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Belmont
Durham, DH1 1TH
6 June 2024

Steve France
Planning Development Strategic
Room 4/86-102
County Hall
Durham City
DH1 5UL

Dear Mr France,

DM/24/01173/FPA BAM Construction Ltd St Leonards Catholic School North End Durham DH1

Demolition of existing school buildings and development of a replacement school building and works to the retained Springwell Hall, along with car parking, hard and soft landscaping including works to trees, replacement playing pitches, and access arrangements.

The Trust is acutely aware of the wishes of the pupils, parents, and staff of St Leonards to bring to an end the temporary arrangements caused by the RAAC failure. That fast-track building technology has proved to be a great mistake, and the new school must stand the test of time. Accordingly, the Trust welcomes the progress that is being made in coming forward with a planning application with sufficient detail to be able to determine whether there are any built-in problems. We have examined the proposals closely and regret that there are a number of issues. In normal circumstances the process of consultation enables such issues to be brought to the attention of the applicant at a formative stage but, given the sense of urgency that is felt on all sides, any problems must be highlighted right now, or the current application will be approved quickly and unchanged. For this reason, the Trust considers that it must formally object to this application. This is of course not an objection to the building of a new St Leonards School; notwithstanding the pressure to rehouse pupils in new buildings, this represents an opportunity to create a prominent building in the conservation area that will be standing for a substantial number of years and must not suffer problems that people in hindsight ask why nobody pointed out these problems at the time.

What is needed is a building of high quality that functions well for users and local residents, and is appropriate for the historic environment. The Trust considers that the proposals fail in relation to location and design, transport and circulation, and landscaping and biodiversity. The application process has been confusing and has led to allowing the felling of trees by default before the proposals that create the need to fell have been fully considered or approved. This does not lead to any sense of cooperation with the local community and undermines the already limited and rushed consultation process. It is difficult to see how this delivers on the requirements of National Planning Policy Framework Paragraph 137 quoted in the Planning Statement:

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“...Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.”

Specific Issues are as follows:

1. Location and Footprint

Early design decisions have pushed the footprint of the new principal block both northwards and westwards. This has consequences for circulation beside the northern access road and subsequent tree removal and scope for new landscaping. It has increased the impact on neighbouring properties, particularly Springwell Hall Cottage. The new building is pushed into much greater contention in the conservation area when viewed from the main access on Fieldhouse Lane. There is a partial reduction in the view of buildings from the supplementary access to the south of the main access, but this is lost in the increased mass and height of the new build. The constraints of creating a school of this size on a small site are clear.

It would seem that avoiding increased impact on neighbouring properties and the conservation area have not been respected in identifying parameters for the new build. It has also led to poor circulation and reduced landscaping in the submitted proposals. The focus seems to have been upon the interior campus area.

2. Design

While the detail of the key facades and use of brick are sound when viewed in isolation the extent of the facades and repetition of windows lead to the creation of a bland exterior that loses this benefit. The impact is of a large institutional building with long unbroken facades thrust into public view on Fieldhouse Lane and from neighbouring properties. The impact is increased by the height of the proposals. This is not a positive benefit to the conservation area and fails against County Durham Plan and Durham City Neighbourhood Plan policies. The scale and mass of the building lead to it being intrusive. This damages the distinctiveness of the conservation area. In order to assimilate it there needs to be greater attention to reducing the apparent scale and mass of the building to fit into the grain of the surroundings and the conservation area.

3. Transport Statement and Travel Plan

Some aspects of the submission are good: for example, page 13 of the Travel Plan notes difficulties for pedestrians in crossing the County Hall roundabout, but assessment of the cycle network on the same page is scanty. There is, however, a key omission in the Transport Statement: the existing and acute traffic issues resulting from high levels of car-based pick-up and drop-off for pupils. This is well described by Cllr. E. Scott in her written response to the application:

‘North/South Crescent (close to the site in question) is a narrow winding road where the pavements and road surface take a lot of heavy traffic and are currently awaiting resurfacing. Residents and visitors are forced to park their cars on the road and when necessary (to keep the flow of traffic moving), they park half on the pavement. Furthermore, residents are plagued daily by school traffic and illegal parking making it nigh on impossible to enter or leave the street during school pick-up/ drop-off times. Parents regularly park on double yellow lines and block driveways and the police and neighbourhood wardens have been involved on many occasions.’

