable cyclepath reaches less than half the site and is indirect. It also has no priority at the many places where it crosses side roads, meaning that cycling might actually be safer and more convenient on the access road itself.

By contrast the Council's adopted Masterplan shows a more comprehensive and coherent cycle and walking network. The B6532, coloured red and yellow, runs NW to S through this excerpt. A direct path to the Park and Ride / A167 roundabout is shown running along the boundary between the Bellway and CDL sections of the site. It is not clear from the Bellway application whether either developer proposes to provide this path: there are hints on the plan on p.97 of the Design and Access Statement that a path may have been designed, but it is almost entirely obliterated by the red site boundary line.

A direct route all the way from the A691 access roundabout to the primary school and onwards to the A167 is indicated, along with two more direct links between the two sites. While the Bellway application proposes part of the route to the school, it does not continue direct to the roundabout. Only one other link is proposed, and access to it is not direct: it lacks the "legibility" one would expect from an important route to the local centre.

The layout is what you would expect to get by designing the road access first, fitting in the houses, and then adding the path network last. The reverse should have been attempted, to ensure that the path network achieves primacy and priority throughout the "sustainable urban extension", as required by NPPF paragraph 112, CDP Policy 5, and Masterplan principle 10.

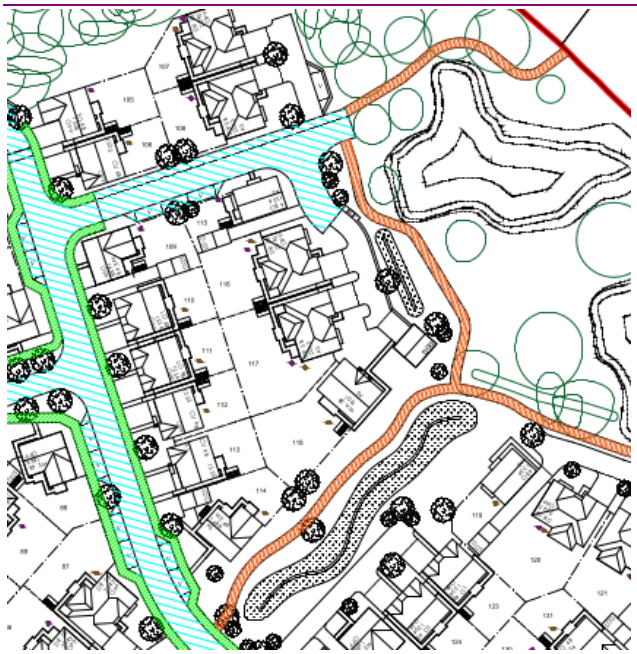
Design quality

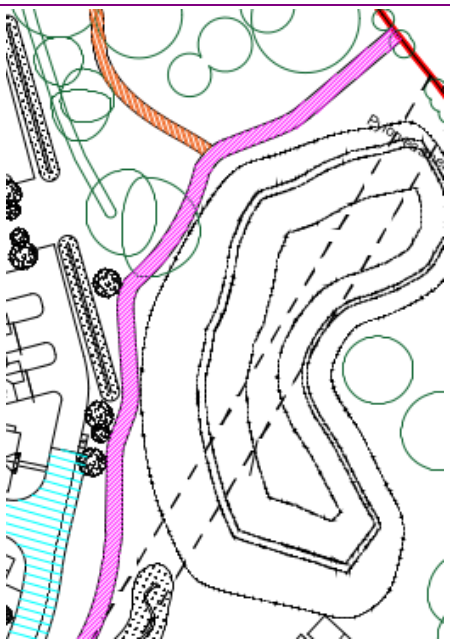
The Transport Assessment para. 5.22 states that the footway widths throughout the site will be 2.0m "exceeding DCC standards" but meeting the recommendations of *Manual for Streets*. The Trust was critical of the continued adherence to 1.8m in the Council's guidance, and welcomes this increase. However, the submitted Adoptable Highways Plan shows the widths are still 1.8m. The Trust would like to see revised plans submitted, or the 2.0m width secured via a condition.

For cycle routes, high quality would now entail compliance with LTN 1/20, the current national guidance for cycling design, as stipulated in the policies of the County Durham Strategic Cycling and Walking Delivery Plan which, according to Policy 21, "all development should have regard to". This is confirmed by NPPF paragraph 110c which requires the design of transport elements to reflect current national guidance. The Trust considers that to comply with Policy 21 applications must take into account such design guidance and that any departure from the guidance must be justified by the applicant.

Although the applicant mentions LTN 1/20 in the documentation, various features of the proposed path network do not comply. There are many examples where compliance could be achieved without major rearrangement of the layout of the development.

The indirectness of the path network across the wider housing allocation has been described, but at the micro level the paths seem to be unnecessarily indirect. Two examples, showing the main path to the local centre and the main path to the primary school:





The Key Design Principles recommend the use of “horizontal deflection, such as intermittent road narrowing and chicaning to reduce speeds” but this was supposed to be applied to the road network, not the paths!

