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

28 May 2025

Mr Callum Harvey
Durham County Council Planning Department
PO Box 274
Stanley, Co. Durham
DH8 1HG

Dear Mr Harvey,

DM/25/01083/FPA – Land To The South Of Cockhouse Lane, Ushaw Moor, DH7 7PN

Erection of 158 homes with associated landscaping and infrastructure.

Summary

The Trust objects to this application on the following grounds:

- failure to provide an adequate Design Code analysing the best of local examples and generating a distinctive layout and house types
- use of gas boilers, with the likelihood for expensive retrofitting unless heat-pump ready radiators and hot water cylinders are included (CDP Policy 29(b))
- no evidence that housing orientation has been optimised for solar gain and to avoid overheating (CDP Policy 29(b,c))
- inappropriate mix of housing types (CDP Policy 19, County Durham Building for Life SPD section 4)
- low density of development (CPD Policy 29(p)), making ineffective use of land (NPPF para. 130), and discouraging sustainable transport (NPPF section 9)
- significant sustainable transport deficiencies of the proposals (see below)

The bulk of the detailed objection below relates to sustainable transport failings. As noted in the DCC Climate Emergency Response Plan 3, p. 48, “a key challenge for meeting net zero targets is influencing user behaviour and encouraging modal shift from use of the private car to more sustainable modes of travel”. Accessibility of new development is a major factor in determining transport modal share, and this development does too little to buck the trend of ever-increasing dependency on private cars. The Transport Assessment provides a vision to lead the sustainable transport proposals in the application, but it is clear that this is an empty exercise which has not influenced the design of the development.

As well as greenhouse gas emissions, over-reliance on cars leads to direct harm through death and injury in road traffic collisions, air pollution and its associated long-term health impacts, noise pollution, and serious health conditions associated with immobility and lack of physical exercise. Accommodating car-based lifestyles leads indirectly to pressure on the landscape from road building, and the hollowing out of town centres through competition with out-of-town

retail. Economically, car-dependent conurbations are less productive, less attractive to inward investment, and funding is abstracted from the local economy because of the cost of fuel, vehicles and finance.

The planning policy grounds for objection, evidenced in the remainder of this letter, include:

- lack of vision-led approach to transport proposals (NPPF para. 109)
- dubious methodology for estimating the vehicle trip generation of the development, which is likely to understate the impact on the highway network (CDP Policy 21(c))
- inadequate audit of cycle access in the Transport Assessment (CDP Policy 21(a,b))
- inadequate cycling provision and connections within the site and beyond (CDP Policy 21, NPPF section 9)
- a large number of criteria which the Trust has scored as “critical” or “concern” within the Active Travel England assessment toolkit for walking and cycling, including serious issues with the Travel Plan (CDP Policy 21(a,b))
- poor car parking design (County Durham Building for Life SPD para. 11.5, County Durham Design Code SPD)

In view of the significant policy failures, most of which could easily be avoided on a green-field site by better attention to design, and because of the significant weight which should be attached particularly to reducing transport emissions, the Trust asks for the application to be refused. If approved, a contribution towards cycle infrastructure linking Ushaw Moor and Durham City would be necessary to make the application acceptable in transport terms.

The following sections set out in detail the justification for the Trust's objections.

Design

The design analysis submitted as a part of the Design and Access Statement offers nothing to generate a distinctive development and does not constitute a Design Code. It is based in all but one instance on recent housing that in turn has evolved little from ubiquitous volume house building types. The analysis of the six different “townscapes” within Ushaw Moor identified by the applicant is not informed by the County Durham Design Code SPD. Nor does it translate into any indication of design intent for the proposed houses. Standard house types offer nothing but similarity to many other larger housing developments.

There needs to be a greater correspondence between actual housing market need and those proposed. (See the section on Density below.) The preponderance of detached houses is forced and creates a dull and repetitive layout. Correcting this also needs to ensure the affordable housing units are not concentrated, causing social division. Building on a greenfield site such as this needs more effective layout and landscaping than demonstrated in the current proposals.

Using need and density it is possible to create a design vocabulary that related to the older housing in the area. This should have been incorporated into a proposal that created more interesting house designs and avoided a layout with house types that can be found almost anywhere in the UK. Distinctiveness is completely absent in the submitted design.

