

THE CITY OF DURHAM TRUST

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

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13 February 2026

Mr Steve France
Durham County Council Planning Department
PO Box 274
Stanley
County Durham
DH8 1HG

Dear Mr France,

DM/25/03404/OUT – Integra 61 Phase 2 to the west of Amazon UK Integra 61, West Bowburn, DH6 5FG

Outline planning application for the erection of commercial buildings (B2 (General Industrial), B8 (Storage and Distribution)) with ancillary office floorspace, part new road linking the A688 to the A177 with associated infrastructure, access, landscaping and other related works (all matters reserved)

The summary of the Design and Access Statement (section 11, p. 43) states:

Integra 61 Phase 2, in combination with the Phase 1, will be an exemplar employment led development of strategic importance, not only locally, but regionally and also nationally. It is therefore critical that the proposals are of the highest quality, with the site master planned so that it maximises the benefits for the occupiers, users and neighbours alike. Key to this objective will be the considered siting of buildings within a well-designed and appropriately landscaped estate road infrastructure, which will combine access by all available modes of transport, giving high priority to pedestrians.

Accepting that the land is allocated for employment purposes in the County Plan, the Trust is very keen to see these ambitions realised: an exemplar development of the highest quality, well-designed, appropriately landscaped, and with high priority given to pedestrians.

However, the Trust finds that the submission fails significantly in two areas – landscape (including lighting and cladding colour choice) and transport. Failure in these areas and the relatively basic design approach illustrated are not that of an exemplar development. These are fundamental flaws and need further work at the outline stage before adequate planning conditions can be used to ensure the necessary excellence in detailed layout, design, and sustainable transport. As these are significant failings the Trust suggests that the application is not approved until these failures are addressed.

Landscape

There are a number of key areas in relation to the impact of this proposed development, including impacts of the associated Bowburn Relief Road. These are:

1. The high impact of Integra Phase 1 and the Amazon warehouse in particular that will cause cumulative impact when combined with the proposed Phase 2.

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2. The proximity of residential development and overwhelming extent of industrial development relative to the built area of Bowburn
3. The local visibility, more distant views from rising ground and visibility from the A1 of the combined development.

The extent of the units, car parking and servicing precludes more extensive landscaping with the exception of the watercourse area (Tursdale/Bowburn Becks) that would remain open. The omission in the landscape analysis of the existing impact of the adjacent development and its cumulative impact understates the apparent impact compared with that which will actually occur. The result is that the landscape mitigation shown is inadequate for this scale of development. The length of time required of growth of tree belts is also a factor where their effectiveness is limited for two decades or more. The landscape plan has not evolved from the landscape analysis, but is based on site development needs only.

The Bowburn Relief Road corridor is particularly constrained where it abuts the new housing. Screen planting will not be possible and more visually intrusive sound barriers may be required due to the potential for extensive lorry use.

Lighting of the units cumulatively is a factor in impact. The Lighting Baseline Survey clearly shows the high combined impact of external and internal lighting of the large Amazon unit. The extension will extend the impact of this, and a more sensitive approach is needed to reduce and mitigate against its impact.

The colour of the units illustrated is similar to that of the other existing units. Neither this, nor the colour of the Amazon unit is successful either in the wider landscape context or in more local views. The dark grey is very visible in contrast to the landscape and more prominent in local views. The lighter colour of the Amazon unit renders it very prominent.

Notwithstanding this application's outline status, the expectation is that the scheme illustrated and assumptions embodied in it will form the basis for subsequent detailed submissions. For this reason, the Trust objects until more extensive and sensitive strategies are outlined that can be implemented through further work at detailed design stages. These should cover cumulative impact of both Integra 61 Phase 2 and the Bowburn relief road and include:

1. Areas needing landscape mitigation and inclusion, where feasible, of offsite works with the intention of minimising impact and realistic assumptions of the extent of landscape intervention. Detailed attention will be needed for the Relief Road adjacent to the residential housing.
2. Mitigation of lighting concentrating on minimising impact on the landscape and local areas without compromising safety needs and including hours of lighting.
3. Assessment of the local landscape and impact of current schemes to evolve a colour palette that will minimise landscape impact.