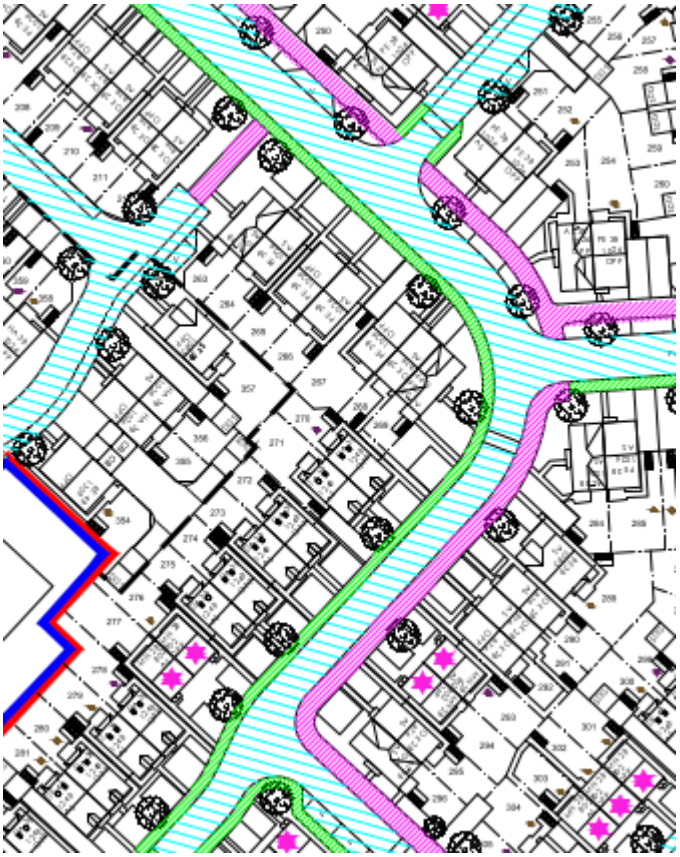
Network connectivity

There are various unfortunate inconsistencies in the documentation provided. The Adoptable Highways Plan shows cycleways in pink, footways in green, and footpaths in brown. The Movement Hierarchy Plan uses a different notation, and differs in omitting the off-carriageway cycle link to the Park and Ride. The Proposed Layout Sheet 1 labels the path leading out of the north end of the site “Cycle path connection to adjacent scheme” but on the other two plans this is indicated as pedestrian only. Page 97 of the Design and Access Statement swaps the labelling of the paths, making the north end link the only cycle path. The Transport Assessment, Figure 11, shows a cycle path running NW from the crossing of the main access road along the edge of the site by Sniperley Farm, and ending by the access road to the NW portion of the development. This is not shown as a cycleway on any of the other plans. At 2.0m wide it would not comply with LTN 1/20, and this is perhaps why it has been omitted from the cycle network.

It is quite clear that people are very likely to wish to access a number of these routes by cycling. They should be redesigned to be a minimum of 3.0m wide. In particular the route parallel to the electricity pylons, which will be the shortest route to the primary school, should be upgraded in width. The route from the north end of the site, which is likely to be the shortest route to the local shops on the B6532, should also be upgraded for cycling. A third link, along the alignment of the Masterplan's “Sniperley Hall Street” should also be provided. This will entail redesigning the road layout.

Examples of detailed design issues

The following excerpt from the Adoptable Highways Plan illustrates a number of design deficiencies:



1. The cycleway (shown in pink) near the top of the excerpt links the housing which is accessed from the Fire Station turning on the A691 to the rest of the site. The verge and visitor parking space prevent users joining the main cycleway on the other side of the road.
2. Where the main cycleway crosses the cul-de-sac the cycleway surface ends. The latest edition of the Highway Code advises that vehicles should give way to pedestrians and cyclists crossing side roads. Among the KDPs are recommendations for raised entry treatments and continuous footways. Such treatments would help to "give priority first to pedestrian and cycle movements" in accordance with NPPF paragraph 112 and reinforce observance of the Highway Code.
3. The KDPs recommend tightening side road radii in order to reduce entry/exit speeds. The radius shown here appears to be 6.0m which comes from guidance which is now outdated. *Manual for Streets 2*, para. 9.4.10 states that "advice contained in TD 42/95, that minimum corner radii should be 6m in urban areas, should therefore not be taken as best practice when the needs of vulnerable road users are to be prioritised". Tight corner radii are recommended by LTN 1/20 in paras. 7.6.10 and 10.5.4. Paragraph 10.5.16 suggests corner radii of preferably no more than 4.0m.
4. At the junction where the link road and cycleway to the B6532 turns off to the east, anyone cycling south would have to turn tightly first right and then left after crossing the road. The design is unsuitable because cyclists will be at risk from turning