It should have been a requirement that any urban extension on this site needed to be assimilated into the surrounding landscape to improve the setting to the existing settlement. The landscaping is formulaic and it is pushed to the site boundaries. This offers little for the new residents, especially where the largest southern section is taken up with SUDS provision.

Interior landscaping is minimal caused by the persistence of detached house types and multiplicity of drives. The planting shown is inadequate in relation to the site proximity of the Area of High Landscape Value. It is also overly regular in its planting pattern.

The landscape layout needs to be more closely related to functionality and relationship to site context. This includes the following:

- including well-defined east/west connections through the proposals linking to the historic village and capable of onward linkage if further development were to be considered, ensuring that effective assimilation into the local landscape is included;
- ensuring that the landscaping performs fully for the residents;
- ensuring adequate and legible footpath (and cycling) linkages are incorporated into the layout and landscaping in support of accessibility;
- integration of car parking and house drives into a design solution avoiding streetscape domination of parking.

Sustainability of the housing

The Trust objects to the proposal to heat the houses with gas boilers rather than installing heat pumps (see the Energy Statement section 5.9). If this is not amended, the Trust would like to see, as mitigation, a condition to ensure that houses are designed ready for heat pumps to be retrofitted, with hot water cylinders and adequately-sized radiators installed from the outset. This would aid compliance with Policy 29(b) to “create buildings and spaces that are adaptable to changing social, technological, economic and environmental conditions”.

The applicant has indicated that photovoltaic panels will be installed, but flue gas heat recovery (FGHR) and waste water heat recovery (WWHR) systems are not to be deployed.

The applicant asserts (Design and Access Statement, p. 62) that

> The design proposals for the scheme will seek to address the most cost effective method of improving energy efficiency, reducing energy demand and reducing the long term carbon emissions of any new development through the optimisation of dwelling orientation aided by good passive solar and thermal design.

There does not seem to be any evidence to back up this assertion. The detailed assessment of overheating risk, required by Building Regulations Part O, is to be carried out at a later stage.

The National Design Guide lists orientation at para. 138 as one of the passive measures to be considered at the top of the energy hierarchy. Rather than maximising the scope for solar power generation and achieving beneficial solar gain, the house orientation is determined primarily by the street layout. This is considered a failure against Policy 29(b) and (c).

Transport Assessment

The Trust welcomes the fact that Milestone, the consultant commissioned by the applicant to produce the Transport Assessment, Travel Plan and Active Travel Plan, recognises the requirement for a vision-led approach to the design of transport solutions in development proposals (NPPF para. 109). Paragraphs 1.8 to 1.12 of the Transport Assessment set out the vision, and para. 1.9 lists the key principles. These include:

- providing a development which is well-designed for pedestrian and cycle movement and is permeable to minimise travel distances to surrounding amenities – the Trust notes the provision of an alternative pedestrian and cycle connection towards Station Road.

- reducing the need for residents to travel by accommodating home working with a fast broadband connection and suitable space in each home – the Trust has examined the

house type plans. In most cases there is open-plan kitchen/dining/living space, meaning the most suitable home working space would be a bedroom. There is no evidence that the designs have been led by the vision in this respect.

- incorporating cycle storage facilities for each dwelling – for houses without garages, the developer offers no detailed plans but suggests in Table 4.3 of the Transport Assessment that garden sheds may be provided. This means that cycle storage, which may need to be accessed daily, will be less convenient than the bin storage which is accessed only weekly. Again, there is no evidence that the design is vision-led.

The other aspects of the vision are insubstantial: “unlock new land for residential development”, “provide electric vehicle charging infrastructure” (as now required by Building Regulations) and to “implement a Residential Travel Plan”.

In short, the vision is unremarkable, has had little influence on the design of the development, and is unlikely to reduce dependence on the private car in accordance with the NPPF. There would be no material change in travel modes.

Sustainability of the location

The applicant cites in para. 2.35 a recent appeal decision APP/X1355/W/23/3334214 for land north of George Pit Lane, Great Lumley, contending that this sets a precedent for the acceptable walking distances from dwellings to bus stops of up to 885m. The Trust disagrees with this interpretation of the decision. The Inspector had stated that walking distances to one set of stops were between 390m and 450m and to another set between 795m and 885m. When the Inspector says “these distances would not be unacceptable”, that could easily be because of the distance to the nearer bus stops, which is close to the ideal of 400m. It is clear that the Inspector was not content with the greater distance of around 800m to the other bus stops, as in the paragraph following that which was quoted he points out that the other service, though more frequent, would only be accessible from the stops which were further off. It is clear that the combination of distance, frequency of service, and destination of the services is what matters to give people a genuine choice of transport modes.