Sustainable transport

The Transport Assessment claims to be “vision-led” to match the requirement of NPPF para. 118. Section 2.2 of the Transport Assessment and the Travel Plan (Appendices to Chapter E, p. 15 and p. 585) sets out “Our Vision”:

Our vision is to deliver a transport strategy that reduces the reliance on private car travel where possible and to encourage sustainable travel options where feasible.

By prioritising sustainable and active travel modes, integrating robust Travel Plan initiatives, and addressing key barriers to modal shift, the strategy will align the development with local and national policy objectives, including Net Zero carbon reduction and improved air quality.

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Recalling that the Planning Statement boasts of an exemplar development of the highest quality, with a well-designed road infrastructure and high priority given to pedestrians, the Trust considers that the proposals fail to comply with this vision and with Policy 21 in the following ways:

- ⑩ There is insufficient regard to the opportunities of making the site more sustainable through the reopening of the Leamside Line, particularly with regard to freight use.
- ⑩ Indicative designs of pedestrian and cycle infrastructure within the site do not comply with national design guidance or with the NPPF.
- ⑩ Better pedestrian and cycle access through the existing Integra61 site should be secured via a condition.
- ⑩ Safe and continuous cycle routes to Durham City and Spennymoor should be provided, as currently the area accessible safely by cycling is extremely limited.
- ⑩ The proposed Travel Plan should build on adopted travel plans and surveys for the existing development, rather than being a superficial update of the Travel Plan submitted for the Phase 1 outline application.
- ⑩ The sustainability of the site in transport terms is considerably overstated.
- ⑩ There is insufficient information to judge the impact on the Durham City Air Quality Management Area, but the impact on A177 traffic north of Bowburn will be significant, and the effect on Durham City may be unacceptable.
- ⑩ Even with the proposed Bowburn Relief Road, traffic levels within the village are projected to increase substantially over the 2025 baseline.

These points are evidenced below.

Leamside Line

The Trust welcomes the proposed provision of a second pedestrian and cycle crossing of the Leamside Line in addition to the main vehicular access. The choice of underpasses will help safeguard the Leamside Line route for reopening and electrification.

The documentation mentions the possibility of a “halt” on the Leamside Line to serve the area (Transport scoping note, para. 1.3.3, Appendices to Chapter E PDF p. 93). The Trust would like to see assurances that there will be sufficient land remaining alongside the Leamside Line to provide the optimum location for a future Bowburn railway station, and that suitable pedestrian and vehicular access will be achievable.

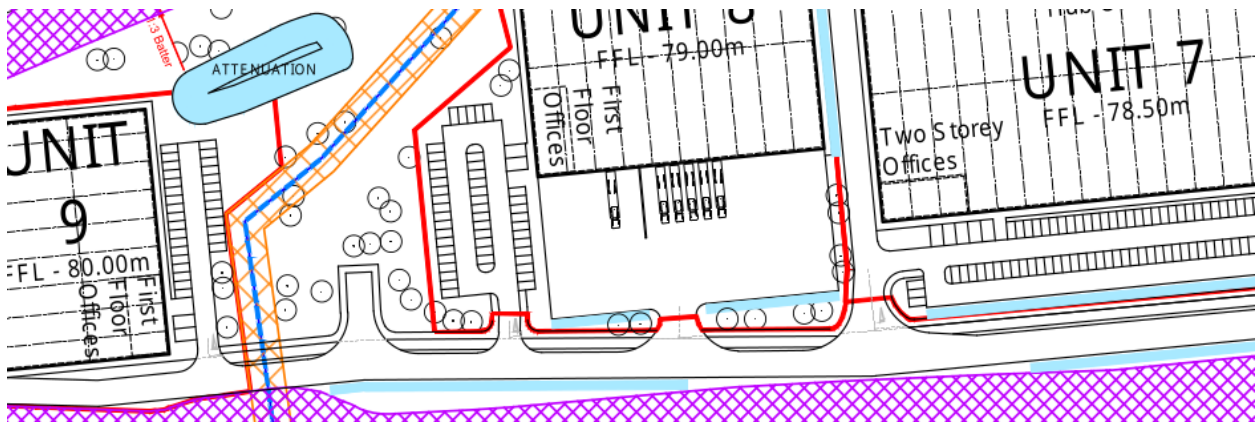
The reopening of the Leamside Line has the potential to improve the sustainability of the location. It is highly regrettable that there appears to be no plan for rail freight connections or transshipment facilities at the site, which could reduce the number of HGV movements.

