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Dear Mr Kelleher

County Durham Design Code Supplementary Planning Document (SPD) Draft 2023

Thank you very much indeed for the opportunity to comment on the above draft document. The City of Durham Trust strongly supports the County Council's initiative in producing a range of SPDs to assist with interpretation and application of particular County Durham Plan policies. We share the desire to secure consistent and focussed planning applications and submissions that address the requirements laid down in policies and to remove the difficulties that have been experienced by Members, officers, applicants and consultees in some cases.

We have posted our answers to the questions using the on-line facility but have also set them out in this letter so that we can express the above contextual paragraph to you.

001 Do you have any comments on the draft SPD?

Introduction Pg 3/Policy Context Pg 4/Background Pg 6.

The Trust is appreciative of this draft where it aims to fulfil the guidance offered by the National Design Code and its supporting documents. The introduction is appropriate and the policy context and background well explained. Given the lack of other county-wide examples and the early stages of Design Code development at this scale, any first draft is to some extent breaking new ground.

The relationship of this SPD to the other SPDs need identifying; a 'road map' would help. As an example, how does it relate to the Parking and Accessibility SPD? The code will need to show how it will relate to the City's Settlement Study and the Durham Conservation Area Management Plan (DCAMP). There will be substantial pressure on the DCAMP to provide sufficient context and detail to adequately guide ensuing detailed design codes and this needs cross referencing.

The Policy Context section shows that neighbourhood plans are an influence upon this code. The Durham City Neighbourhood Plan (DCNP) involved substantial research and endeavoured to establish broad principles of design (see Policies H2 and H3). It is essential that this design

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code demonstrates how it relates to the DCNP and uses it to tie both policy and content into the code. This also may be the case for other neighbourhood plans in the County. In general, there should be reference to the need for community involvement in the Design Code process, particularly for larger developments. There are valuable community resources and these are evident in the neighbourhood plan process and the work of the City of Durham City Parish Council.

The National Character Area profile provides a sound basis, particularly where historic settlements relate to their geology through their building materials. However, over-reliance on this basis of geology, landscape character and settlement categories for simplifying coding leads to problems. These analyses are of course extremely useful in the process generally, but do not provide the full background needed for coding. The Design Code is more related to settlements and their adaption to change. As an example, the Tyne and Wear Lowlands section doesn't even mention Durham City, only Peterlee and new towns. There is more that will be needed on how building materials have changed from a geological basis, through imported materials by railway and on to the current universality of supply. This can be incorporated at a high level for further detail as part of the settlement studies. This could be fundamental in aspiring to maintain and enhance settlement distinctiveness. It is a key issue for Durham's new developments. Greater adaption beyond the Character Study is needed for this Design Code.

Sustainability in all its aspects needs to be more of a thread through the code. This underpins many of the topics and is a key issue in improving new development in Durham. Biodiversity as a further example, needs also to be more embedded as part of sustainability. Layout is key to solar gain and new developments need to be future-proofed to ease meeting new energy standards. A key factor for the City's historic areas is retrofitting for improved energy performance. This ranges from solar panels to wall insulation; these and others can have a high and sometimes negative impact on conservation areas in particular.

The draft SPD moves on to further describe context and distinctiveness leading to settlement categories and then the generation of model design codes for the categories. It is this process and its conclusion that the Trust feels is insufficient to fully aid the production of design codes for developments in Durham City. It understands the complexity of the task and the extensive range of settlements leading to a heavy burden of background research.

The result, in the view of the Trust, is a failure to adequately outline Durham City's characteristics even at a high level and to lead to code that will help in steering design codes for its future developments.

The first point where this starts to show is **Page 14** where Durham City is grouped with Barnard Castle, Bishop Auckland and Chester-le-Street to merge their characteristics together. This may work in other contexts but not for this SPD. Durham City is significantly different by scale and complexity not to be simplified this way. It simply doesn't fit with the others although there are superficial similarities. Durham is unique – the World Heritage Site (WHS) designation backs this up. Its scale, importance and domination historically push it into a different category of its own. Its function as a county focus for services and later development reinforce this. Even now the

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clustering of administration functions – the County Council itself, Passport Office and NSI - demonstrate this. Add in the University and its current domination of the city, its inner residential areas and economy and these move it further from the other towns. Later modern suburban development and the current urban extension push it further still. Durham clearly sits at the centre of transport links historically i.e. the Great North Road and the East Coast Main Line railway - it remains a hub. As a result, the current code shows detail in some areas while missing substantial areas needing greater guidance. The suburban wings of the city clearly need their own sections. The new city centre developments are large enough to demand coding if further development or change ensues. The University areas and Aykley Heads equally need specific emphasis.

There is much that is shared in the typology on **Pages 23-26**. However, for Durham this misses the impact of the WHS in its entirety. It concentrates on the city core and inner city to the exclusion of the rest of Durham with its large suburban ‘wings’ and extensive new inner city developments. In its 20th century growth the city has absorbed formerly distinct settlements like Framwellgate Moor and Carrville which would otherwise fall under one of the other typologies, and these should also be recognised in the code. Substantial change close to and within the city centre from the 20thC onwards has profoundly impacted on the city. Continuing adjustment following the collapse as a retail centre is currently consistently moving towards leisure uses, also with substantial impact. These need recognition within the code. Finding a route to distinctiveness within the suburban and inner city expansion areas can be lost where the immediate context is used for guiding the design. It effectively rules out enhancement and results in examples of recent inappropriate volume house or other building being used to guide new design.