Given that the Inspector judged the frequency and the destinations of the Great Lumley services to be inadequate, and dismissed the appeal, it is not possible to conclude what level of service and choice of destinations he would have expected for bus stops at a 10 minute walking distance (800m).

The CIHT report “Buses in urban environments” (2018) provides guidance on frequency and distance. Table 4 of this publication recommends a maximum walking distance varying between 300m (if services are less than every 12 minutes), 400m (for a single route running at least every 12 minutes) to 500m for bus stops on core bus corridors with two or more high-frequency services.

In the case of this application in Ushaw Moor, there are two pairs of bus stops, each served by a different bus services running at 20 minute intervals. Some of the houses are less than 300m from a single set of bus stops, and the 20 minute frequency would be acceptable. For houses further into the site, some may be at up to 400m distance from both sets of bus stops, but a few will be beyond the CIHT's acceptable distance. The applicant has not provided clear information on this.

The main destination of each service is the same: the bus station in Durham. There is thus quite limited scope for accessing employment in the wider city without changing buses. This is borne out in the low level of bus patronage of 5% in the most relevant 2021 census data (see below for further details).

Where bus services are limited in their destinations, cycling can play a part in widening the reach of sustainable transport options. The Department for Transport's recommended modelling tool, the Propensity to Cycle Tool (https://pct.bike/) predicts that with good cycle infrastructure, 10% of Ushaw Moor commuting journeys would be by cycling (up from 1% in 2021) or even 18% with wide use of e-bikes. But as we will see below, there are no destinations currently accessible outside Ushaw Moor, as LTN 1/20 would judge the provision “suitable for few people”, excluding “most potential users”.

The Trust considers that the opportunities to substitute walking, cycling or public transport in place of the car are therefore currently limited, apart from for accessing amenities in Ushaw Moor, and travelling to locations in close walking distance of the bus station in Durham. The Inspector in the Great Lumley case refers to the 2018 Settlement Study. Ushaw Moor ranks higher than Great Lumley for sustainability, but not by much. The village has a choice of food retail and takeaways, a pharmacy and hair salons, and primary and secondary education. But for employment residents are highly likely to need to travel.

This is not to say that the location cannot be made sustainable. Connecting Ushaw Moor to a good quality cycle network in Durham City would widen sustainable transport opportunities significantly, and bus services could be improved with ticketing interoperability and through services. Other measures within the city could discourage car use, but these are beyond the scope of the interventions which could be linked to this development.

The Trust considers that a Section 106 contribution towards cycle infrastructure linking to Durham City would be necessary to make this site sufficiently sustainable to be acceptable in planning terms.

Highways impact

As is often the case, the main aim of the Transport Assessment seems to be to demonstrate that the impact of the additional vehicle movements generated will not be judged severe. Reference is made to the previous application on this site, and the reasons for refusal, which included the effect on congestion at Neville's Cross junction on the A167.

It is interesting to see how the applicant minimises the impact of the proposals. One major change is the reduction from 210 dwellings to 158, a reduction of 25%. With the revision in housing need methodology, we are likely to be looking for even more housing sites in the near future. It is totally counter-productive to reduce the number of the dwellings to reduce transport impacts, because in doing so the density of development has been reduced, and lowering the density will reduce the attractiveness of active travel.

Secondly, a very questionable approach has been taken for estimating the mode of transport of trips generated. In Table 5.1 of the Transport Assessment the baseline modal split and targets are given. Just looking at the bus and car figures we have:

