

DURHAM CITY NEIGHBOURHOOD PLANNING FORUM



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Mr Henry Jones  
Development Management Team  
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Dear Mr Jones

**Planning Application DM/17/01682/FPA  
Construction of a new Teaching and Learning Centre  
with associated landscaping and access at St Mary's Field, South Road**

The Durham City Neighbourhood Planning Forum has prepared a Draft Neighbourhood Plan which recognises the great significance of the University of Durham's Masterplan proposals for growth. As the overall Masterplan has not been submitted for formal evaluation by the Local Planning Authority, we are of necessity required to make representations to the County Council on a case by case basis; St Mary's Field is the first such case.

The Durham City Draft Neighbourhood Plan makes no conflicting proposals for St Mary's Field and therefore the principle of appropriate University development on this site is accepted. We are aware of the submissions made by the City of Durham Trust and we endorse those representations.

However, we are, amongst many other considerations, concerned about the adequacy of the city's infrastructure to cope with the traffic that will be generated under the Masterplan's proposals. In particular, there are severe existing problems in relation to pedestrian and cycling capacity in several parts of the network, and the South Road section is one of the most pressing.

As an example of the realities of living with what can be called tsunamis of young adults pouring along the pavements to and from lectures, we have from our public consultations during preparation of the Neighbourhood Plan the St. Oswald's Reception (5 years old) pupil's comment about feeling unsafe when he arrives and leaves school because of the volume of students who simply don't notice there are smaller pedestrians using the pavements too and he gets jostled about. The safety of the St. Oswald's pupils and the Durham school pupils on Margery Lane is just one of so many concerns.

Accordingly, we have carried out a detailed analysis of the traffic and transport aspects of the University's proposals at St Mary's Field, calculating the likely trip generation from first principles. This is attached. You will see that the conclusion is that the traffic impact is grossly underestimated by the University's consultants; that a revised Transport Statement is necessary on this and other grounds; that that the development is not compliant with saved policy T1 and with NPPF paragraph 32; and that any approval for the proposed development of St Mary's Field must include planning obligations for convenient and safe pedestrian and cycling routes through the University's own land.

Consequently we conclude that unless a revised Transport Statement is forthcoming, addressing all of these issues, this application must be refused.

Yours sincerely

Roger Cornwell  
Chair, Durham City Neighbourhood Planning Forum

**Planning Application DM/17/01682/FPA:  
Comments of the Durham City Neighbourhood Planning Forum  
on the Transport Statement prepared by Cundall Johnston & Partners**

The Transport Statement was prepared by Cundall Johnston & Partners. Essentially, its conclusions are that the building will have minimal impact on the transport infrastructure. The Durham City Neighbourhood Planning Forum considers this to be grossly mistaken, for the reasons set out below.

**Capacity of the building**

The Transport Statement notes in paragraph 3.1 that the building has an “*approximate gross floor area of 8,150m<sup>2</sup>, with a maximum design capacity of 2,000 people (students and staff)*”. This assumes that the building would operate at 100%. Durham University’s position is that the facility will operate at 80% capacity which would equate to 1,600 people. Our calculations will be based on this lower figure.

In section 4.1 of the Transport Statement the consultants have identified what they claim to be appropriate comparable buildings in the TRICS database and, based on the floor area, they estimate a total of 321 people arriving in the morning peak (8am to 9am) and 330 leaving in the evening peak (which they suggest is 4pm to 5pm). Such a small number of people arriving for 9 o'clock lectures seem most unlikely, as follows.

In the Planning Statement, paragraph 3.25 states that the building would include lecture theatres with capacity 500 and 250. These are readily identified on the plans: there is one of each. Paragraph 3.35 mentions 25, 40, 60 and 80 person classrooms and Technology Enabled Active Learning spaces (TEAL, capacity not stated). If we assume that the smallest seminar rooms are those with capacity 25, there are two on the ground floor and two on the first floor, giving a total capacity of 100 people. The other teaching rooms on the first floor (including those labelled TEAL) come in various sizes, two of each, so we can assume a capacity of 40+60+80 doubled, which is 360.

Thus the lecture theatres, seminar rooms and teaching rooms have a capacity in total of 1,210. There may be more timetabled capacity than this because of the computer labs on the ground floor, which might also be used for formal teaching.

It is reasonably safe to assume that the University will wish to use the new building intensively to maximise the return on investment. Indeed, if the building is not to be used to the full, then it might be questioned whether such a large building is appropriate in planning terms. Paragraph 3.14 of the Planning Statement says that the building will facilitate 20% of all formal teaching in the University, and paragraph 3.25 states that the design allows for 500 hours of teaching to be delivered per week. Across the 12 teaching spaces identified

above that means 41 hours of teaching per room. If we include the computer labs (3), that brings the figure down to 33 hours per room.

Thus the information before us suggests that it is likely that all of the rooms will be used for teaching on weekdays for most of the working day. If we allow for an 80% utilisation of the building it is reasonable to expect 968 students to be arriving at the building in time for the start of the teaching day at 9am, and additionally a certain number of staff. This is three times the number estimated by the consultants. This is a conservative estimate: the figure could well be higher because of the 450 additional study spaces (on the top floor), and 200 additional seats for catering which are mentioned in paragraph 3.25 of the Planning Statement.

### **Modal split**

In section 4.1.1 of the Transport Statement, the consultants attempt to estimate how many people will arrive on foot, by bicycle, public transport or car. The walking share for students is put at only 70%. In fact the 2013 student survey puts the Durham figure at 82% of students walking to the University.