Pages 24 and 25 have relevance but need pushing further for the city. The illustrations are encouraging but not a reflection of where Durham is at the design of new buildings. Outside the historic core the code over-emphasises conforming with the existing development patterns. There is a recognition in the National Design Guide that future designs need to be better than what has gone before. For example, to deliver sustainable transport, 15 minute neighbourhoods, and to meet the demand for accessible and adaptable homes the design of infill development and larger developments will need to depart from current patterns, with gentle densification and a wider variety of built forms. Para. 8 of the Guidance Notes for Design Codes recommends two steps: (a) an analysis of the existing character of an area and (b) a visioning exercise to work towards a future enhanced vision for each area. It is not clear that such a vision is being articulated.

Backland development is discouraged for the historic core but is an issue for other residential and suburban areas as well.

Page 26 does not adequately deal with the large city suburban developments – the design of the new expansion areas being a very significant current issue.

Page 27 and its landscape aspirations are well aimed but need a tighter city perspective. However, layout is at the heart of adequate design especially for larger developments. It is in this situation that the lack of any detail on design for Active Travel is most acute. The parking

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requirements for settlement edge sites will make it hard to achieve viability for public transport and entrench car dependency. The Trust submitted a detailed response to the Parking and Accessibility SPD consultation in 2022 and if our evidence is persuasive there will need to be significant changes in how car parking is planned for edge of settlement developments. Sustainability through layout relationship to solar gain should also be a factor but is conspicuously missing from new developments in Durham.

Where appropriate to the Trust's area of interest the various village sections are well judged and helpful (**Pages 28-36**). The Trust would very much like to see developments of the quality illustrated. There should be reference to striving for excellence. The Trust has previously noted examples of good practice in York.

The extensions section (**Page 50**) is very interesting and may provide scope for future better design. The scale of rented accommodation extensions and suburban house enlargement in Durham is a continuing issue. The pressure for these and the brutal reality of economics is very different to the ideal bespoke developments illustrated. Help from this SPD is needed for the City.

The Newton Aycliffe settlement character study is a solid and well produced example. For the City it will inevitably be a crucial and more complex piece of work. How this integrates with the work on settings and conservation areas may well prove useful in this.

Topics Omitted

Page 6 introduces the ten key characteristics from the National Design Guide. The proposed County Durham Design Code is largely or entirely silent on a number of these characteristics, in particular:

- Nature: high quality green open spaces that support play, water management and a rich and varied biodiversity. In view of the declaration of an ecological emergency far more attention should be given to this aspect of design.
- Public space: creating well-located and attractive public spaces which support social interaction.
- Use: a mix of uses, tenures, types and sizes, supporting social inclusion.
- Homes and Buildings: internal/external environment, attention to detail on storage, waste, servicing and utilities.
- Resources: energy hierarchy, materials and techniques, resilience. While materials are mentioned in the proposed code, this is from a visual perspective rather than one of sustainability.
- Lifespan: well-managed and maintained; adaptable to changing needs and evolving technologies; a sense of ownership.

While the National Model Design Code makes it clear that design codes are not expected to cover all of these issues, there is no rationale in the proposed County Durham code for which aspects have been included and which omitted. Para. 27 of the NMDC lists certain topics which should be included as a minimum and para. 28 advises on others which would be expected for codes which cover large scale development.

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The National Design Guide and Model Design Code both include three main themes within the Movement characteristic. The Active Travel theme has been omitted from the summary on **page 6** and from the proposed code. The only aspect of Movement treated in any detail within the proposed code is car parking, and this is very weak in terms of effecting better design. While the NMDC para. 49 identifies parking as one of two key variables for Movement, that does not mean other design aspects should not be covered. The point is that parking is a *variable*: the quantities and types of provision will vary by area. It is clear from Figure 2 on page 7 of the NMDC that many other aspects of Movement would be expected in a design code, and would probably fall into the part of the code which would apply to all developments and settlement typologies, as envisaged in section 3.B of the NMDC. It is noticeable that there is no code-wide guidance in the proposed County Durham Design Code.

The recent planning applications for Bent House Lane and Sniperley Park illustrate the car-first approach to layout which will eventuate if this omission is not addressed. The code should cover the macro-level, in terms of the primacy of the walking and cycling network and the layout of that network in relation to amenities, and the micro-level such as junction design, as covered by section M.2.ii of the Guidance Notes for Design Codes.

Para. 4 of the Guidance Notes for Design Codes states that effective design codes rely on visual and numerical information rather than detailed policy wording. The visual aspects are reasonably well covered with the illustrations (though some, like the shared courtyard parking at Thomgate, Barnard Castle, featured on p. 27, are not perfect models to aspire to). There is little numerical information, aside from heights of fences and lengths of gardens. Key parameters such as density, floor area ratios and plot ratios are lacking.

Generally the greatest weakness for Durham is in layout and the essential basis needed for development. Finding an adequate response to new house design for the larger new housing areas that responds to the best of Durham needs more work and substantial assistance through pointers in this upper tier code. These issues are very conspicuous failings in plans and design guides submitted with major housing submissions.

Typographical errors

Page 10 refers to “Magnesium Limestone”. These should be corrected to “Magnesian Limestone” (as in the illustration on page 9).

Conclusion

The Trust hopes that the above comments are helpful in achieving the welcome purpose of this Supplementary Planning Document. We look forward to the consultation on the final draft.

Yours sincerely

John Lowe, Chair, City of Durham Trust