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If such impact were predicted for a new development or for an application for change of use, such issues as endemic footway parking in an area so close to a school would certainly be considered an “unacceptable impact on highway safety” and the cumulative impact on the road network of the observed peak time congestion would be judged “severe”. This would mean that the development could be refused on highways grounds alone (NPPF para. 115).

Local residents, either in response to the planning application or the applicants' consultation exercise, have made suggestions for dealing with the traffic issues. The Trust considers some would be impractical: an area for parents to drop off pupils within the school site will not improve the traffic situation. Others merit serious consideration, such as the suggestion for school buses to access the site exclusively from the North Road approach, to avoid the daily procession of large diesel vehicles through the residential area round Fieldhouse Lane. As respondents point out, this is a once-in-a-generation opportunity to address the existing problems.

Would it be right for the Planning Authority to overlook these issues on the grounds that the proposed application will not be making things any worse? The Transport Statement should surely not be silent on the current issues, but should identify measures to deal with them, and provide justification if the application is to be approved without any mitigating interventions.

Moreover, the Planning Statement (para 3.5) notes that the layout has been designed with out-of-hours community use in mind. Page 10 of the Travel Plan states that use of the building is expected to change, to be open for community use from 06:30 to 19:00. Community use is to be welcomed, but there is no assessment as to whether any community use would have an impact on the local highways. This must be addressed.

The Travel Plan states that there is no information available on current travel to the school and suggests using the 2011 Census travel to work data as a basis. The Trust is aware of travel survey data for St Leonards from 2014 and 2015 which was provided through a Freedom of Information request in 2019.¹ This gave proportions of around 5.5% active travel, 65% bus, and 29% car travel to the school by pupils. It should have been possible for the applicant to have submitted a better-evidenced Travel Plan draft. When the school conducts further surveys, as promised in the Travel Plan, attention should be given as to the reasons why parents choose to drive their children to school. The Trust knows of cases where pupils come from areas not served by school buses, and where the service buses are not dependable: there have been driver recruitment issues, and some services also serving New College are full, leaving pupils stranded. The school should demonstrate a real commitment to understanding the causes and produce plans to address them. A condition should be applied to require a regularly-revised Travel Plan in perpetuity, which delivers modal share targets consistent with local and national objectives.

A full analysis of all these issues could lead into identifying where actions by the school and the new layout, car, cycle, and bus provision may help to reduce this impact. It could have led to a stronger reappraisal of where the key access points should be and who should use them. If there are implications for the County Council and scholar bus service providers that are outside of the scope of the application, the need should nevertheless be noted, and the scope justified.

1 https://www.whatdotheyknow.com/request/methods_by_which_children_travel

4. Car Parking

Currently cars seem to use internal footpaths, unmarked spaces, the bus drop off zone and hatched no-vehicle areas. These sorts of issues are not new: application 4/07/01139/FPA, approved in 2007, noted that staff were parking on footpaths, bus loading bays, and grass verges. This was used to evidence unmet demand and justify converting part of the playground to provide an additional 24 parking spaces using a shared Fieldhouse Lane access. The impact on residents of Fieldhouse Lane was also acknowledged. The Trust draws attention to this as there is no submitted evidence on how car parking is currently used and whether there are remaining problems. In particular it is not clear that all spaces are currently used in the Fieldhouse Lane additional car parking area.

The Parking and Accessibility SPD suggests as a baseline provision of 1 car parking space per member of staff for schools. It is not clear why schools and FE/HE colleges are the only employers where a 100% rate is thought appropriate, especially as such establishments are almost always in accessible locations: the Trust criticised this policy in its response to the 2023 consultation. The SPD does allow for a lower rate of provision in accessible locations. St Leonard's School is highly accessible, being served by 17 buses per hour (according to the Travel Plan p. 13-14), including long-distance routes, and being within walking distance of the railway station and bus station. It would thus be justifiable to provide a lower rate of car parking.

The nearby Durham Johnston School, in a much less accessible location with few public bus services, has 134 staff car parking spaces, and a maximum of 219 staff on site at the peak (information provided by a school administrator, 2023). The rate of provision there is 61%. Car sharing, bus use, walking and cycling are among the modes of transport used by staff.

