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

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

5 May 2025

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

Dear Mr Harvey,

DM/25/00762/FPA - Land at Red Barns, Brandon, Durham DH7 8DA

Hybrid application comprising full planning permission for the construction of 140 dwellings, primary site access and associated SuDS and landscaping; and outline planning permission with all matters reserved for the construction of up to 260 dwellings, secondary access, local centre incorporating retail (up to 4,000 sqft) (Use Class E) and mini-mobility hub, and associated SuDS and landscaping.

The Trust supports the objections by the City of Durham Parish Council and the Neville's Cross Community Association. It also highlights key points from the Durham County Council (DCC), Design and Conservation, Landscape and Affordable Housing comments.

Summary

The Trust builds on these objections and comments and objects to this application on the following grounds:

- failure to identify the current health and education provision and how it will be impacted upon by the proposed development (as identified in the City of Durham Parish Council objection)
- 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))
- zoning of house types and affordable housing potentially leading to social division (NPPF para. 96(a), County Durham Building for Life SPD section 4c)
- inappropriate mix of housing types (CDP Policy 19, County Durham Building for Life SPD section 4)
- very low density of development, making ineffective use of land (NPPF para. 130), discouraging sustainable transport (NPPF section 9), and being at odds with the relevant settlement typology (County Durham Design Code SPD)
- major 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". The form 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)
- uncertainty over delivery of additional walking and cycling links to surrounding neighbourhoods (CDP Policy 21(a,b), NPPF paras. 109, 117(a))
- some pedestrian access issues identified in the audit left unaddressed
- inadequate audit of cycle access in the Transport Assessment
- 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
- 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.

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

Design Code

The design analysis submitted as a part of the Design and Access Statement offers little to generate a distinctive development and the Trust shares the view that this does not amount to a Design Code with the County Council (Design and Conservation comment, Design and Materials, first bullet point). It fails firstly by not identifying types of development that could lead to generating a site responsive, unique solution to design. Site context and townscape analysis are too simplified. The local vernacular is not sufficiently detailed and fails to lead to adequate conclusions influencing design. House types are based on a 'pattern book' of existing designs offering nothing but similarity to many other larger housing developments. Material variations are random and not related to a distinctive or coherent design approach.

There needs to be a greater correspondence between actual housing market need and those proposed. The preponderance of detached houses is forced and creates a dull and repetitive layout. Correcting this also needs to ensure effective absorption of the affordable housing units avoiding social division. Building on a greenfield site such as this needs more effective layout and landscaping than demonstrated in the current proposals.

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 existing open space (DCC, Landscape comment)

- ensuring adequate and legible footpath (and cycling) linkages are incorporated into the layout and landscaping in support of accessibility
- demonstrating site contextual relationship of structural tree planting (DCC, Landscape comment)
- remedying the poorly integrated SUDS provision and the bunding surrounding Red Barns to smoothly integrate them into the topography of the open space areas
- resolving the poor landscape treatment on the eastern Boundary (DCC Design and Conservation)
- integration of car parking and house drives into a design solution avoiding streetscape domination of parking (DCC Design and Conservation).

Sustainability

The Trust objects to the proposal to heat the houses with gas boilers rather than installing heat pumps (see Sustainability Assessment para. 4.1.1). 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 according to the Sustainability Assessment 4.1.1 this is only to improve the dwelling performance to the level required for Building Regulations Part L 2021. The number of panels may fall short of the Policy 29(c) requirement to "minimise greenhouse gas emissions, by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation".

The applicant asserts (Planning Statement paras. 4.3 and 7.114) that "the design proposals address cost-effective methods of improving energy efficient, by reducing energy demand and offsetting the long-term carbon emissions of the development through optimization of dwelling orientation, aided by good passive solar and thermal design". The dwellings in the first phase appear to be oriented in roughly equal numbers towards the NE, NW, SE and SW so it is hard to see how this claim can be justified. 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 design appears to mainly shaped by a street layout that is primarily governed by motor vehicle access. This is considered a failure against Policy 29(b) and (c).