Design of pedestrian and cycle infrastructure within the site

The Trust notes that the site layout will be subjected to further reserved matters applications, but objects to features of the indicative drawings, which often are used to justify subsequent applications. In general, as with the existing Integra 61 site, walking and cycle routes have been dictated by the road network and the form of its junctions, rather than truly being given priority.

The pedestrian and cycle access in the new site is frequently interrupted by the vehicle turnings for cars and lorries, all with wide-radius turnings which are less safe for vulnerable road users. Units 5-9 are reached first by crossing the main access road at the roundabout, and then walking alongside it, between the road and the development units. People walking to Unit 9 would cross a total of eight of these side turnings.

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If the pedestrian and cycle way were on the other side of the main access road, users would only have to cross that road once, opposite the pedestrian entrance to the unit they are going to. The planning authority needs to ensure that pedestrians and cyclists are truly prioritised within the new development. The indicative drawings show that the motor traffic is prioritised.

Within the existing Integra 61 site, 3m wide shared-use pedestrian/cycle routes are provided along one or both sides of the access roads. Their design is not compliant with the recommended design speed for cycle infrastructure set in LTN 1/20 because the paths turn sharply away from the main access road at every side road. The routes should deviate as little as possible from the desire line. The paths also have no priority over turning traffic. Indeed, in many cases, pedestrians and cyclists have their route lengthened in order to give way to roads which are not yet in operation.



All new pedestrian and cycle infrastructure in the development should be built fully compliant with LTN 1/20, and with surface treatments or raised tables at side turnings to reinforce the hierarchy of users introduced in the Highway Code (Rule 170) in 2022. This would also help satisfy NPPF para. 117(a) to “give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas” and 117(c) to “create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles”.

The Trust suggests securing compliance via a condition.

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Pedestrian and cycle access through the existing Integra 61 site

All access to Phase 2 will be through the existing Integra 61 site. While 3m wide shared-use pedestrian/cycle paths are provided, there is no assistance or priority at side roads or roundabout junctions.

As well as the main vehicular access, the developer proposes a secondary crossing of the Leamside Line by the Bowburn Beck, roughly at the point labelled 1 in the following satellite image. Access to Bowburn village via a cut-through can be obtained by continuing north along Bowburn Way at the point labelled 2.

The site access map on page 9 of the submitted Active Travel Plan shows an “existing pedestrian access” path heading directly south-west from the village, but the route shown on that map would actually cut through the building visible on the satellite view and labelled 3. There is, instead, a less direct path which we have highlighted in red on the satellite view. The Trust considers that a direct route, on the alignment of the yellow dashed line in the satellite view, is necessary to provide good-quality pedestrian and cycle access to the Phase 2 site.



The application does not mention upgrading any of the existing paths within the Integra 61 site, describing them all as being in good condition. But the path highlighted in red is narrow and appears to be surfaced with loose stones. It is therefore not currently suitable as a cycle route, and should be widened and given a tarmac surface and lighting to provide a primary access route to the crossing from Bowburn village. The following Google StreetView picture shows the end of the path at the point marked 4. The crash barrier will need removing, and consideration should be given to providing a pedestrian/cycle zebra crossing to prioritise active travel movements.



The Trust suggests applying a condition along these lines:

Prior to commencement of construction of vehicular access to the site, details of a direct pedestrian and cycle path to be provided or upgraded from the northern (secondary) access underpass of the Leamside Line north-east to Bowburn Way, to facilitate active travel between the site and the A177 Durham Road in Bowburn Village adjacent to Edna Street, shall be submitted to and agreed in writing by the Local Planning Authority, such path to be designed in accordance with LTN 1/20 with priority over vehicular movements where appropriate. The agreed design shall thereafter be implemented in full prior to the first occupation of any part of the site subsequently approved.

Reason: in order to give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and facilitating access to high quality public transport, in accordance with Policy 21 of the County Durham Plan and paragraph 117 of the National Planning Policy Framework (Dec 2024).