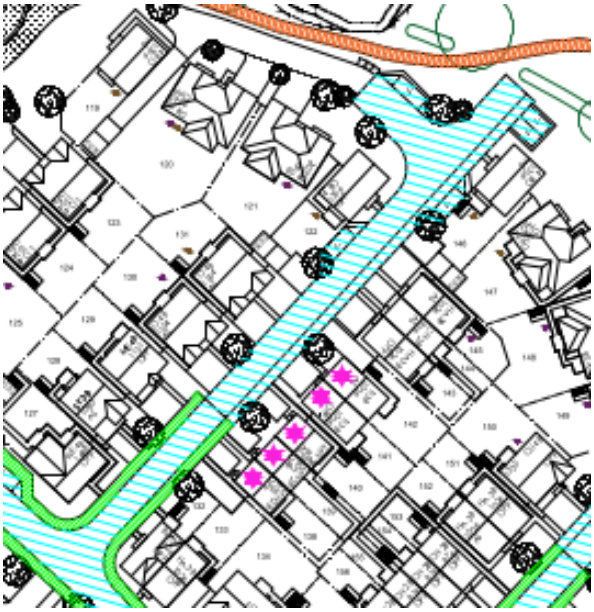
vehicles while negotiating a kerbed transition which is angled rather than end-on. The cycleway should be set back from the main road sufficiently that an end-on crossing of the side road can be provided on the southern side of the road as well as on the north. LTN 1/20 para. 5.6.1 recommends off-carriageway cycle routes should use a design speed of 30kph. The proposed alignment is not smooth enough.

5. The excerpt shows both the cycleway and the footway (shown in green) on the opposite side passing a large number of driveways. Both abut the carriageway. Typical street construction over the last few decades has the footway sloping towards the carriageway whenever a drive is crossed. This creates an undulating surface which is harder to use with wheeled equipment such as buggies, wheelchairs and cycles, and can be dangerous on foot in icy conditions. The DCC Residential Design Guide asks for a minimum width of 800mm at the back of the footway with crossfall of no more than 1:40. There is no DCC guidance given for cycleways. As the cycleway is 3.0m wide, the Trust suggests that at least 2.0m of the width should have the crossfall limited to 1:40. This could be secured by applying a condition.
6. Where the cycleway abuts the carriageway, if the kerb is the normal height then Table 5-3 of LTN 1/20 would require an additional 200mm width to maintain the effective width of the cycleway. This has not been provided.

Similar issues can be found elsewhere on the Adoptable Highways Plan.

In two or three places, a double line is shown across the carriageway, but these may only indicate a change of surface (e.g. a band of setts) rather than raised tables which would actually deliver priority for pedestrian and cycle movements. There is no clear evidence of priority being given to pedestrian and cycle movements anywhere in the scheme. The cycleway as currently proposed will be unattractive and potentially less safe than using the carriageway because of the poor side-road crossing treatments.

The following excerpt shows one of a number of examples where the adoptable footway ceases soon after turning into the cul-de-sac. No formal connections are shown to the path that skirts the edge of the site. People will inevitably create a path by walking across the grass, but there



should be a properly designed connection to ensure wheelchair accessibility.
Finally, how are pedestrians using the footway on the left supposed to cross the side road?

Cycle parking

The Council's new Parking and Accessibility SPD is still in preparation: there was an Issues and Options consultation in early 2021 and a further consultation in 2022. The applicant's Transport Assessment, paras. 5.60-5.62, follows the County Durham Parking and Accessibility Guidelines 2019.

Para. 5.61 says:

> *When applying these standards to this use, all dwellings within the site would be provided with either a garage or a secure area designated for cycle storage. The apartment dwellings would be provided with shared, secure cycle shelters in communal areas for cycle storage.*

Para. 5.24 of the Design and Access Statement states that

> *A publicly accessible cycle hub will be provided within the south east of the site near the apartment buildings. Individual properties will be provided with private and secure cycle parking in garages or in rear garden sheds where garages are not provided.*

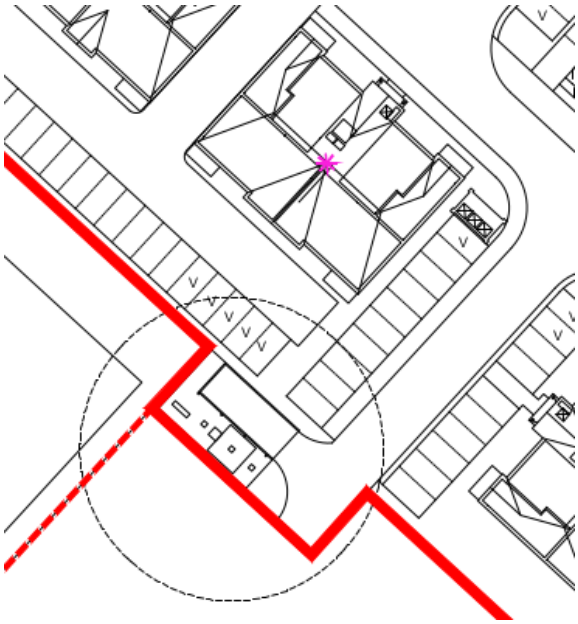
Similar text appears at para. 7.50.