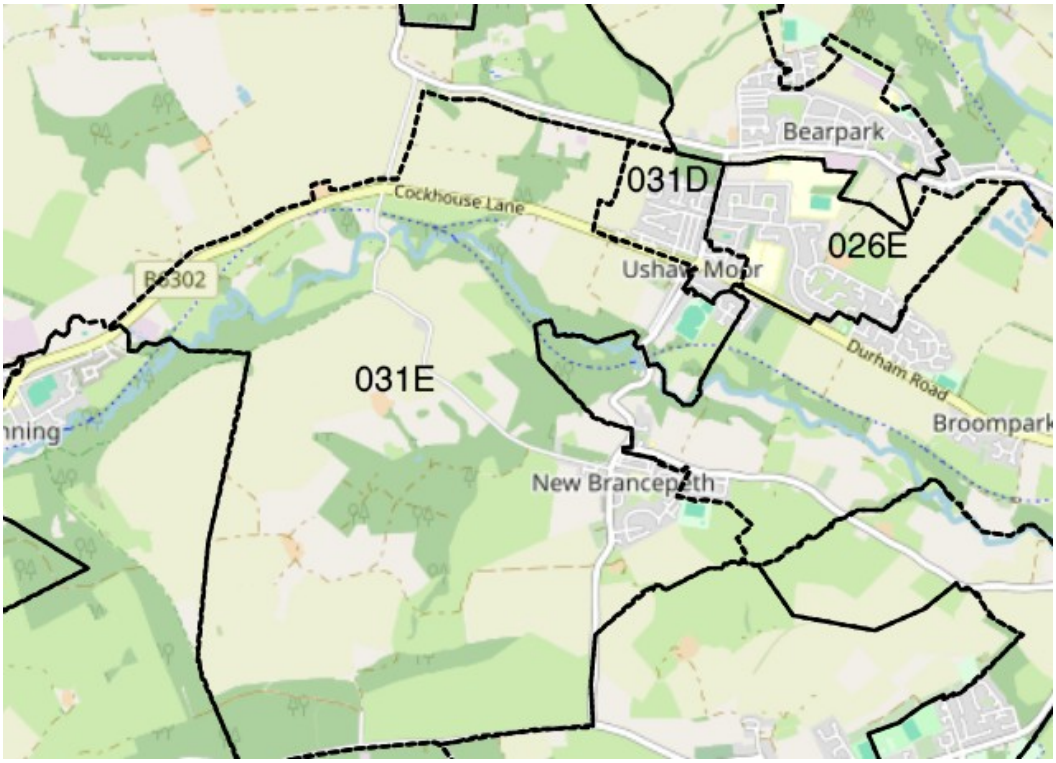
Mode of transport	Baseline modal split	Target	Change
Car driver	66%	54%	-12
Car passenger	9%	12%	+3
Bus	12%	15%	+3

The net reduction in car commuters of 9 percentage points is described as an “ambitious but deliverable target” in paragraph 1.11 of the Transport Assessment.

The baseline modal split was derived from 2021 census data. Table 6.2 of the Transport Assessment compares three Lower Super Output Areas (LSOAs) containing or neighbouring the development site.

Mode of transport	County Durham 031D	County Durham 031E	County Durham 026E
Car driver	77%	68%	66%
Car passenger	9%	11%	9%
Bus	5%	11%	12%

Paragraph 6.6 states that “the comparison exercise shows that there are relatively minor differences between the different mode shares”. This is despite the fact that the car driver share ranges by 11 percentage points from 66% to 77%. Bear in mind that a reduction in 9 percentage points in the travel plan target was described as “ambitious”, yet here such a difference is described as “relatively minor”. Note that the travel plan target proposed a 25% increase in bus patronage as an “ambitious” target, but here there is a more than two-fold difference from one census area to another.



With surprising confidence, paragraph 6.7 explains that “although the modal splits are relatively similar, LSOA County Durham 026E has hereafter been used for the multi-modal trip generation assessment as it better reflects the good bus service provision that the site benefits from”. If the difference in bus patronage is so sensitive as to location that a 100% difference can result, why has the applicant selected area 026E when area 031D is closer to the development site and has more similarities in its bus accessibility?

What is the actual cause of the significant difference in modal share for area 026E? Fortunately we can learn from the 2021 census data for house tenure:

Lower Super Output Area	Social rented properties
County Durham 026E	48.2%
County Durham 031D	14.2%
County Durham 031E	32.2%

The area with the lowest percentage of socially rented properties, which is the area closest to the development site, is 031D with only 14.2% of households renting. The area selected by the applicant for the basis of the traffic predictions is 026E, which has 48.2% of households in socially rented accommodation. This explains why the car and bus commuting figures differ so significantly between the two areas.

Unfortunately, the applicant is only proposing 10% of the development to be affordable housing, therefore the selection of LSOE 026E is unjustifiable. Moreover, the development is likely to have a higher car driver modal share than census area 031D with its 14.2% of socially-renting households.