Cycling access to the site

The Transport Assessment para. 4.3.1 and the Travel Plan paragraph 4.2.11 (Appendices to Chapter E, p. 596) states that “cycling provision is a fundamental aspect of encouraging modal shift and supporting sustainable travel options at Integra 61”.

Paragraph 4.2.14 of the Travel Plan (Appendices to Chapter E, p. 596), and 4.3.4 of the Transport Assessment, lists villages, and towns such as Spennymoor and Durham City which it states are within 30 minutes' cycling from the site.

A map on page 10 of the Active Travel Plan indicates routes that cyclists might wish to use. Aside from the shared use paths within the existing Integra 61 development, none of the other routes shown on this map as connecting with the site have adequate cycle infrastructure: the map key labels them as “cycle journeys” rather than as part of any recognised network. The map also shows two National Cycle Network routes which are beyond 5km from the site, a local leisure route via the Croxdale estate which is not useful for commuting, and the Great North Cycle Way along the A167, which is not complete.

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Considering the “cycle journeys” indicated on the map, the A688 from the existing Integra 61 site has merely a narrow path for pedestrians and no cycling provision as it leads past the southern Amazon UK roundabout towards Tursdale. The continuation west through Metal Bridge to Thinford is no better. These roads are subject to the national speed limit. The national Cycle Infrastructure Design document LTN 1/20 would class this (via Figure 4.1) as “provision suitable for few people and will exclude most potential users”.

The A177 northwards towards High Shincliffe is also a national speed limit road with a narrow tarmac footway on one side, immediately adjacent to the carriageway, which in places has been designated a shared use route. A safe cycle route alongside a 60mph road would require a minimum 3m width (LTN 1/20 Table 5-2) with an absolute minimum of 2.0m separation from the carriageway (LTN 1/20 Table 6-1) or a crash barrier (para. 5.11.3).

Page 12 of the Active Travel Plan refers to a “cycle audit” in Appendix A. The range of routes and destinations audited is very limited, only covering connections into Bowburn. No off-site improvements are proposed.

While the documentation submitted with the application tries to suggest that cycling is a viable travel option from up to 5km away, in reality, because of the lack of continuous cycle network, none of the places listed except Bowburn and Coxhoe are actually safely accessible by cycling. If safe cycling routes existed, they would surely have been included in the audit in Appendix A.

The 2011 census showed that 1% of people cycled to work in the local area. The DfT Propensity to Cycle Tool (<https://pct.bike/>) estimates that with Dutch-quality infrastructure (as mandated by LTN 1/20) and good take-up of e-bikes, that figure would rise to between 15% and 25% for the areas mentioned as being within 30 minutes' cycle distance in the Travel Plan.

The vision-led approach as quoted above promises to address “key barriers to modal shift”. It is clear that the lack of safe cycle routes is the main barrier to modal shift towards cycling. Yet the applicant does not commit to enhance any off-site cycling provision. The planning authority should seek Section 106 contributions to connect the site to Spennymoor and to Durham City, these being the areas with significant population and the most potential for modal shift.

Travel Plan

Condition 20 of the outline application, DM/15/03912/OUT, for the first stage of the Integra 61 site, required the submission to the planning authority, and approval, of a final travel plan prior to occupation of each phase, but a preliminary travel plan was submitted with the application.

The Travel Plan for the present application is found at p. 574 of the PDF entitled “Appendices to Chapter E”.

The applicant has used the same transport consultancy firm to produce the Travel Plan as for the original 2015 application (JMP was absorbed by Systra), and many sections of the submitted plan are actually identical or have had only minor updates.

For example, the original Travel Plan promised that the Integra 61 website would be developed to include information about sustainable transport, and would “provide a central reference point which can be used across the development to access information relating to travel plans, notices for any travel activities or events and will be points of contact for any queries regarding travel to or from the proposed development”. There is no such information available currently on the Integra 61 website. The Location page, <https://integra61.co.uk/location/>, shows a diagram of the local major road network and a map of HGV driving times across the north of England. There is also a page on “Roadside Demographics” (<https://integra61.co.uk/roadside-demographics/>) which states that over 50,000 vehicle trips will be using the J61 roundabout, just 200m from the site. A brochure dated two years ago attached to the page advertises “prime roadside opportunities” for fast food and retail, and features the connections to the A688 and A1(M) but does not mention public transport, walking or cycling access at all.