Apartment blocks

The plans for the Beekeeper and Honeyman apartment blocks do not show any cycle parking on the ground floor of the block. Without proper provision residents may be tempted to use some of the stairwell space on each floor to store bicycles, and this could be a risk during a fire evacuation. On the Proposed Layout drawings there are some rectangles close to the buildings but it is not clear if these are secure cycle parking (e.g. lockable hangars).

It is not clear whether the intention is for residents of the apartments to use the public “cycle hub” or whether private cycle parking is provided for their use. If the cycle hub is publicly accessible, what will the security arrangements be?

The location of the cycle hub is not clear on the plans. There is a possible structure to the rear of the apartment car parking (within the area circles in the following excerpt).



Best practice for apartment residents would be to provide storage for cycles and other mobility equipment in a secure area easily accessible within the ground floor of the apartment building. External cycle storage is more at risk from theft, and needs to be properly overlooked.

The design of the cycle parking is not shown. A condition should be applied to ensure that the cycle parking does not just cater for standard cycles but also for equipment which may be used by families or disabled people, e.g. child/cargo trailers, adapted cycles.

Houses

Most of the house designs have no internal space available for cycle storage. The applicant proposes to provide secure garden sheds, but these are inevitably less secure than storage within the house.

The present application shows bin storage on the Adoptable Highways Plan, but not on the Proposed Layout sheets. The shed locations are not shown even though para. 5.81 of the Design and Access Statement says that the “location and treatment of services including bin stores and cycle storage has been considered within the design proposal”.

Access to back gardens is difficult with mid-terrace properties. Plots 48, 32 and 33 in this excerpt from the Adoptable Highways Plan have access routes which go round the back of another property. It is regrettable that these affordable homes, where the occupants might particularly benefit from cheaper transport, will have difficulty accessing their cycle storage. Locations to store the dustbins and cycles at the front of the property would be much more convenient for the householders.

Car parking

Garage and storage provision

If the applicant is following the Council's 2019 guidelines, it should be noted that single garages are required to be a minimum of 3m width by 6m in length. The 2022 consultation version of the Parking and Accessibility SPD continues to recommend the same minimum size. Most of the house designs narrowly comply with this requirement, but the “Forester” single garage is only 2.7m wide and 4.9m long.

We have tried to use the House Type Plans Pack to check details or garage sizes and cycle parking, but the table on the second page, showing which house types appear on each plot, does not appear to correspond to the Proposed Layout sheets. For example, in the table plot 147 is a Draper but it appears from the plans actually to be a Weaver. Plot 128 is shown in the table as a Sawyer but clearly from the plans it is a Watchmaker. These were the first two we checked: there must be many more faults with the information. Checking the Adoptable Highways Plan reveals that it has entirely different plot numbering.

Visitor parking spaces

The distribution of visitor parking spaces across the site is much better than in the previous application, but with driveways governing much of the street frontage, the visitor spaces are very often somewhat removed from the houses they would serve.

Examples of specific design issues

The Trust supports the design of car parking for plots 194-199 which could be described as a “rear parking court”. As this is the only road access to the properties, the Trust considers this is an appropriate solution. The placing of garages is generally improved by comparison with the previous application.

General design issues

The general layout, with car parking mostly in front of houses, will make streets unattractive and dominated by parked cars. This is particularly the case with smaller semi-detached houses where most of the street frontage is taken up with parking spaces. The Council's Building for Life SPD paragraph 11.5 recommends at least half of the street frontage to be landscaped to reduce vehicle domination and suggests alternative car parking solutions for higher density situations. Paragraph 5.21 of the Design and Access Statement acknowledges this issue, and says that on-street parking "will be carefully designed to be typically no more than 4 spaces appear [sic] in a row, and areas of landscaping and/or planting should be used to break up the appearance", but does not offer any solution for the on-plot parking.

The Guidance Notes for Design Codes section M.3.i favours unallocated parking as an efficient use of land, and also suggests options such as parking courts and car barns to concentrate allocated parking provision. While locating residential car parking in front of each house does simplify the provision of electric car charging points, this is by no means the only possible solution to encourage the use of electric vehicles, as demonstrated by the developer's commitment to passive charging provision at all visitor parking spaces. The Council's Building for Life SPD paragraph 11.2 recommends on-street parking for its potential to be more space efficient and to encourage social contact. A higher proportion of unallocated parking would also deal with the uneven distribution of visitor spaces noted above. The Building for Life assessment by Pegasus Urban Design (Design and Access Statement part 2 PDF p. 51) notes room for improvement on car parking.

The Transport for the North Decarbonisation Plan recommends actions which local authorities can take to help decarbonise transport. These include car-free zones and streets, and unbundling the cost of parking from new housing prices to incentivise take-up of car-free or car-lite development.

