

# THE CITY OF DURHAM TRUST

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18 September 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: development of 368 dwellings, associated access and works, and demolition of former farm buildings (resubmission)(further information).**

The City of Durham Trust notes further updated documents relating to the above application, but maintains its objection to the application for the reasons detailed in our letters of 8 June 2023 and 14 June 2023.

## **Updates to application**

The new documents have dealt with two minor aspects of the Trust's objection:

- The Adoptable Highways Plan now correctly colours a link from a cul-de-sac to the path network as adoptable path. This was noted in the Trust's letter of 8 June at the foot of page 2.
- The Adoptable Highways Plan now includes a direct route for pedestrians to cross one of the side roads. This issue was raised in the Trust's letter of 14 June in the lower half of page 13.

The rest of the Trust's detailed reasons for objection remain unaddressed.

The Adoptable Highways Plan, when it was resubmitted in August, was adjusted in various ways, including repositioning a number of car parking spaces. It is therefore particularly disappointing that issues which the Trust highlighted remain unaddressed, including:

- The link through to the County Durham Land area at the north end of the site being designated pedestrian-only on the Adoptable Highways Plan (see the Trust's letter of 8 June 2023, pages 1-2).
- The design of pedestrian and cycle crossings of side roads not giving priority to pedestrian and cycle movements. The designs may conform with the Design Manual for Roads and Bridges, but they do not comply with Manual for Streets 1 & 2 or LTN 1/20, and do not support the NPPF para. 112 requirement to "give priority first to pedestrian and cycle movements". See the Trust's letter of 14 June pages 10-12.

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These issues could have been dealt with by the developer without affecting the basic layout of the scheme.

## **Phasing of the scheme**

The Trust objects to the implications of the Phasing Plan which has now been provided. Assuming that the phases are to be constructed in numerical order, the main delivery of housing will be in Phase 2. But until Phases 3a and 4a are delivered, the key sustainable travel route to the Park and Ride bus stops may not be available to residents.

The Trust would prefer to see the areas shown as Phases 3a and 4a to be prioritised over those parts of Phase 2 which are north-west of the overhead wires and the main access road. This will maximise the uptake of sustainable transport options. The most opportune moment for people to change their travel habits is when moving house, and if the Phase 2 houses remain unconnected to the Park and Ride site for a prolonged period, this opportunity will be squandered.

Pages 22 and 23 of the Trust's letter of 14 June anticipated this issue. The Trust suggested the following condition be applied:

‘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.*

If the conclusion of officers is that the application should be recommended for approval, the Trust would wish to see a number of additional conditions:

- to ensure the timely provision of bus services entering the site.
- to give priority over side roads, where possible, for the main shared-use pedestrian/cycle paths via appropriate engineering methods such as continuous footways, tight corner radii, or raised junction tables.
- to redesign the A691 roundabout access to the site to prioritise the A691 cycle route via crossings conforming with LTN 1/20.
- to increase footway widths to 2.0m.
- to provide LTN 1/20 compliant crossings of the A691 and A167 Park and Ride roundabouts, and of the main Sniperley Roundabout (the last is possibly already included in the applicant's proposals).

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- to make the proposed upgraded route to Framwellgate School conditional on further design iterations in order to comply with LTN 1/20 throughout the length of the route.

## **Sustainable Levels of Car Parking**

The applicant has submitted a memo dated 15 August 2023 to justify the underprovision of car parking spaces relative to the emerging Parking and Accessibility SPD.

The SPD, and the previous 2019 Standards, define requirements for a dwelling based on the number of bedrooms. The Trust has not been able to locate a clear summary of the proposed numbers of 3-bedroomed houses, 4-bedroomed, etc. which would have allowed a quick calculation of the expected numbers of car parking spaces, and nor has the applicant provided this in the memo.

The applicant points out that the car parking proposed exceeded the requirements of the Council's 2019 Standards. The reason there is an underprovision relative to the latest draft of the emerging SPD is that, on the basis of very little evidence, the Council has increased the requirements substantially. The Trust has responded to each stage of the SPD consultation, and has offered evidence based on the 2021 census data to support a reduction in the car parking requirements. The Trust proposed three different scales of provision to suit different zones in the county, and an arrangement where the total number of spaces could be varied depending on the balance chosen between in-curtilage provision and unallocated shared parking, which is more efficient in land take, as noted in Manual for Streets.

The Trust calculates that if the County Council's car parking rates in the SPD could be applied retrospectively to the county's current housing stock, it would result in an over-provision of in-curtilage parking spaces of 47%, enough space for 10,000 homes.

The Trust therefore supports the applicant in arguing that compliance with the rates given in the emerging SPD should not be required.

The Trust notes, however, that the shortfall in spaces relative to the emerging SPD is much more significant for visitor (or unallocated) spaces. The Trust would support increasing the proportion of visitor spaces and reducing further the in-curtilage provision, along with measures to reduce the land required for car parking by making use of Park and Ride spaces overnight. See the Trust's letter of 14 June, pages 15-16.

## **Active travel measures**

The aforementioned memo quotes from the Council's Spatial Strategy Justification Document which made the case for the green belt land release. This document argued that locating housing in Durham City would maximise the use of sustainable modes of transport.