Summing up, a 25% reduction in vehicle trips has been achieved by reducing the number of dwellings proposed, and a 14% reduction has been achieved by careful selection of the census area.

Pedestrian access

The Trust welcomes the proposal to provide a shared-use cycling and walking link to the east of the site (one of the routes shown in green below), connecting to the back of Station Road, as this will help to provide useful links to the centre of Ushaw Moor and to the Deerness Valley Railway Path.

The pedestrian path linking northwards (shown in green above) should have the tight corners removed and be designed for cycle use as well. This will shorten the route that cyclists would have to navigate to exit the development northwards from houses in the south-east of the development.

The Trust considers that the permeability of the site for active travel is lacking. In order to access the connection to the east of the site, people living in dwellings on the western edge have quite a detour (shown in yellow) to access it. This is made worse by the gradient of the site. The Trust considers that a pedestrian/cycle link should be provided through the site along the axis shown in purple above, which would be relatively level and would shorten the distances people would have to walk or cycle. This would also improve access to bus stops.

The east-west axis would become even more significant if any further agricultural land to the west of the site came forward for development in the future. The 13 hectare site immediately to the west was under the control of the previous applicant for this site, as shown in the site location plan for application DM/18/02982/OUT.

The pedestrian and cycle links to the adjoining residential area must be provided at the outset, and made available from first occupation of the site in order to allow sustainable travel habits to be fostered and established. This should be secured by a planning condition. The Trust is mindful of the many years of delay before sustainable travel connections were completed on the Mount Oswald estate in Durham, denying early residents the option to travel without a car. This must not be repeated here.

Cycling access

There is no audit of cycling routes in the Transport Assessment. Instead the consultants include irrelevances such as noting that the Deerness Valley Railway Path connects with National Cycle Network route 70 “linking the coast at Walney Island by Barrow-in-Furness to Sunderland”. They include an excerpt of a Durham City cycle routes map produced by the County Council. Unfortunately many of the routes on this map are sub-standard or include dangerous junctions which will prevent many people from cycling. Besides, it is clear that there are few recognised cycle routes close to the application site.

Para. 3.9 states that “all roads within the built-up areas of Ushaw Moor are reasonably safe for cycling due to low speed limits and consistent street lighting”. This reasoning is inadequate. All speed limits in the area are 30mph or higher. Figure 4.1 of LTN 1/20 sets out the minimum cycle infrastructure required depending on the speed limit and the traffic levels. We note from Table 7.1 of the Transport Assessment that Cockhouse Lane saw 950 vehicle movements in the two peak hours of the day and therefore the daily total is likely to exceed 2000 passenger car units (pcu). The same must apply to Broom Lane. With this level of traffic, and with no cycle lanes or protected space for cycling, LTN 1/20 considers the “provision suitable for few people and will exclude most potential users and/or have safety concerns”.

Beyond Ushaw Moor, the B6302 to Durham includes a section at national speed limit with no cycling provision, which is wholly unacceptable. The railway path option is unlit, and has a surface of variable quality, and cannot be considered a viable year-round utility cycling route competitive with car travel.

The site access junction proposed on Cockhouse Lane may conform with DMRB, the design standard for the trunk road network, but does not have regard to Manual for Streets or LTN 1/20 which are the appropriate design guidance for urban streets and pedestrian/cycle design. Policy 21 of the County Durham Plan requires development to have regard to the policies of the County Durham Strategic Cycling and Walking Strategy, and that document requires the use of best practice design guidance such as Manual for Streets and LTN 1/20.

The National Planning Policy Framework para. 110 states that “significant development should be focused on locations which are or can be made sustainable”. The Trust considers that the site is not currently sustainable. There is no “genuine choice of transport modes” if cycling provision is unsuitable, because the bus services have a limited range of destinations.

In order to make the site sustainable and enable cycling from this proposed development a cycle route audit should be carried out on the B6302 as far as the A167 at Neville's Cross junction and the Duke of Wellington. Identifying possible improvements would be a strong sustainable transport alternative to reduce the impact of the development.

Active Travel England assessment toolkit

Active Travel England (ATE) has provided the Planning Authority with its standing advice for residential developments, para. 1.8 of which urges local authorities to use the ATE Planning Application Assessment Toolkit in its assessment of such applications. This rates developments according to ten criteria. The Trust provides its own assessment of the ratings and the evidence for these in the following table. The comments are mainly prompted by the “common shortfalls” column in the assessment spreadsheet.