The applicant's Travel Plan quotes the 2011 Census Travel to Work data for the Lower Super Output Area in which the school is located. The proportion of people travelling to employment in the area by car, either as a driver or passenger, was 56%. Given the need to reduce car travel, recognised by the County Council's Climate Emergency Response Plan 2, a Travel Plan should be aiming to improve upon this modal share. Therefore, a target of nearer 50% would be considered appropriate.

The application gives the numbers of staff who are full time (97) and part time (48) but does not indicate the maximum number of staff likely to be on site at any one time. Even assuming all staff are present simultaneously, a 50% rate of provision would require only 73 car parking spaces, rather than the 103 proposed.

Maintaining a high level of car park numbers (103) has an impact on the retention of trees along the northern access road and allowing scope for replanting. If the car parking could be reduced it would open the way to reconsidering landscaping to minimise impact on adjacent properties and views into the site. Specifically, more trees could be added to soften and eventually screen the new building.

Benefit in removing buildings and exposing the lodge and Hall entrance view is identified. However, the car park interferes substantially with this view, reducing that benefit.

5. Cycle Parking

Page 15 of the Travel Plan states that there is currently no cycle parking. The Parking and Accessibility SPD requires a minimum of 1 long-stay cycle parking space per 20 members of staff, and 1 for every 10 pupils. This would equate to 8 for staff and 148 for pupils. Short-stay visitor spaces would be in addition. Although the provision has been discussed with the school, the 60 new cycle spaces seem low, and certainly do not comply with the SPD. If there are any factors justifying this reduction, such as the school's catchment area, they need full explanation.

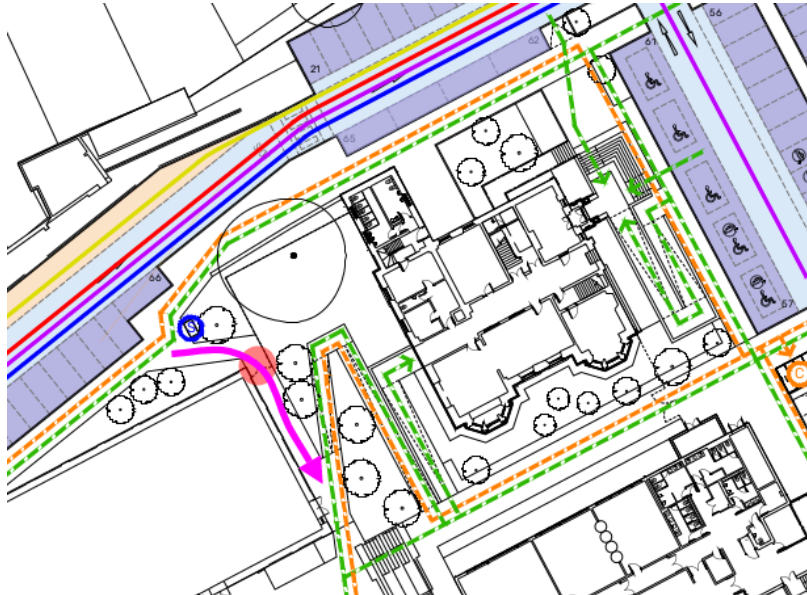
The Trust notes that the main cycle parking area, remote from the entrance to the site, is proposed to have 36 spaces and capacity for expansion, but the space indicated will only accommodate about 20 more. Given the low rates of cycling found in the 2014 and 2015 surveys, initial provision of fewer than 148 student spaces could be acceptable if the Travel Plan includes a commitment to increase the numbers as needed, and the space to accommodate 148 is identified and reserved. The Trust considers an acceptable starting position would be 8 staff, 8 visitor, and 74 pupil spaces, making 90 in total.

The main cycle parking could hardly be located more inconveniently for users. This must be rethought.