Transport Assessment

The Trust welcomes the fact that Systra, 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). Sections 1.5 to 1.7 of the Transport Assessment set out the vision. Para. 1.6.1 states (emphasis added):

The Vision for Active travel at the development will be to create a community where walking and cycling are the preferred modes of transport for most short trips, achieved through a well-designed network of safe, accessible pedestrian and cycling paths that seamlessly connect homes to the essential amenities in the area such as shops, schools, public transport, and green spaces, ultimately promoting a healthier lifestyle and reducing car dependency within the development.

Despite this vision statement, the rest of the documentation follows the typical pattern of transport assessments prior to the revision of NPPF. The vision is not, in any sense, informing the design of the development, and the assessment of existing facilities is no better than usual.

Great attention has been paid to the car trip generation, with modelling of the impact on road junction capacity along the A690 as far as the Neville's Cross junction, but as far as active travel is concerned, there is an assessment of the quality of walking routes beyond the site boundary, but no assessment of cycling route quality.

The Trust does not consider that the application lives up to the level of ambition set in the vision statement.

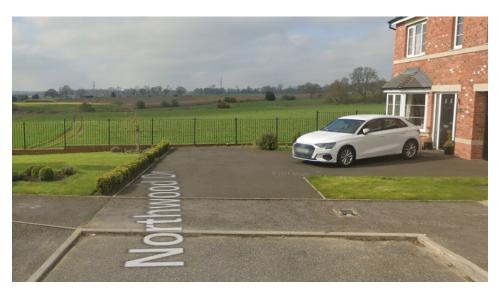
Enhancements to the active travel network

Transport Assessment para. 2.6.2 states that the proposed residential development "supports the sustainable travel objectives of the NPPF and County Durham Plan by enhancing local access to sustainable transport options". On careful reading of the document, especially Appendix H, the enhancements consist of:

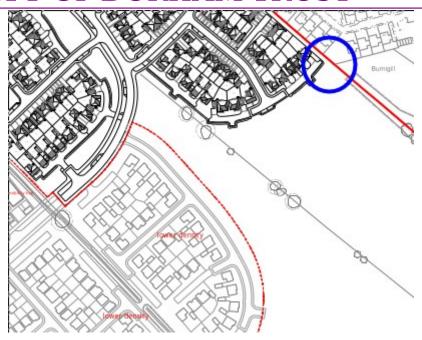
- 1. providing a signalised crossing of the A690 and footway connecting to Sawmill Lane to access the site
- relocating and upgrading bus stops adjacent to the site, and widening the access footway
- 3. improving the railway path crossings of Sawmill Lane and Carr Avenue.

Items 1 and 2 are surely the bare minimum that one might expect to provide safe access to the site. The railway path crossing improvements are stated to consist of tactile paving, dropped kerbs and coloured surfacing. There are, in fact, already dropped kerbs and coloured surfacing (a bit worn) in both locations, so this improvement is minor.

In addition, appendix H offers a "potential pedestrian connection to tie in with existing network", by linking the site to Brandon and Byshottles footpath 102. Figure 15 on p. 38 says this "shall be explored". There is no clarity on how this will actually be achieved. The walking audit (Transport Assessment appendix B, p. 78) floats this route as a possible connection to Northwood Drive for access to Browney primary school, but although the applicant appears to control the land containing the footpath, there is no link at present at the end of Northwood Drive. The DCC Adopted Highways map confirms that there is private land separating the end of the drive and footpath 102, which runs beyond the boundary fence shown in the photograph:



As for a connection from the proposed development, the recognised footpath does not pass alongside the site boundary anywhere near the proposed initial phase of around 140 homes. There are informal paths through the adjacent land, but the shortest connection to these would need to link from the eastern corner of the proposed development, via a shared driveway which would presumably not be adopted (circled in blue in the following excerpt):



Access to this connection from the vast majority of the site proposed in outline would be indirect and not at all obvious or "legible". The County Durham Building for Life SPD section 1 asks how a scheme integrates into its surroundings "by reinforcing existing connections and creating new ones". The SPD supports developments where the street layout is shaped to "create linkages across the scheme and into the existing neighbourhood and surrounding places". The applicant addresses these points in section 12.1 of the Design and Access Statement, but only with reference to the proposed A690 access. The Trust considers this is inadequate and that the design development has been driven by the car access.