There is an excellent opportunity for Sniperley Park to make more efficient use of the land available taking advantage of the proximity of the Park and Ride site to satisfy part of the residential parking requirement. Residential parking will be used predominantly when the Park and Ride car park is relatively empty, and vice versa. Streets within a suitable distance of the Park and Ride car park could be designed car-free, with no or minimal parking available outside the houses, and narrower access roads primarily for refuse collection, deliveries and cycling or walking. Householders would rent a space in the Park and Ride, decoupling the cost of the parking from the house ownership. This would provide an incentive for people to limit and reduce their car ownership, in line with the demand reduction targets of the TfN Decarbonisation Plan and the DCC Climate Emergency Response Plan 2. These measures could be combined with more car club provision, as encouraged by Paragraph 4.4 of the Council's Building for Life SPD. The applicant currently proposes a single car club space for the whole site, but has not justified this level of provision with any evidence or strategy. With less need to provide residential parking spaces and access road capacity, land could be reallocated to green space without reducing the density of the development or the yield for the developer.

By proposing an unimaginative street plan the developer has failed to address various requirements of NPPF. For example paragraph 104 requires development proposals to realise

the “opportunities from existing or proposed transport infrastructure” (e.g. proximity of the Park and Ride site) and “changing transport technology and usage” (e.g. transport decarbonisation entailing demand reduction and a move away from the private car) and to assess the “environmental impacts of traffic and transport infrastructure” (e.g. the land requirement for access roads and parking) “including appropriate opportunities for avoiding and mitigating any adverse effects” (e.g. by not providing parking allocated to every plot) with the aim that “patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places” (rather than streets dominated by car parking).

There is no evidence that the developer has seriously considered any of these fundamental requirements. It is a standard volume-housebuilder's proposal rather than a “high quality, zero carbon, well-designed community that will stand the test of time and leave a legacy which Durham will be proud of” – an excerpt from the Masterplan quoted on the second page of the Design and Access Statement.

Bus stops and services

The Trust very much welcomes the provision of the link road to allow a bus service to penetrate the site, but considers it unwise to allow general motor traffic access along the length of this route. A bus gate would help encourage sustainable transport, particularly for access to the primary school.

Access to A691 bus stops

Formal bus stops on the A691 are proposed, and this is welcome. Unfortunately no crossings are shown to access the west-bound bus stop, aside from the uncontrolled crossings at the roundabout. The road currently has a 60mph limit but the developers propose that it be lowered to 40mph. The geometry of the roundabout would allow for quite high speeds.

Table 3 of the CIHT publication Planning for Walking (March 2015) suggests that for 40mph roads uncontrolled crossings or central refuges are only appropriate in low flow environments, which is clearly not the case here. For the A691 a zebra or signal controlled crossing would be recommended.

This is backed up by Table E/4.1 of CD195 Designing for cycle traffic (Highways England, September 2019). For a cycle route crossing a two-lane roundabout entry as shown in the proposals, a parallel light-controlled pedestrian/cycle crossing would be required. It would be no less necessary for a pedestrian-only crossing to be light controlled.

Without proper crossings of A691, the access to the bus stops cannot be considered safe. The X5 and X15 buses on this road would provide useful access to St Leonard's School, for example, but without safe crossings parents would be more likely to drive their children there and back.

Distance to bus stops

Various documents submitted with the application (e.g. the Residential Travel Plan and the Bus Service Strategy) state that the Council has set a desirable maximum distance to a bus stop of 400m, and an absolute maximum distance of 800m. The 400m requirement is found in

successive iterations of the Council's Parking and Accessibility Standards, the Council's Building for Life SPD, as well as the DfT's December 2021 edition of *Inclusive mobility* which states (p. 84) that "in residential areas, bus stops should ideally be located so that nobody in the neighbourhood is required to walk more than 400 metres from their home". The adopted Masterplan states (p. 41) that "all parts of the site should be within 400m walk of a bus stop". The 800m figure is not given in any of these documents, yet the applicant relies on it heavily.

Paragraph 5.223 of the County Durham Plan supports Policy 21 and notes that the "**proximity and frequency** of bus services is a key consideration". Each has a bearing on the other. The CIHT document *Buses in Urban Environments* (January 2018), which is quoted in the applicant's Transport Assessment, advises that where frequencies are less than every 12 minutes the maximum walking distance to stops should be 300m, whereas up to 500m could be acceptable where bus stops are on core bus corridors with two or more high-frequency services (equating to 10 or more buses per hour).

In paragraph 5.38 of the Transport Assessment the applicant notes DCC's planning application for the Park and Ride extension where it is stated that "walk distances of up to 1km are acceptable to P&R sites". The applicant uses this to demonstrate that the whole of the site is within the required distance. Checking the AECOM Transport Assessment for the DCC application it is clear that the CIHT guidance quoted there has been misinterpreted. The 1km figure shown in table 2, para. 4.2.1, is the "acceptable" limit for "Commuting / School" (the "desirable" limit is 500m). The fact is that the distances given by CIHT are not to be applied to multi-mode journeys. The commuting/school distance is the figure appropriate for a journey entirely on foot. It is clear that a 1km journey on foot followed by a bus journey on congested roads and then potentially a further walk to reach the destination is not competitive with the private car. A 1km journey by foot to the Park and Ride would only be regarded as acceptable if the pedestrian is employed at the Park and Ride site. This casuistry has no place in a planning application.