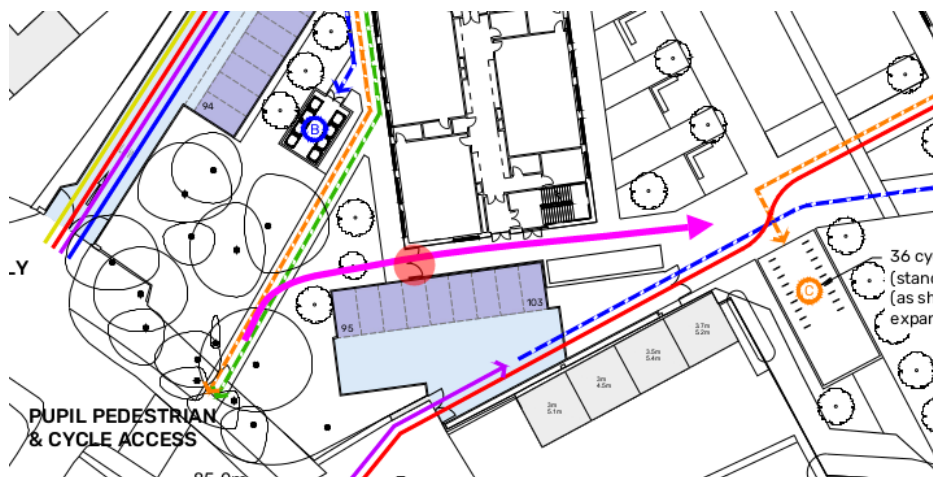
6. Circulation

These comments are based upon drawing *DM_24_01173_FPA-CIRCULATION_STRATEGY-3574561.pdf* and the single security access policy is described in the *Planning Statement, Para. 8.15, Bullet 2*. The access point can be determined from the circulation strategy. There are significant failings in the proposed pedestrian and cycle circulation. Pedestrians and cyclists are channelled together around the site; it is difficult to see this working when pupils are concentrated together at key times. The insistence on single point entry for security leads to pedestrians entering via the Fieldhouse Lane entrance being channelled around the site beside the northern access road, to the east of Springwell Hall, and back into the central campus area. Although the main cycle provision is close to Fieldhouse Lane, cyclists are forced onto this circuitous route with the pedestrians. This includes up the internal access ramp and its dog leg to the main entrance forecourt and then across the forecourt. This is overwrought and the conclusion is that more than one security entrance is required. This could have resulted in splitting the cycle provision between North Road and Fieldhouse Lane entrances and taking cyclists out of the centre of the site and off the northern access road. This could have been applied to pedestrians also.

Two excerpts are given. In the first we see the access from the Fieldhouse Lane direction, and from the bus drop-off bays, circling Springwell Hall, rather than using the more direct route (added in magenta) passing through the security gate (highlighted in a pink circle):



In the second excerpt we see that a much quicker route into the inner compound from the Fieldhouse Lane direction could be made available through the security gate (highlighted in pink). This would also provide a much better route to the main cycle parking, which is otherwise highly inconvenient to access:



These two excerpts show that better pedestrian circulation is clearly achievable. The plans should be revisited with an admission that additional security entrances are needed. More attention to the needs of the 35% of the pupils who will enter the site on foot would have resulted in more direct routes and might well have reduced the necessity of running a combined path alongside the entire length of the northern access road with its consequent tree loss and minimal replanting space. The solutions chosen appear over-engineered and unworkable and lead to greater impact on neighbouring properties. Safety for pedestrians vs cyclists would have been improved.

7. Landscaping

The new planting is at its weakest where the impact of the new building is at its greatest. The cumulative impact of the footprint of the building, car parking provision and combined walkway is to restrict planting. Trees are reduced to fastigiate forms, light crowned medium sized trees

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and small trees/large shrubs. This is no replacement for the trees lost. It is instructive that the landscape plans include existing trees outside of the site. Planting at a standard size will have little or no short term impact, while their later growth may be improved over a planting of larger specimens, this need not be the case with care in planting techniques. The standard size can be vulnerable to damage in pressured environments.

It should be acknowledged that school grounds are high intensity use areas and planting is often difficult to establish and maintain. The perennial planting and meadow grassland may well prove difficult to establish and maintain. There are issues with the hedge mix where spiny plants are incorporated next to walkways. These can be both a nuisance and act as litter traps. Hedges generally are likely to need careful controlling through maintenance because of intensity of pupil usage and restricted space. Overall, the scheme is heavy on maintenance requirements.

The restrictions of the site also lead to doubt that the planting can perform as anticipated for calculating biodiversity net gain and urban greening.