The Trust also questions why the applicant only proposes a pedestrian link, rather than one which also supports cycling, considering that the connection could also give better access to a significant employment site.

Without this "potential pedestrian connection" the site will only be accessible via the new junctions onto the A690, despite abutting the existing residential area south of Browney Lane. The Trust is of the view that it is essential to link the site to the playing field and green space lying between Burnigill and Littlewood Close, and to connect to the Northwood Drive estate to provide a wider range of journey opportunities for people walking and cycling and thus to favour sustainable transport access. Moreover, the whole of the site applied for in outline should be redesigned and reconfigured to prioritise access by walking and cycling including making legible and direct connections to the surrounding network.

The 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. 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.

Walking routes audit

There is a reasonably thorough audit of walking routes provided in Transport Assessment appendix B (PDF pages 77-80).

Considering that it identifies the lack of a pedestrian crossing on Sawmills Lane as a discouragement to the use of the railway path, it is strange that the "improvement" proposed does not differ from the current provision! The Trust would like to see the priority at these junctions given to users of the railway path, for example by use of zebra crossings with raised tables and a continuous surface for pedestrians and cyclists. The awkward, indirect chicane or

gated access to the railway path should be replaced to be compliant with national design standards for inclusive mobility and cycling.

Aside from issues already mentioned, the audit identifies:

- Verge parking along A690 from West View till Central Avenue reducing visibility of pedestrians and hinders crossing of A690
- No crossing point on Browney Lane at Harle Street
- No footway present on southern section of St John's Road at junction with Browney Lane

The improvements column suggests the provision of a footpath access to Northwood Drive, as discussed above, reducing journey times in the direction of Browney primary school and the St John's Road industrial estate. But these issues have not been addressed by any firm commitment on the part of the applicant. The Trust asks that conditions be applied to deal with these issues.

Cycling routes audit

There is no cycling routes audit in the Transport Assessment. Instead the consultants include irrelevances such as noting that National Cycle Route 70 gives connections from Barrow-in-Furness to Sunderland. There is an assumption that all cycle routes in the vicinity are already suitable for the majority of people, which is emphatically not the case. Aside from there being absolutely no cycling provision on the A690, the primary route in the area, the railway path itself is compromised by the extreme gradients on the approach to Broom Park, and the lack of any safe connection to Durham City.

The signalised junction proposed at the northern end of the site features advanced stop lines (ASLs) for cyclists (Transport Assessment paras. 4.3.8 to 4.3.10), which are not a recommended form of cycle provision in LTN 1/20, especially on a road suffering high traffic volumes like the A690. LTN 1/20 para. 10.6.4 states that ASLs are "unlikely to be adequate by themselves to encourage most people to cycle through major junctions" and para. 10.6.5 lists them as the least effective in a list of nine types of cycle facility for use at traffic lights.

It is unclear whether the 3m footway on the northern side of the A690 is intended for shared pedestrian/cycle use. The Transport Assessment para. 4.3.11 only refers to pedestrian use. Figure 13 on the following page labels it a shared footway/cycleway, but only refers to the crossings as for pedestrian use. Similarly the main non-vehicular path on the "boulevard" is described solely as a pedestrian route in the Design and Access Statement section 6.1. This section, entitled "Movement", makes no mention of cycling.

If the footways are also intended for cycling the Trust would object that:

- shared use is strongly discouraged in urban environments by LTN 1/20;
- the staggered crossings and refuges are almost certainly non-compliant with the LTN 1/20 requirement to accommodate non-standard cycles such as those with trailers;
- there is no transition from the new A690 footway onto the existing cycling provision (i.e.
 the carriageway) at Sawmill Lane: in particular, turning right from Sawmill Lane onto the
 new footway, and exiting the footway to proceed along the A690 need to be facilitated.

If the main access boulevard is intended for use by cyclists, the Trust notes that the proposed width of 6.7m given in section 6.1 of the Design and Access Statement, means that the lane widths fall into the 3.2m to 3.9m range which endangers cyclists (see LTN 1/20 para. 7.2.5).