Criterion	Rating	Comments
1. Trip generation and assignment	Concern	Good that TRICS data is used to forecast all types of trip by all modes, using 2021 census data for modal split. Concerning that the walking, wheeling and cycling journey targets do not align with the national target for half of all journeys in towns and cities to be walked, wheeled or cycled by 2030. Para. 5.29 of the Transport Assessment has an employment trip target of 15% of trips to be by these modes, and no overall journey target.
2. Active travel route audit	Critical issue	The cycling routes are only identified in application documents by their location, with no assessment provided on whether these are safe, direct, convenient and accessible for people of all abilities. Access to local schools has not been demonstrated by cycling. Walking access has been demonstrated solely by distance, with no assessment of crossings. Analysis does not include photographs, and does not have regard to any of the guidance or tools listed in the ATE assessment toolkit.
3. Pedestrian access to local amenities	Concern	No walking audit has been provided. Paragraphs 3.20-3.33 of the Transport Assessment only mention the widths of footways and presence of street lighting. Surfaces and crossing points are mentioned in para. 3.11 regarding the walking route to the centre of Ushaw Moor. National Design Guide standards do not appear to have been applied in respect of the following criteria:

		• step-free • minimum width • seating at regular intervals • natural surveillance • crossing points suitable for the speed and traffic flow.
4. Cycling accessibility	Critical	As noted above, the design of the access junction will exclude many potential cyclists and does not comply with national design guidance. There is no audit of cycle routes to amenities. It is clear from the local conditions that: • The only cycle route in the vicinity, the railway path, is not lit and therefore does not comply with the five core design principles of LTN 1/20. (Note that cycle track provision on the B6302 itself would be the preferred solution to this issue, rather than altering a popular leisure route.) • There is insufficient protection from motor traffic such that many potential cyclists would be excluded.
5. Access to public transport	Condition/ obligation to make acceptable	A condition will be required to deliver the upgraded bus stops and the access to them.
6. Off-site transport infrastructure	Concern	The application identifies a footpath and cycle connection to the east of the site connecting to the back of Station Road. This needs to be secured by condition and put in place and maintained before occupation of the first dwelling. No off-site cycling improvements are proposed, despite the deficiencies that can readily be identified. Proposed road/junction improvements do not provide appropriate crossings for cycling movements.
7. Site permeability	Concern	Pedestrians do not appear to be prioritised at side road crossing points, and the corner radii may interrupt pedestrian desire lines. Access from the western edge of the development to the proposed secondary foot/cycle access towards Station

		Road is indirect: a foot/cycle path east-west through the centre of the development should be provided. The pedestrian route north to Cockhouse Lane should include cycle access and have sharp turns removed.
8. Placemaking		The Trust has not been able to assess this criterion, but notes that there do not appear to be equipped play facilities or seating to help support an active life for everyone.
9. Cycle parking and trip-end facilities	Condition/ obligation to make acceptable	The applicant has stated that cycle parking will be provided in accordance with the SPD, probably by using sheds in rear gardens.
10. Travel planning	Critical issue	The targets fall substantially short of the national target that half of all journeys in towns and cities shall be walked, wheeled or cycled by 2030. The travel plan target for these modes is 15% of employment-related journeys. The targets should be broken down annually over the travel plan period so that additional interventions can be triggered. All the ongoing travel plan actions in section 7 are essentially promotional. There are no details of effective and influential actions to be taken if targets are not met, with the intention for these to be secured and monitored (if triggered) through planning conditions and obligations.

Considering the large number of criteria rated Critical or Concern, the Trust requests refusal of the application. The criteria set out by Active Travel England are all supported in planning policy through NPPF and local plan policies such as Policy 21.

Density of housing

The area of the site is stated to be 8.55 hectares gross, on p. 4 of the Design and Access Statement. The proposal for 158 dwellings therefore represents a density of 18.5 dwellings per hectare gross. The previous proposal for this site consisted of 210 dwellings, which would have represented 24.6 dph.

Achieving an appropriate density of development is critically important for sustainable transport. To support viable public transport services the density needs to be 50 dwellings per hectare or higher (“Settlement patterns, urban form & sustainability: an evidence review”, RTPI, May 2018, section 3.5, pages 17 to 18). Lower density development also has an adverse impact on active travel because distances to walk or cycle to amenities are longer than desirable, and local services are harder to sustain.