8. Biodiversity Net Gain

As noted, the hedgerow planting will not deliver as desired and should not be considered a native hedgerow. Nor are the replacement trees sufficient to mitigate the loss and additionally to provide the minimum 10% BNG which needs to be achieved for the trees and hedgerow habitat of the site. The 10 year target for the woodland and newly planted trees to deliver gain is also potentially over ambitious. The Ecological Impact assessment on BNG gives the target condition for the new planting as "poor," reflecting "the difficulties in creating and maintaining these habitats in highly urbanised areas" with an expected high human impact. Also, the benefits of the perennial and meadow planting will be difficult to achieve. The Trust suggests that these factors are included in calculating any benefit that may accrue. The official mode of presentation of BNG is abstruse to outsiders but this case did seem to raise the issues identified. If approval is given to this development, It is important that residents are allowed to see and comment on the Biodiversity Gain Plan that the developers must provide to ensure that it is suitable.

9. Conclusion

The need for rehousing pupils permanently may well overwhelm the need to achieve a higher quality building that is required on this site. The proposals need revision to deliver a building that functions well and reaches the necessary quality for a Conservation Area.

Trust has identified basic failings in layout that may well be difficult to mitigate at this stage. It has shown that there are fundamental failings in design and circulation. The basic design and detailing of the outward facing facades of the new build need revisiting with a view to minimising impact on the Conservation Area. There are substantial weaknesses in the landscaping. The Transport Statement and Travel Plan have weaknesses and missing evidence. The Trust suggests that there is an urgent need to reassess the circulation layout, transport, and car parking arrangements. This should then include mitigation and an enhanced level along the northern access road creating greater planting opportunities. The landscape plans should then be revised and greater attention paid to biodiversity net gain.

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As submitted, the proposal fails to achieve the high standards that should be required of this large and prominent building. For these reasons, the Trust submits its objection and will maintain it until it can see substantial improvement in what is being proposed. Policy failures are indicated in the appendix below.

Yours sincerely,

John Lowe,

Chair, City of Durham Trust

Appendix - Policies

The Trust considers that the proposals fail against the following planning policies:

County Durham Plan

Policy 22 Durham City Sustainable Transport

In order to reduce the dominance of car traffic, address air quality and improve the historic environment, the council proposes to deliver the following transport interventions in Durham City:

Demand Management

Encourage modal shift to more sustainable modes of transport by promoting and influencing changes in travel behaviour including: marketing and promotion programmes; employer travel plans; school travel plans.

Policy 29 Sustainable Design

- a. The proposals fail to contribute positively to an area's character, identity, heritage significance, townscape and landscape features, helping to create and reinforce locally distinctive and sustainable communities.
- e. The proposals fail to provide high standards of amenity and privacy, and minimise the impact of development upon the occupants of existing adjacent and nearby properties;

Policy 44 Historic Environment

Conservation Areas

- f. The proposals fail to demonstrate understanding of the significance, character, appearance and setting of the conservation area and how this has informed proposals to achieve high quality sustainable development, which is respectful of historic interest, local distinctiveness and the conservation or enhancement heritage assets.
- h. The proposal fails to show respect for, and reinforcement of, the established, positive characteristics of the area in terms of appropriate design (including, features, materials, and detailing).

Durham City Neighbourhood Plan

Policy S1: Sustainable Development Requirements of all Development and Redevelopment Sites Including all New Building, Renovations and Extensions

The proposal fails because it does not:

- c) Harmonise with its context in terms of scale, materials,
- d) Conserve the significance of the setting, character, local distinctiveness, and the contribution made to the sense of place by Our Neighbourhood's designated and non-designated heritage assets.

Policy H2: The Conservation Areas, Durham City Conservation Area

The development proposals negatively affect the Durham City Conservation Area by not taking into account, and meeting, the following requirements:

- g) protecting important views of the Durham City Conservation Area from viewpoints within the Conservation Area; and
- j) Having, materials and detailing appropriate to the vernacular, context, and setting; and
- k) Using high quality design sympathetic to the character and context of the local area and its significance and distinctiveness.

- l) The design fails to avoid adding to the cumulative impact of the school development and it dominates by scale, massing and uniform design.

**Policy T1: Sustainable Transport Accessibility and Design
Accessibility**

Approach routes to the site and access within the development should be accessible to all, giving the highest priority to walking, then cycling and public transport, and should meet the travel needs of people with mobility impairments.