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Perhaps the final approved travel plans for each phase did not include a commitment to deliver this information via the website? But why, then, does the Travel Plan submitted with the current application promise that the Integra 61 website will provide the same information, using exactly the same wording as the 2015 plan?

The Trust scrutinises almost every planning application submitted by Durham University, another major local employer. The University tends to submit an actual working Travel Plan which has been revised to reflect new measures which have been adopted over time. Considering that the Integra 61 site has been operational for several years, why has the applicant submitted a provisional travel plan whose measures differ hardly, if at all, from that submitted ten years ago?

The Travel Plan submitted with the original application, DM/15/03912/OUT, stated that a Car Park Management Strategy was “an essential part of any travel plan” as demand management can help encourage modal shift. The Travel Plan submitted with the current application promises exactly the same. Where is the evidence that any of these actions have been taken?

How can the Planning Authority seriously accept documents like this which have no substance?

Even elsewhere in the application there is no information as to how the travel plan measures have fared in promoting sustainable transport to the site, and there is no data given from annual travel surveys which would normally form part of such a plan. It is unacceptable that the current application for Phase 2 of the site does not seek to build on previous successes or failures. While the current applicant is technically a separate limited company, Integra 61 (Durham 2) Limited, this is surely not adequate reason. In order to promote sustainable transport in line with Policy 21, the planning authority should require that the final travel plan includes full evidence of the surveys conducted and the success of any measures taken via the existing travel plans for the earlier phases. It should also include a budget, and funded fall-back interventions to be employed if the targets are not met.

Accessibility

Paragraph 5.24 of the Planning Statement, in the section concerned with accessibility by sustainable transport, declares that “the site is located in a highly sustainable location”.

It is now possible to test that claim using the Department for Transport's Connectivity Tool Lite (see <https://connectivity-tool-lite.dft.gov.uk/>). Setting the transport mode to “overall, except driving”, and the destination type to “workplaces”, the area occupied by Integra 61 and the proposed Phase 2 score in the range 42 to 50, which fall between the 10th and 30th percentile. This means that more than seven out of ten workplaces in England are better connected in terms of sustainable transport. The Connectivity Tool does not take into account the *quality* of cycle routes, therefore this assessment may be overly favourable.

The building of the Bowburn Relief Road will improve the connectivity score, but it seems unlikely to push it any higher than the A177 through Bowburn village which sits at around the 40th percentile. By contrast, Durham city centre scores at around the 70th percentile.

Even when considering the score for overall driving connectivity, the site currently sits between the 30th and the 45th percentile, compared with the 75th percentile for Durham city, but the difference in actual score is rather less. This reflects how much more accessible the site is by car, and how challenging it will be to attain significant shift to sustainable modes. It is doubtful that the site can be described as highly sustainable. In fact, it appears to be firmly below the median for England in terms of all forms of connectivity.