Table 3.1 of the Transport Assessment claims to show the number of buses per hour from the A691 bus stops and the Park and Ride at different times of day and on Sundays. It states that there are 34 buses per hour Monday to Saturday daytime from the Park and Ride, and 12 per hour in the evenings. The Park and Ride service ceases at 18:36 in the evening and is only four buses per hour. The figures for the A691 are also totally inaccurate. The combined X5 and X15 give a half-hourly services Monday to Saturday, and hourly in the evenings, rather than 12 per hour daytime and 8 per hour in the evening as given in the Transport Assessment.

It is clear that each bus stop has a service frequency less than every 12 minutes, therefore the CIHT's applicable maximum distance for walking to the bus stop is 300m.

Assuming that a bus service is provided passing through the development, with suitably located bus stops, many of the houses will be within 300m of a bus stop and almost all will be within the 400m required by the DCC adopted Masterplan. Figure 14 on p. 44 of the Transport Assessment confirms this: it shows distances assuming the creation of the through bus route and access to the B6532 from the north-west of the site. Both of these depend on the County Durham Land development coming forward. Figure 12 on p. 42 shows the position without

access to the B6532. A significant proportion of the houses, perhaps as much as 40%, will be beyond the 400m distance, and maybe 60-70% of the houses will be beyond the CIHT's recommended 300m limit for bus stops on low frequency routes.

The Trust considers that for the development to provide acceptable bus access, the link road to the B6532 and through bus service must be available to enable the build-out of the whole site. The northern parts of the Bellway site, which are beyond 400m of the existing P+R and A691 bus stops, should not be occupied until better bus access is in place. The Trust asks that a condition be applied such that each tranche of housing cannot be occupied unless a regular bus service to Durham city centre is accessible within 500m. If the applicant wishes to develop the whole site before the B6532 links are available, it would be possible to satisfy this condition through the applicant subsidising a temporary service.

Quality of services

The Transport Assessment makes little comment on the evening bus services, which are hourly on the A691 only. Without good evening bus services anyone living in the proposed housing would be stranded and unable to access work, social and leisure activities unless they have access to a car. It is a simple fact that those who own cars are very much less likely to use bus services, even when the services are frequent. This will very much reduce the take-up of sustainable transport from the site. The Trust is of the view that financial support for more frequent evening bus services in order to establish bus use by new residents would be appropriate.

Reducing distances to bus stops

The applicant's design will need further revision to provide space for bus stops and bus shelters on the internal road network, in accordance with the adopted Masterplan's Access & Movement provisions. The DCC Highways Design Guide for Residential Development p. 91 requires a minimum footway width of 3m at bus stops. Raised kerbs for boarding may be desirable, and the Masterplan notes that shelters and real-time information boards may be appropriate. The alignment of the A691-B6532 link and the internal path and road network must be designed to minimise the walking distance from houses to the bus stops.

As noted in relation to Policy 5(a) in the Trust's main response, the path network connections to the A691 for access to the bus stops are poor.

Other options

Another way to shorten the distance to bus services would be to provide a footpath connection from the northern end of the development linking with Witton Gilbert footpath 8, allowing access to the A691 about 500m north-west of the proposed bus stops. Further stops and a crossing could be provided there. This might require the acquisition of land which the developer does not currently control.

Assessment of site accessibility: pedestrians and cyclists

The penultimate paragraph of CDP Policy 5 requires “convenient, safe and high quality bus, pedestrian and cycle routes within, and connecting to, adjoining facilities”, and for the movement frameworks of each site to “incorporate any relevant schemes within the Durham

City Sustainable Transport Delivery Plan". The stance taken in CDP Policy 5 has backing in NPPF paragraph 112a which requires developments "give priority first to pedestrian and cycle movements, both within the scheme **and with neighbouring areas**" (emphasis added).

In conjunction with this proposed first phase of development, the Trust would expect to see, as a minimum, enhancements to the pedestrian and cycling environment to provide safe crossings of existing roads, including at all the roundabouts, and high quality continuous links to the Framwellgate Moor shops and schools, to the County Hall roundabout (linking to existing routes to the city centre), and to Durham Johnston School. Plans for signalising the Sniperley roundabout, which include signalised routes for pedestrians and cyclists, were recently released via a Freedom of Information request. Implementation of these plans would go part way towards meeting the active travel connectivity needs.

Appendix 19 of the Transport Assessment (p. 254 onwards of the second PDF) gives notes of a meeting between both applicants and DCC in November 2022 at which the sustainable travel interventions in the Health Active Travel Connectivity Plan were discussed. Section 10 of the Transport Assessment lists those interventions which the applicant is prepared to fund or contribute to:

- part of an on-site route from Pity Me to the Park and Ride
- pedestrian and cycle facilities at the Sniperley roundabout
- a route upgrade from the Park and Ride to Framwellgate School
- vegetation clearance along the A691 to Witton Gilbert

The Trust very much welcomes the commitment to creating a largely off-road walking and cycling route to Framwellgate School, and would be keen to provide practical input to the refinement of this scheme, which relies rather heavily on shared-use pavements when some sections could enable separation of cycling and walking. The main weakness in the proposal, however, is the failure to tackle the Blackie Boy roundabout. Without safe crossings there, it is likely that many parents will not be prepared to let their children travel unaccompanied to the school.