In order to enable cycling from this proposed development an audit should be carried out on the A690 as far as the Neville's Cross junction, including Lowes Barn Bank. The consultants have modelled this route for the motor traffic likely to be generated by the development. Assessing the cycle infrastructure and identifying possible improvements would be a strong sustainable transport alternative to reduce the impact of the development.

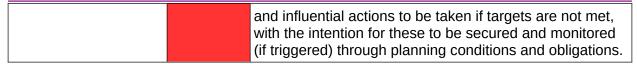
The applicant has provided a redesign of the Stonebridge roundabout as a signalised junction to increase capacity. It does not make provision for cycling, which is needed on all arms of the junction along with a connection to Lowes Barn Bank. There is an opportunity to include a bus priority system by extending the bus lane to the junction. This has been missed. The design should not be accepted in its current form.

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	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.	
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, although walking has been assessed. Qualitative analysis (e.g. the walking audit) does not include photographs. Assessment of cycle routes does	
3. Pedestrian access to local amenities	Concern	not have regard to LTN 1/20 appendix A or B. While a walking audit has been provided, the methodology has not been stated. The National Design Guide standards may not have been assessed in respect of the following criteria which are not mentioned in the audit: • minimum width • seating at regular intervals • natural surveillance	
4. Cycling accessibility	Critical	 natural surveillance 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 A690 itself may be the preferred solution to this issue, rather than altering a popular leisure route.) The development relies in a great part on shared use routes, conflicting with LTN 1/20 para. 1.6.1(2). 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 access thereto. How much of the full site is within 400m of a bus stop will depend on the final layout and arrangements with bus operators. Perhaps the rating should be "Concern", especially as there is no evidence presented of liaison with bus operators that could inform the design. The density of the development is unlikely to make a bus service diversion viable.
6. Off-site transport infrastructure	Concern	While the application identifies a possible footpath connection, there is no commitment to its delivery. No off-site cycling improvements are proposed, despite the deficiencies that can readily be identified. The mechanisms to secure improvements are not identified, particularly in respect of the full application. Proposed road/junction improvements do not provide appropriate crossings for cycling movements.
7. Site permeability	Critical	The development does not safeguard pedestrian and cycle connections to neighbouring sites. Pedestrians and cyclists do not appear to be prioritised at side road crossing points. There are no pedestrian or cycle access routes except those along roads, giving no active travel advantage. It is not clear whether corner radii will interrupt pedestrian desire lines: this needs verifying. It is unclear whether the site includes any dedicated cycle tracks: cycling provision appears to be either entirely oncarriageway, or partially shared-use. If the latter, then some transitions are missing for access to side roads. If on-carriageway then the lane width of the main boulevard does not comply with LTN 1/20 para. 7.2.5 and will endanger cyclists.
8. Placemaking		The Trust has not located sufficient information to assess this criterion, though it may have been provided by the applicant. The main boulevard through the development is likely to encourage speeds in excess of 20mph because of the housing being set back from the carriageway on one side.
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, but the Trust has not seen any evidence of this in the house type plans or site layout plan. The Travel Plan para. 6.5.5 does state a single space will be provided for each dwelling, whereas the SPD requires either a garage or space for 4 cycles. This requires further verification or a condition.
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 target for these modes is only 17%. It is not clear how the targets relate to the proposed phases of development. All the ongoing travel plan actions in section 7 are essentially promotional. There are no details of effective



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 Planning Statement refers to the SHLAA in section 2.11, where the area of land 4/BR/07, about 3.5ha larger than the area subject to the application (37.98ha), was assessed as having a developable area of 36.51ha with an estimated yield of 1095 dwellings (which would be at a rate of 30dph). That means the developable land was about 88% of the total.

The current application site is 37.98ha. Assuming that the same proportion, about 88%, is developable that would amount to about 33.4ha. Initially the applicant proposed, via a preapplication enquiry, a yield of 600 dwellings. This has been reduced to 400 for the current application. Taken across the developable land, that would represent a yield of just 12 dwellings per hectare gross.

It has not been explained why the applicant has chosen to propose so few dwellings compared to the estimated yield in the SHLAA. Possible reasons include avoiding causing severe impact on the highway network and being required to fund costly mitigations.