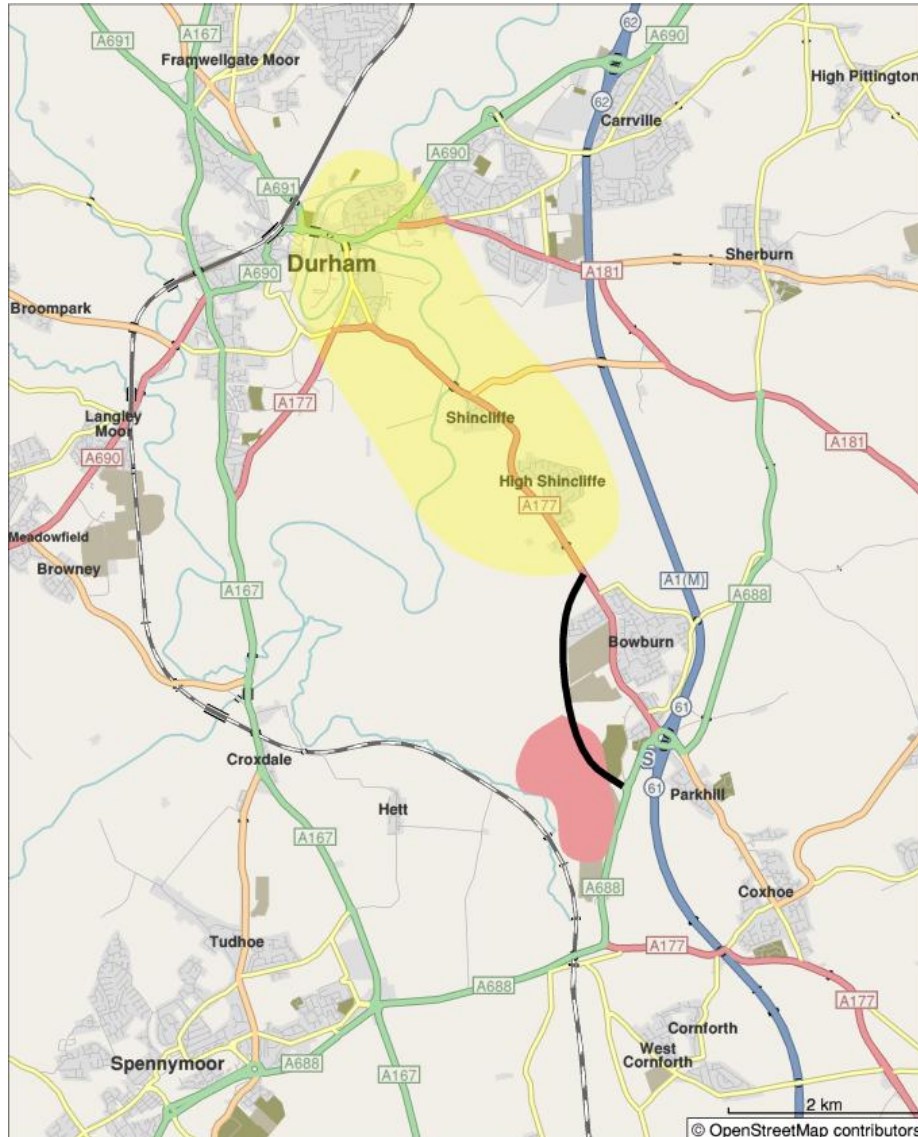
Bowburn Relief Road

The Bowburn Development Road (as referred to in the application) will connect Phase 1 of Integra 61 to the A177 just north of Bowburn village. The applicant has provided, in the Transport Assessment, modelling results and used these to propose a trigger point for the delivery of the new road.

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The Trust is concerned about the potential for the new road to lead to increased traffic passing through Durham City, particularly the Air Quality Management Area.

The following map shows the approximate area of the Integra61 site in pink, and the route of the new road in black. Traffic heading north on this road will continue northwards on the A177 through High Shincliffe and Shincliffe. Some of the traffic may be seeking destinations in those two villages, or in the Elvet area of Durham City. The area shaded pale yellow seeks to indicate the parts of Durham City which



it would be desirable to access via the A177.

For access to Gilesgate or Carrville, the A1(M) or A688/A181 could be used to avoid Durham city centre and the Air Quality Management Area.

Neville's Cross, Framwellgate Moor and other areas north of the city centre could be reached via the A688 to the Thinford roundabout and the A167. Online journey planners suggest that this longer route would only add two minutes to the journey time when traffic is free-flowing.

The challenge will be how to ensure that traffic is encouraged to use the major roads, and avoid the shorter routes through Coxhoe, Bowburn, Shincliffe and Durham city centre. The Trust notes that in the