The Trust would like clarity on the delivery of the Sniperley roundabout improvements. One drawing submitted shows the widening of the entry to the roundabout from Dryburn Park as the sole intervention. It is said that the additional traffic generated by the development will make it harder for drivers to gain access to the roundabout from Dryburn Park and the widening will reduce the impact. Widening may make it harder for pedestrians and cyclists to cross this arm of the junction.

The drawings submitted by Bellway for the proposed cycle/walking route from the Park and Ride to Framwellgate School includes a zebra crossing of the northern (A167) arm of the roundabout.

The Trust has also seen plans for signalising the whole roundabout. These plans create much better cycling routes, but still fail to assist vulnerable road users at the Dryburn Park arm.

The Trust is of the view that signalising the roundabout should be completed before the occupation of any of the Sniperley Park site, as the current roundabout is very discouraging for active travel.

The Trust objects to the fact that widening of the A167 cycle route to Durham Johnston School have been dropped. Policy 5(l) explicitly requires contribution to A167 capacity enhancement between the Sniperley roundabout and Neville's Cross. The Trust would prefer to see this carried out by eliminating some of the central hatching in order to accommodate a two-way cycle track, protected by kerbs, along the eastern side of the A167. This would enable modal shift on this corridor and thereby increase capacity, and would reduce conflict between people walking and cycling.

The A691 Park and Ride roundabout must not be forgotten: it also currently has pedestrian/cycle crossings which are not compliant with the current guidance.

Finally, the Trust would like the Planning and Highway Authorities to consider how the Durham City Sustainable Transport Delivery Plan measures for north-west Durham are actually to be delivered, particularly the cycle and walking upgrade from Sniperley and Framwellgate Moor to Aykley Heads. None of the recent developments at Aykley Heads have contributed to cycle and walking improvements at the B6532 Dryburn Road hospital roundabout. Cycling improvements on Dryburn Road, amendments to the bus gate at Front Street, and creating a bus/cycle only approach by New College Durham appear not to be funded through the Sniperley developments. Yet all of these will be required to achieve the Sustainable Urban Extension that was envisaged in the County Plan.

Travel Plan

Travel Plan targets

The 73% initial car/van trip share proposed in Table 6.2 of the travel plan (contained within the Transport Assessment) is based on the 2011 census figures for E02004310, the middle-layer super output area (MSOA) within which the site falls. This is quite a wide area, and includes Witton Gilbert, Bearpark, parts of Ushaw Moor and Broom Park, all of which lie firmly outside the core Durham urban area. The reduction target is 5 percentage points, giving a Car Driver target of 68%.

By comparison, the 2011 census figure for Car Drivers in the MSOA covering Framwellgate Moor and Pity Me was 63%. The new “sustainable urban extension” would be expected to have different travel to work patterns from the existing villages which make up the bulk of the E02004310 census area. Indeed, this was part of the argument for making the green belt release in the first place. However, without much more frequent bus services, it would not be possible to attain the lower car driver figures of Framwellgate Moor.

Census results are also available for smaller areas. Area E00105090 mainly consists of the housing at Witton Grove, between Sniperley roundabout and the site, and Westcott Drive, just east of the A167. It had a a car share of 68.1%, and a pedestrian share of 13.4%, over double the target figure for walking proposed in the travel plan.

This suggests that, based on the location and the policy context, the modal share targets need to be substantially strengthened if the site is to match and improve upon the sustainability of neighbouring areas.

The Trust considers that the Travel Plan should be front-loaded, to aim for a much lower starting target, reflecting the urgency of the climate emergency and the fact that the best time to get people to change their travel habits is when they move house. With the correct approach, this is achievable. For example, the DfT's Propensity to Cycle Tool suggests that the area could generate a travel to work share of 11% by bike (an increase from 1% at the 2011 census) if good cycleways are provided to key destinations. Increased bus service frequencies, initially supported through developer contributions, would also have an impact. Policy 5 requires that the Travel Plan reduce reliance on the private car, yet the proposed targets would simply entrench it. Every effort should be made to realise CDP Policy 5's vision of a Sustainable Urban Extension.

To arrive at a reasonable set of targets, we could take the 68% figure for the Witton Grove area as a baseline, which is a compromise between the Witton Gilbert / Bearpark 73% and the Framwellgate Moor 63%. Front-loading half of the 5% reduction suggested by the developer would give a starting point of 66% with a 3 percentage point reduction to be delivered over five years. Even this is probably less ambitious than is required: the Council's Climate Emergency Response Plan 2 requires a reduction in fossil fuel car use equivalent to a 25% reduction in vehicle miles by the end of 2023.

