



Planning - Central/East  
Planning Development (Central/East)  
PO Box 616  
Durham  
DH1 9HY

11 May 2014

For the attention of Mr Peter Herbert, case officer.  
peter.herbert@durham.gov.uk

Dear Mr Herbert,

**Re: PLANNING APPLICATION NO CE/13/01696/FPA**

**Conversion of former hospital and its extension to form 82 student studios, erection of student accommodation buildings to include 308 bedrooms, demolition of outbuildings and extensions, and cycle storage, parking and altered site access, by Peveril Securities.**

I am writing on behalf of the Durham University Bicycle User Group (DBUG), which has a membership of around 300 cyclists drawn from staff and students based in Durham.

Thank you for notifying us of the deposit of revised proposals for the above planning application. We have a few comments to make on the revised application, but in essence all of our previous comments still stand.

### **Cycle Parking Provision**

The previous proposals provided 90 cycle parking spaces for 440 students and their guests. The developer pointed out that this exceeded the guidance laid down in the Durham County Council Accessibility & Parking Guidelines 2003 (DCCAPG) but in fact it only did so by 2 places.

In our previous submission, we pointed out that the guidance in DCCAPG is self-contradictory and also somewhat out of date. We recommended that the Planning Authority require a ratio of 1 cycle parking space per 2 student residents, which fits with BREEAM recommendations and with more recently revised council policies such as those of Cambridge City Council and Transport for London.

Paragraph 3.8 of the Revised Planning Statement states that "Comprehensive cycle storage will also be provided". We have not found any further reference to cycle storage in the revised documents, but the Revised Proposed Site Plan shows 39 cycle stands, mainly dispersed round the rear of the old hospital building, but with a few near the new build.

It is interesting to note that the revised application accommodates 390 students, so the 39 stands (providing 78 cycle parking spaces) would exactly match the minimum provision suggested by the DCCAPG document of 1 place per 5 occupants.

So despite having previously found space for 90 cycle spaces, and despite doubts expressed by cyclists about whether this number was sufficient, the number of places has been reduced.

Applying the standards we recommended would require provision of around 195 covered and secure cycle parking spaces for residents, and preferably additional spaces for visitors.

We note that in paragraph 5.22 of the revised planning statement the developer states that a BREEAM 'very good' rating is being targeted. We have reviewed the BREEAM pre-assessment documents that were provided in January and note that the section relating to cycle parking facilities is provisionally awarding the development full marks for cycle parking. This could not be attained with the plans either in their original or their current form, as the BREEAM cycle parking requirements are based on a ratio of 1 place per 2 occupants, not 1 place per 5. This shows that the BREEAM pre-assessment is perhaps rather superficial and optimistic. The Planning Authority should therefore treat the developer's assertions with caution when judging whether the development meets the NPPF test for being a sustainable development.

In section 4.8 of the revised planning statement the developer seeks to minimise the status of the current development plan (City of Durham Local Plan 2004) in view of its age. This argument would also support rejection of the 2003 DCCAPG guidance for cycle parking spaces and requiring a larger number of spaces in accordance with widely recognised environmental standards such as BREEAM.

### **Cycle parking location**

Our previous comments about the undesirable positioning of the cycle parking at the back of the site, far from the building entrances, still apply.

### **Access to the site**

Since our previous letter, the Council's proposals on the relocation of the bus station have been published. According to the current bus station proposals, vehicular traffic coming from Neville's Cross on the A690 wanting to head north along North Road or to go to the railway station would no longer be able to turn left at the site of the current roundabout and so would have to use Sutton Street. Such traffic will therefore come past the County Hospital site to the junction with North Road. Sutton Street is currently relatively quiet for a city centre road and will see a massive increase in motor traffic.

The planning application for the County Hospital with everyone accessing the site via the one entrance adjacent to the Sutton Street / North Road junction does not take account of the likely increase in traffic caused by the bus station relocation.

Now that the new-build element of the development has been split into two buildings, it would be easier to provide an alternative access to the development from a gate at the corner of Waddington Street and Sutton Street, for example, avoiding the awkward need for two right turns in quick succession if heading towards the university via the existing access drive.

A pedestrian and cyclist only access, located approximately on the position of the existing unused gate to Waddington Street, with appropriate treatments to facilitate crossing Waddington Street and Flass Street, would be a much better solution and would undoubtedly be popular with residents of the development as it puts them on the desire line to the University via Margery Lane rather than forcing them out of their way to get back to the same point.

We would ask that such alternative access to the site be provided, preferably in conjunction with secure cycle parking in a basement of the new build.

### **Infrastructure connections with the University**

While the bus station relocation proposals improve pedestrian access from the development to amenities in North Road, cyclist access would be worsened. Safe, direct access by bike to the town centre from the County Hospital and other housing areas beyond the viaduct needs to be substantially enhanced.

Our previous submission otherwise still stands in respect of routes from the proposed development to the university.

Yours sincerely,

Matthew Phillips