

THE CITY OF DURHAM TRUST

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

Web site: <http://www.DurhamCity.org>

8 June 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 revisions to the above application. This letter deals solely with aspects of the walking and cycling network within the site.

Inconsistencies in the application

The covering letter for the revised documents, dated 2 May 2023, describes in section 2(a) various changes to the walking and cycling network. It states that

- a continuous surfaced route is provided along the north-eastern boundary with additional connections into the adjacent application site;
- the north-eastern connection into the land under the control of County Durham Land has been upgraded to a pedestrian and cycle connection;
- the pedestrian connection north of Sniperley Hall has been upgraded to accommodate cycle movement.

The documents which accompany the covering letter, however, are inconsistent and contradictory. There is usually a standard condition applied to any planning permission to require that the development be built to correspond with the submitted plans. It is essential that the correct plans are identified in the condition, and it may be necessary to request corrected drawings from the applicant prior to determination.

The main inconsistencies are as follows:

- Page 55 of the revised Design and Access Statement seems to be consistent with the covering letter, showing a cycle connections at the

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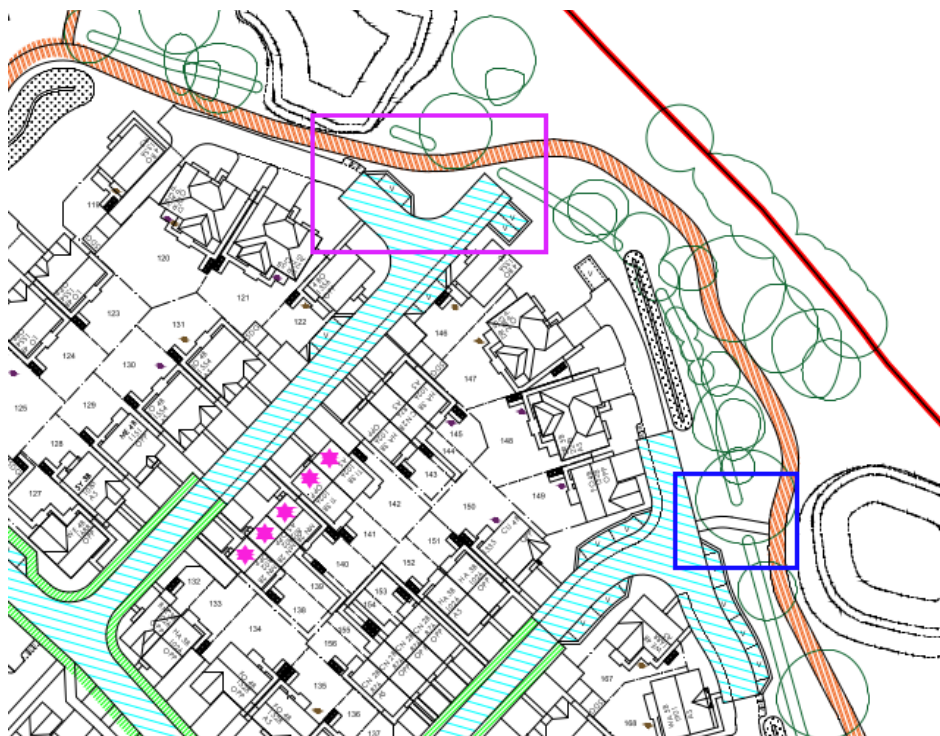
northern end of the site, through the green space surrounding the power lines, and north-east from Sniperley Hall. A connection heading east, just north of the proposed link road, is shown as pedestrian only, whereas in the previous iteration of the Design and Access Statement this was shown as a cycle route (though it is probable that that version was mislabelled).

- The key on the separate Movement Hierarchy Plan labels the purple-dotted routes as pedestrian only, and the orange-dotted routes as shared pedestrian/cycle routes. It seems likely that the key is incorrect. Interchanging the two would bring this plan into consistency with the Design and Access Statement and the covering letter.
- The Adoptable Highways Plan, however, only shows two adoptable cycle paths linking to the County Durham Land site: that alongside the link road, and that through the space under the pylons. The link at the north end of the site, and the route north-east from Sniperley Hall are both shown as “adoptable pavement in open space”, but the widths may be 3m and therefore suitable for shared use.

As the Adoptable Highways Plan is the only one of these four documents which might be described as being of engineering quality, the Trust would like to see it corrected and resubmitted before the application is determined.

Missing connections

Two of the cul-de-sacs in the northern end of the site do not have adoptable connections onto the adjacent path.



In the area outlined in blue, there appears to be a path connection, but it has not been coloured as adoptable, in contrast to connections from other streets.

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In the area outlined in purple, however, there is no path connection. The Trust would like to see this remedied, and if a revised Adoptable Highways Plan is required in order to deal with the inconsistencies, this amendment could be requested at the same time. Otherwise it should be secured via a condition.

North-eastern boundary route

The covering letter states (section 2a) that “the pedestrian and cycling connections have been revised to provide a continuous surfaced route along the north-eastern boundary” and that “additional connections into the adjacent application site have been incorporated”.