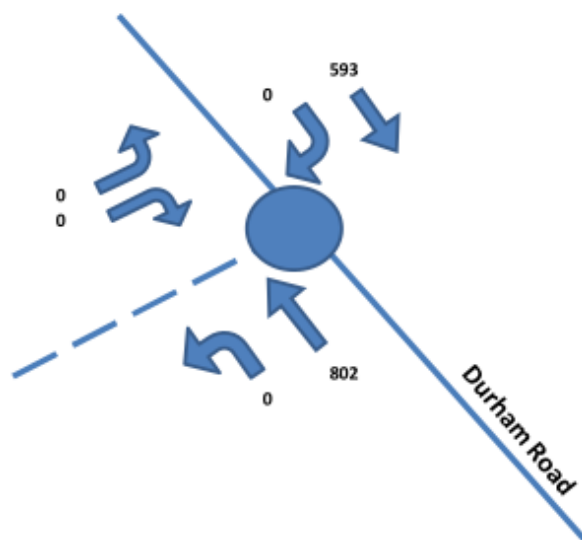
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2037 scenario, the traffic passing southbound on the A177 through Bowburn village, even with the provision of the new road, would represent an 83% increase on current levels. The Trust considers that provision of the new road should be accompanied by traffic calming measures, cycle routes, road space reallocation and reduced speed limits within Bowburn village to discourage additional through traffic and promote sustainable transport.

Road traffic generated

The application includes analysis and modelling of the journeys generated and the junction capacity in the Bowburn area, but does not spell out wider impacts, particularly any effects on Durham City's Air Quality Management Area. Even information on the amount of extra traffic generated is hard to find within the application.

The best clue to the impact on Durham City is found in the Appendices to Chapter E, at Appendix G of the Transport Assessment (pages 550 onwards of the PDF). These consist of schematic diagrams of the surrounding road network, with turn counts for all approaches to junctions. This excerpt shows the baseline 2025 morning peak movements at the site of the proposed junction between the A177 and the new road north of Bowburn village:



The morning and evening peak figures are based on actual surveys in 2025. These diagrams are followed by modelled outcomes showing traffic levels at various stages of development of the site, with and without provision of the new road.

2025 Baseline	Morning peak	Evening peak
Northbound	802	635
Southbound	593	809
Total	1395	1444

Pages 553 and 554 show the estimated extra traffic generated by development which has already received planning approval, including the rest of Phase 1 of Integra 61, and some housing developments in the Bowburn/Coxhoe area. These impacts have already been judged to be acceptable:

Committed development	Morning peak	Evening peak
Northbound	47	107
Southbound	116	62

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Total	163	169
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Pages 555 and 556 show the extra traffic expected to be generated by the current application:

Current application	Morning peak	Evening peak
Northbound	63	224
Southbound	229	56
Total	292	280

It will be seen that while the current traffic on the A177 is predominantly towards Durham City in the morning, and away from Durham in the evening, the additional traffic generated by the committed and the proposed development is mainly away from Durham in the morning peak and towards Durham in the evening peak.

Subsequent pages combine these estimates with scenarios with and without the new road, and with 2029 and 2037 baseline traffic increases.

The projected increase in traffic from committed developments is 12% in the morning peak and 12% in the evening (taking the total PCU figures for each direction).

On top of that the proposed development would cause a further 19% increase in traffic in the morning peak and 17% in the evening. Altogether this will represent a 33% increase in morning peak traffic and 31% in the evening over the 2025 baseline survey.

Clearly the development will have a considerable impact on traffic levels on the A177 heading to and from High Shincliffe. An unknown proportion of these journeys will continue into Durham City and the Air Quality Management Area.

Indeed, by examining page 559 it is possible to say that 31% of the extra traffic generated by the development travelling to Integra 61 in the morning peak is expected to use the A177. This underlines the need to provide additional bus routes and a continuous safe cycle route all the way to Durham City to mitigate what would otherwise be an unacceptable impact.

Note that because the transport assessment is “vision-led” the consultants have allowed themselves the liberty of reducing the Passenger Car Units of traffic generated with the assumption that their travel plan and other promotional activities will be successful. There are few grounds for optimism on this score considering the lack of evidence of any success in the first phase and the poor connectivity of the site.

Other limitations of the analysis include:

- ⑩ The models are limited to the immediate area, and do not account for whether opening the new road might cause some traffic that currently uses the A688 northbound to divert onto the A177 and through Durham City. There is a risk of such effects.
- ⑩ It is not obvious from the documentation what proportion of the extra traffic will be commercial vehicles such as delivery vans and HGVs.

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Conclusion

The Trust asks that determination of the application be deferred until the matters objected to can be addressed, through the provision of additional documentation and appropriate conditions or Section 106 contributions.

Yours sincerely,

John Lowe
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