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.

The undeveloped land in the proposal, including habitat restoration, wetland, public space and community orchard, is very welcome. Being furthest from the A690 access points, the undeveloped land does not have an impact on sustainable transport. It is therefore more appropriate to look at the density of the land proposed for housing. We estimate that the first phase of development includes about 11ha, and with 140 houses this would be only 12.7 dwellings per hectare. Some higher density housing is proposed, in outline, for the subsequent phases, but nevertheless the density is still extremely low.

Unfortunately the CDP Policy 29(p) only has a requirement for a minimum of 30dph "in and around town centres and locations where there is good access to facilities and frequent public transport services". The County Durham Design Code SPD does not stipulate numerical density targets, but the illustrations of new development appropriate to the 19th century mining village settlement topology all show substantially denser development than proposed.

NPPF paragraphs 129 and 130 are relevant here. Para. 130 states that "where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site". The threshold for "low density" is not defined, but noting that PPG3 required a minimum of 30 dph universally, anything under 30 dph must surely be considered low. The Sustainability Assessment para. 4.1.1 describes the development as "low density".

The applicant is justifying building on unallocated land precisely because of the expected shortfall in housing land supply following the adoption of the new Standard Methodology, and therefore this injunction against low density development applies. 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".

While the local plan policies do not rule out development at such low densities as those proposed, the planning authority should clearly consider the substantial adverse impact that this will have on sustainable transport. As there is no means of mitigating the harm of low density development, once built, short of redeveloping the site, 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. 15 of the Planning 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	14	10%	38%
3	37	26%	52%
4	82	59%	-1%
5	7	5%	0%
Total	140		

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. It may be that the mix is intended to be different as the outline part of the scheme progresses, but there is inadequate information to form a judgement on this.

The Trust considers that the full 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). The applicant's responses to section 4 of the County Durham Building for Life SPD in section 12.4 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, and the lack of detail regarding ownership versus rental.

Car parking and street design

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



DCC Design and Conservation has identified and objects to this issue, suggesting reducing the density to accommodate more car parking at the sides of houses. The Trust notes that a reduction in housing density also reduces public transport viability and would therefore prefer other options, as supported by DCC policies.

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 Brandon, Meadowfield and Browney village fall 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 the Red Barns 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.

Social cohesion and active travel routes

Near to the A690 access, on the south side of the main access road, the applicant proposes a group of 3-bed detached properties, set in green space. It is possible that these are intended to command a premium sale value. The properties are divided into three groups, with car access from the north-west of the block, the middle, and the south-east. It is unclear whether foot access will be continuous across all three blocks, as the common access driveways are shown

as divided. Presenting their car parking at the front of the property, the property design clearly prioritises car access over sustainable modes.



The layout also limits social interaction because the main pedestrian and cycle access along the street is far from the front doors. This runs counter to NPPF para. 96(a) which speaks of achieving inclusive spaces which

promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages

Depending on the intended market, the layout may discourage interaction between the wealthiest members of the community and the less well-off, causing social division. This conflicts with the Building for Life SPD item 4c which asks "are the different types and tenures spatially integrated to create a cohesive community?". The applicant's response to this question only relates to affordable housing, the distribution of which is criticised by the DCC Housing Officer.

We have already noted above the fact that the proposed main access road is likely to encourage speeds of more than 20mph because the housing is set back substantially on one side. There are also no pedestrian or cycling routes through the development other than alongside the roads. The green space could be repositioned, to include a new green walking and cycling route intersecting (and taking priority over) all the side roads to the east, and extending to make a connection to footpath 102. Housing could be reoriented to front onto this new path to provide natural surveillance. The consequent narrowing of the main road alignment would help to keep traffic to lower speeds, and bringing the main access road close to the housing to the south-west of the road would promote social interaction, dealing with this issue noted above.

The applicant could also add a continuous foot/cycleway to the west of the first phase of housing, leading to the local centre, created by providing a path alongside the shared driveways on that side. Such a network would be a far more convincing response to the vision set out in

the Transport Assessment. The alignment of these two possible active travel routes is shown in green and purple on the following site layout excerpt.



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