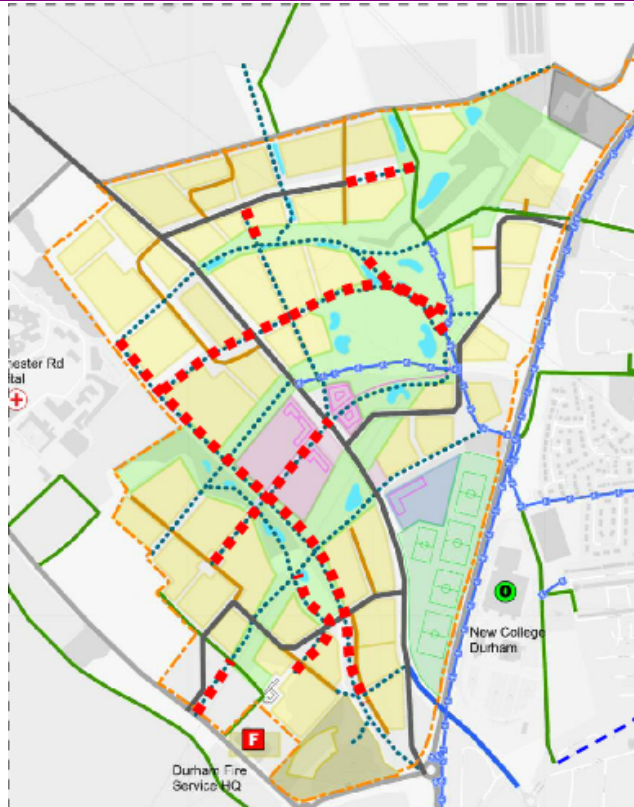
On comparing the Adoptable Highways Plan, Design and Access Statement and Movement Hierarchy Plan with the previous iterations:

- no additional connections to the adjacent application site have been provided, apart from recategorising one path as cycling in addition to walking;
- there is no continuous surfaced route along the north-eastern boundary.

There are two improvements to the paths on the north-eastern side of the site. The link north-west from the overhead wires has been widened to 3m and possibly redesignated as shared use (see above). An additional pedestrian-only path is routed from the overhead wires towards the Park and Ride site. It is perhaps this path which the covering letter is referring to.

The DCC Adopted Masterplan envisaged a network of direct cycle and walking routes permeating the whole of the allocation. Page 41 of the Masterplan refers to the Healthy and Active Travel Connectivity Plan (HATCP) for the routes to be implemented. On the following excerpt from the HATCP we have overlaid with red dashed lines 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. You will see that a significant active travel route was envisaged **along the north-eastern boundary** of the Bellway site, enabling direct and convenient access to the Park and Ride site and the existing cycle and pedestrian network on the A167. This route extended into the County Durham Land site, with comprehensive connections.

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Importantly, this would have formed part of a coherent network which would have met the requirements of Policy 5 and NPPF paragraph 112a.

The penultimate paragraph of CDP Policy 5 requires “convenient, safe and high quality bus, pedestrian and cycle routes within, and connecting to, adjoining facilities”. This is supported by NPPF paragraph 112a which requires developments “give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas”. The DCC Masterplan principle 10 requires “a sensitive movement network that promotes active travel over the use of cars”. The Sniperley Health Active Travel Connectivity Plan (HATCP) 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 following diagram shows what is actually proposed for dedicated walking and cycling routes on this axis. We have traced over the Adoptable Highways Plan. Black lines indicate what are thought to be cycle and walking routes (assuming the aforementioned inconsistencies are resolved), and green indicates pedestrian-only routes. The connections to the Park and Ride are at the bottom of the diagram. The road network has largely been omitted for clarity. At the northern end of the site, a short link remains walking-only, and so the black line detours via the road network to show how a cyclist

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theoretically could access the connection through to the County Durham Land site.

The yellow lines indicate the network envisaged in the DCC Masterplan.



It can be seen that the applicant's proposed path network is very much less direct within the site, particularly for cycling, and offers very poor links to the adjacent holdings of County Durham Land. These paths may be attractive for leisure, but they are not “convenient, safe and high quality ... pedestrian and cycle routes” or a means to “give priority first to pedestrian and cycle movements”.

The cycle route from the Park and Ride site, which initially follows the internal road network, has five crossings over side roads. Despite NPPF para. 112a and the Key Design Principles of the HATCP, priority at crossings has not been given to pedestrians and cyclists.

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Good cycle access is particularly important to delivering sustainable travel options as the Transport Assessment reveals that most amenities are beyond the typical 2km walking distance.

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.

It would still be possible to provide the key spine route along the boundary, either within the Bellway or the County Durham Land holdings, without requiring major changes to the Reserved Matters application under consideration. It is essential to resolve how the spine route is to be delivered if the Sniperley Park site is to be one “incorporating sustainable development principles” (Policy 5 para. 2) and “connected to the existing development to the east of the A167 through suitable, convenient, safe and attractive cycleways and footpaths” (Policy 5j) with “attractive and safe links between the housing and the existing Park and Ride facility” (Policy 5k) which “reduce the dominance of car traffic and improve the permeability [by incorporating] convenient, safe and high quality ... pedestrian and cycle routes within, and connecting to, adjoining facilities” (Policy 5 penultimate paragraph).

The DCC Masterplan is in conformance with NPPF para. 104(c) which requires that “opportunities to promote walking, cycling and public transport use are identified and pursued”.

The Planning Authority should continue to pursue the creation of a well-designed and comprehensive network which gives “priority first to pedestrian and cycle movements” (NPPF para. 112a) by refusing planning permission for the plans as currently submitted and seeking the relatively minor changes that could transform the active travel access.

Yours sincerely

John Lowe,

Chair, City of Durham Trust