The Trust has consistently argued that the Sniprley development could never result in a shift to sustainable transport modes without considerable upgrade to the walking and cycling network, prioritisation of bus access, and design measures to reduce car use. The applicant claims that almost 5km of on-site walking and cycling routes will be provided in the Bellway application alone, connecting to 2km of upgraded cycle-routes off-site. The Trust can only reach the 5km total by including all the pavements. The upgraded off-site routes include a considerable stretch of the A691 which is unlikely to be used by many residents of the development for daily journeys, as it heads out of the city towards Witton Gilbert.

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Obviously the applicant is keen to promote the sustainable credentials of the application in order to justify the shortfall of car parking spaces against the emerging SPD. At earlier stages in the planning process, when the applicant's car parking proposals exceeded the County Council's 2019 Parking and Accessibility Standards, no justification was given for this.

Active Travel England has now issued its planning application assessment toolkit. The "light touch" version gives a pass/fail score for a number of indicators. The Trust considers that the application fails a number of criteria. These are listed in the appendix. The Trust has highlighted all these issues in its previous responses.

The Trust continues to maintain that the application does very little to promote sustainable transport to the extent that would have justified the green belt land release.

Yours sincerely

**Sue Childs,**

Vice Chair, City of Durham Trust

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## Appendix: Active Travel England criteria

Criterion	Description	Trust response
ATEPAF_102 Transport Assessment: qualitative analysis	Transport Assessments must provide a qualitative analysis of the current infrastructure of the surrounding area, taking into account how additional movements across all modes of transport will impact upon the capacity of public transport, walking, Wheeling & cycling networks	The Transport Assessment does not evaluate the crossings provided for walking and cycling access to the surrounding area. The local cycling map is reproduced but there is no evaluation of quality.
ATEPAF_104 Walking routes to a primary school	A high-quality walking connection should be provided (or already exist) from the site to a primary school. Refer to Manual for Streets and CIHT Designing for Walking for details ...	Upgrades to the walking route to Framwellgate Moor Primary School are proposed, but a safe crossing of the A691/A167 Park and Ride link is lacking, and of the B6532 at the Blackie Boy roundabout. A new primary school is proposed in the adjacent outline application area, but it is not clear if there will be a suitable crossing of the B6532 or if the footpath link will be lit.
ATEPAF_105 Walking routes to a food shop	A high-quality walking connection should be provided from the site to a food shop selling fresh fruit & veg or services which benefit the community e.g. medical services. Refer to Manual for Streets and CIHT Designing for Walking for details ... As a minimum routes must be 2m wide (with limited pinch points of 1.5m due to street furniture) ... include appropriate crossings in compliance with LTN 1/20 Table 10-2	Route is not 2m wide (footways within the site are following DCC guidance of 1.8m width). Crossings of A691/A167 Park and Ride link road and Blackie Boy roundabout are uncontrolled and do not comply with LTN 1/20 Table 10-2.
ATEPAF_107 Safety at junctions (off-site)	All new or improved off-site junctions should be designed in line with the movement hierarchy: pedestrians, followed by cyclists, public transport users and private motor vehicles.  The Junction Assessment Tool	The A691 Park and Ride roundabout remains with red movements in the JAT. The A167 Park and Ride roundabout may be upgraded in conjunction with the neighbouring application, but will still lack one suitable crossing. The applicant

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	from LTN 1/20 should be used for the design of all junctions except priority junctions between minor roads with flows below 500vpd.	proposes a contribution to improvements at the A691/A167 Sniperley Roundabout but this currently has multiple 0 scores in the JAT and the nature of the upgrade is unclear.
ATEPAF_108 Cycle routes to key destinations	The development should provide off-site LTN 1/20 compliant routes to relevant destinations such as schools, local centres, employment centres, railway stations and the existing cycle network.	Cycle routes to local centre at Framwellgate Moor, employment at Aykley Heads and Durham city centre are not compliant with LTN 1/20. The proposed improvement to the route to Framwellgate Moor Primary School is also non-compliant in part.
ATEPAF_110 Crossings (external to the site)	Where appropriate, the provision of crossings to an appropriate type and specification must be provided along forecasted desire lines.	Non-compliant crossings include A691/A167 Park and Ride link, Blackie Boy roundabout, Sniperley roundabout.
ATEPAF_114 Walking routes to nearest public transport nodes	A high-quality walking connection should be provided from the site to a public transport node.	Footways are proposed to be 1.8m wide, so not compliant. There is no compliant crossing of the A691 to the west-bound bus stop. Proposed bus stops on the site are accessible, but delivery depends upon the approval and construction of the adjacent site.
ATEPAF_121 Through traffic	The site accesses must be arranged to prevent private vehicle drivers from using the site as a shortcut while undertaking longer journeys ...	Depending on congestion levels on main roads, the proposed link from the B6532 to the A691 through the site may allow for use as a shortcut. The Trust suggests use of a bus gate.
ATEPAF_122 Safety at junctions (internal to the site, including site accesses)	<p>All new or improved off-site junctions should be designed in line with the movement hierarchy: pedestrians, followed by cyclists, public transport users and private motor vehicles.</p> <p>The Junction Assessment Tool from LTN 1/20 should be used for the design of all junctions except priority junctions between minor roads with flows below 500vpd.</p>	Side roads have no junction treatment. Radii exceed those recommended in MfS and MfS2. The proposed new access roundabout on the A691 has a JAT score of zero.

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ATEPAF_131 Travel Plan	Travel Plans / Framework travel Plans must clearly outline the modal share targets, proposed measures, monitoring strategy, and the remedial measures in the event these are not met.	Remedial actions and measures are limited to promotional work. Travel Plan targets allow for a higher car modal share than found in neighbouring residential areas in the 2011 census.
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