The Technical Memorandum submitted on behalf of National Highways in relation to the previous withdrawn application expressed concern about the Travel Plan targets:

> We would also suggest that a targeted 5% reduction in the proportion of future households travelling by car in peak periods is not ambitious enough, especially considering the opportunities to link to the proposed development to an existing, and possibly expanding, P&R.

If the Council's aim is to maximise the sustainable transport potential of the site, as might be expected from policies 5 and 21 of the County Durham Plan, then not only should the Travel Plan targets be more ambitious, as suggested above, but the Council should also require more robust assessments of the active travel and public transport accessibility of the site, in order to identify and secure funding for infrastructure and service improvements.

Proposed Travel Plan measures

Overall the Travel Plan promises an information pack, vouchers – the value of which is not stated - discounted cycle equipment, some surveys, and setting up a Bicycle User Group, which, by the estimates of trip generation, would contain about three members! There is no offer for more costly interventions should the travel survey results demonstrate they are needed.

The Travel Plan cannot make up for the poor design decisions which repeat the mistakes made at countless suburban estates built over the last few decades. The Travel Plan appears to have had no impact on design decisions such as car parking provision. A Travel Plan is no substitute

for actually designing developments which promote sustainable transport through their layout, density, connections, and quality of environment, as is required by the NPPF.

Summary

There is a real risk that a new development, well-connected to the A167 and A691, will be more car-dependent than the existing communities in Framwellgate Moor. The Trust considers that the Travel Plan needs to be backed by the potential for further off-site improvements to radically improve active travel and public transport connectivity, supported bus services, and a car parking and car-share strategy which is effective in reducing car ownership and shifting the balance towards sustainable transport.

In summary, the Travel Plan:

- should have a lower starting target for car/van use (66% initially, with a reduction to 63% over 5 years)
- will need more ambitious targets for reducing carbon emissions in line with DCC's CERP2
- should incorporate working from home as a mitigation, including hybrid working
- will require annual travel plan surveys and targets which assess the distance travelled, not just the mode, and which are sophisticated enough to track a changing mixture of on-site and at-home working in a hybrid working environment

Phasing and conditions

Once the application has been refined to the extent that it is possible to recommend approval, it will be important to attach appropriate conditions to secure the sustainable transport improvements in a timely manner. Walking and cycling routes should be completed before the first occupiers move in, along with the new bus stops, as the best time for people to form new travel habits is when they move house. As the build-out progresses the most direct paths giving access to amenities must be opened before the houses are occupied.

As an illustration of the difficulties which residents might experience if conditions are not carefully applied, the Trust offers the example of the Mount Oswald estate which was masterplanned with a good network of recreational paths, connections to the surrounding path network, and a cycle route alongside the main access road.

- Some of the key links were still not open several years after the first houses were occupied.
- The cycle route and footway by the new colleges at Mount Oswald was only properly surfaced two years after the colleges opened.
- Where dropped kerbs have been provided, some of them are unusable bywheelchairs because of delay in bringing the carriageway up to the finished level.

A planning condition could be applied along these lines:

‘No part of the development shall be occupied until

a) the pedestrian and cycle route to the Park and Ride bus stop has been finished and opened;

b) the new A691 bus stops have been provided, including a suitable crossing to the west-bound stop, and linked to the development via direct pedestrian path connections;

These facilities shall thereafter be kept open while any further construction work proceeds. No plot shall be occupied until the main pedestrian and cycle routes connecting that plot to the surrounding network are available for use, including by wheelchair users, and these routes, or reasonably convenient alternatives, shall be kept open while any further construction work proceeds.'

Reason: to give priority to pedestrian and cycle movements, to address the needs of people with disabilities, and to promote sustainable transport methods in accordance with Policy 21 of the County Durham Plan and Part 9 of the National Planning Policy Framework.

A condition to ensure the timely provision of bus services penetrating the site should also be applied.

Refusal of planning permission on transport grounds

The Trust is of the view that the transport deficiencies of the application are sufficient for refusal to be justified on those grounds alone. It will not be possible to secure sufficient modifications to the design by attaching planning conditions, because improving the walking and cycling access and adding bus stops would require alteration to the street layout, as would a sustainable car parking strategy.

An earlier version of the NPPF included a paragraph which stated that "development should only be prevented or refused on transport grounds if there would be an unacceptable impact on highway safety". Developers were fond of quoting this paragraph in order to argue that whatever transport deficiencies there might be with their designs, they were not sufficient to justify refusal of planning permission. It was clearly not the government's intention to forbid refusal of applications which failed to support sustainable transport. More recently what is now paragraph 111 of the NPPF was amended to refer to refusal "on highways grounds" making it clear that it is appropriate to refuse applications if a development proposal fails to identify and pursue opportunities to promote walking, cycling and public transport, even if the impacts on highway safety are minimal. In this way the NPPF supports the urgent need to improve and promote sustainable transport as part of the nation's response to the climate crisis.

The Trust considers that this application has failed to comply with local and national planning policies relating to transport to such an extent that it would be right to refuse it on those grounds alone.