CDP Policy 29(p) requires a minimum of 30dph “in and around town centres and locations where there is good access to facilities and frequent public transport services”.

In the summary of the Transport Assessment, section 8.4, it is stated (p. 50) that “up to seven hourly services operate in the vicinity of the site on weekdays, and up to six on Saturdays” and on p. 51 that “the site will have good access by sustainable modes of transport to relevant services and facilities, and will therefore comply with Policy 6 Development on Unallocated Sites of the County Durham Plan (2020)”.

The applicant thus claims that the proposed location of the development has good access to facilities and frequent public transport services. Therefore the criteria for the application of Policy 29(p) are satisfied, which would mean that a minimum of 30 dwellings per hectare is also required.

NPPF para. 130(c) instructs local planning authorities to “refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework”.

In weighing up the lack of compliance with Policy 29(p) the planning authority should consider the substantial adverse impact that this will have on sustainable transport. Once built there is no means of mitigating the harm of low density development, short of redeveloping the site. Therefore the Trust considers that this should be given substantial weight.

Housing types

In the initial phase the types of houses proposed are distributed as shown in the following table (derived from p. 54 of the Design and Access Statement). The identified need for housing from the 2019 Strategic Housing Market Assessment (SHMA) is shown in the final column.

Number of bedrooms	Number of dwellings	Proposed percentage	SHMA percentage
1	0	0%	10%
2	10	6%	38%
3	30	19%	52%
4	95	60%	-1%
5	23	15%	0%
Total	158		

The bulk of the housing is proposed to be 4-bed dwellings, a category which the SHMA identified as being over-supplied with demand reducing in the 2016-2035 period. The applicant proposes a much smaller proportion of 2 and 3-bed properties than the market requires, and no 1-bed properties.

The Trust considers that the planning application should be rejected as a failure against Policy 19, because the mix of dwelling types and sizes is not appropriate. The applicant has not justified the proposal through additional supporting information such as market demand or viability assessments (see CDP para. 5.189). Note that if the mix of dwellings more closely matched the SHMA, it would also be easier to achieve the density levels required by Policy 29(c): the failure against one policy is reinforcing the failure against the other.

The applicant's responses to section 4 of the County Durham Building for Life SPD on p. 78 of the Design and Access Statement have not addressed the suitability of the housing types proposed.

The Trust agrees with the DCC Housing Officer's concerns about the distribution of affordable housing.

Car parking and street design

Many of the streets will be dominated by car parking in front of the houses. This particularly affects the two and three-bed properties as shown in the excerpt below from the Parking Plan, where the blue spaces are parking in the open, within the property boundary, the orange blobs represent garages, and the purple spaces are visitor parking:

The County Durham Building for Life SPD para. 11.5 encourages using a range of parking solutions:

> Where parking is positioned to the front of the property, ensure that at least an equal amount of the frontage is allocated to an enclosed, landscaped front garden as it is for parking to reduce vehicle domination. Where rows of narrow terraces are proposed, consider positioning parking within the street scene, for example a central reservation of herringbone parking.

The County Durham Design Code SPD contains the following principles for car parking in the "19th century mining village" typology which Ushaw Moor falls into:

- avoid visual dominance of car parking in streetscene, consider use of landscaping and boundary treatments to soften visual impact
- removal of boundary treatments and front gardens to accommodate front in-curtilage car parking should be avoided
- innovative approaches to parking provision are encouraged.

Part of the difficulty for the designer is the excessive parking requirements of the current Parking and Accessibility SPD which conflict with NPPF, Policy 21 and the aforementioned SPDs. Bellway has received planning permission for a development at Sniperley which provides fewer car parking spaces than required by the SPD, and if this Ushaw Moor site is as accessible as claimed, it would be appropriate to reduce the car parking provision here also. If the numbers cannot be relaxed, the main mitigations available would be greater use of trees and landscaping, and innovative parking solutions, which could include reducing the in-curtilage provision and providing more communal spaces coupled with car club provision.

Conclusion

For the reasons given above, the Trust considers that the policy failings are too fundamental to be addressed simply through applying conditions, and therefore asks that the application be refused.

Yours sincerely,

John Lowe
Chair, City of Durham Trust