Next, the consultants use the fact that the development does not include car parking to justify redistributing the car share among other modes. This is hard to justify. They are ignoring the 60% of staff who drive and the literally hundreds of students who bring cars to Durham and find places to park somewhere.

### **Impact of pedestrian traffic**

To assess the impact of additional pedestrian traffic on the surrounding area, the estimated figures for the peak hours for public transport are added to the walking estimates to reflect the need to walk from bus stops in Church Street and elsewhere. A figure of 303 trips in the morning peak, and 349 in the evening, is the result.

The consultants then make the astonishing claim that their estimate of the morning peak of 303 trips *“equates to approximately 6 additional pedestrians per minute on the local pedestrian network, which is negligible in terms of footway capacity following on site observations. It is considered that these additional trips can be accommodated within the pedestrian infrastructure surrounding the site.”*

This conclusion is frankly ludicrous as it spreads peak traffic evenly throughout the hour. Anyone who has observed pedestrian flows for lectures in Durham knows that these are clustered according to the start and end of lectures, which are on the hour in the mornings. Indeed, this is confirmed by the consultants' own survey of the pedestrian crossing traffic in Appendix C, where 56% of the activity in the peak morning hour is between 8:50am and 9am.

By comparison, let us take the estimate of 968 students arriving at the morning peak. According to the 2013 student survey 82% of students in Durham walk, and 6% use public transport. Adding these gives 88% which represents 852 students arriving at the new building on foot, plus some staff.

Using our figure of 852 students arriving on foot, we would expect well over half of these to arrive in the last ten minutes before 9am - conservatively, something like 450 or 45 per minute. This quantity of additional pedestrian traffic is far from “negligible”.

Transport for London guidelines on pedestrian highway capacity (*Pedestrian comfort guidance for London*, Transport for London, 2010, <http://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>) give tables advising on suitable footway widths for different levels of pedestrian flow. This is the methodology which DCC recommended Cundall apply to assess pedestrian capacity and comfort in the case of the Maiden Castle sports centre extension. The guidelines recommend a maximum of 17 people per minute per metre width (unobstructed by street furniture). While the planning application proposes widening the footway on the west side of South Road, no commitment has been given to dealing with other footways to mitigate the effects of this planning application on local infrastructure, which have been significantly underplayed by the consultants.

Indeed, at present on Margery Lane and Quarryheads Lane, peak flows sometimes reach 35 people per minute per metre width, a level which the TfL guidelines describe as follows: *“people have very little personal space and speed and movement is very restricted. Extreme difficulties are experienced if moving in reverse flows”*. This is already the case on routes such as Margery Lane and Church Street. St. Oswald’s Primary School is a major consideration as it has recently expanded, and so they have more pupils across the school and more pupils using their nursery and out of hours school care which has increased the footfall to the premises. If a further 15 or 20 people per minute is added to each route as a result of this development, major investment will be necessary, and it should not be up to the local council tax payer (none of whom are students) to foot the entire bill.

The current volumes of pedestrian traffic are already an issue at the New Inn crossroads. The pedestrian crossings there cannot cope with the time needed for complex traffic flows to be resolved and the pressure of people needing to cross to and from the South Road Campus and the Hill Colleges to University Departments in New Elvet and the Peninsula. A full cycle of traffic light phases take such a length of time that people accumulate on the traffic islands such as to overflow into the road. Significant improvements will need to be made to provide safe and speedy pedestrian flows at the New Inn Stockton Road/South Road/Church Street crossroads.

It is clear that the development is not compliant with saved policy T1, which, as quoted in the applicant's planning statement in paragraph 4.34 "*notes that the Council will not permit a development that generates traffic which would be detrimental to highway safety or have a significant impact on the local residents*". This would include pedestrian traffic. The cumulative residual transport impact of the development could be said to be severe, and thus it would be allowable under Paragraph 32 of the NPPF to reject the application on transport grounds alone.

Clearly this application is vital to the desire of the University to expand its teaching provision to allow for a 40% increase in students in Durham. It will be argued that substantial economic benefits will accrue from this expansion, but if this application is to be approved much more mitigation of the transport impacts is required.

### **Other flaws in the Transport Statement**

The gross underestimate of pedestrian impact should be enough to reject the planning application in its current form: a revised Transport Statement must be prepared to deal with its current shortcomings. For the record, these include many inaccuracies; some examples are as follows.

#### ***Pedestrian accessibility (section 2.2.1)***

A map is included showing the areas within 5 minute, 10 minute or 20 minute walks from the site. The map clearly has only taken account of the highway network, and has not included footpaths, even substantial lit routes like Prebends Bridge. This is to some extent acknowledged via a separate map of public rights of way in section 2.2.2. There is no assessment of whether the highway network is safe or convenient for pedestrians to use, and whether there is spare capacity.

#### ***Bus services (section 2.4.1)***

The nearest bus stops are stated as being on Quarryheads Lane and Church Street. The Quarryheads Lane stops, however, are redundant and not served by any buses. In the accompanying table of bus services the X21 bus is listed, despite it being routed via Church Street and South Road only on Sundays and in the evenings after 8pm.

#### ***Local highway network (section 2.6)***

The report notes that the northbound lane of South Road sees substantial queues during the morning and evening peaks. "*The queue lengths at times would exceed 200m in length.*" Indeed, they are very often double that or more. Queues westbound on the Stockton Road can tail back to the roundabout junction with Hallgarth Street or further, especially in the evening peak, and queues eastbound on Quarryheads Lane are often 300m long or more, but none of these are noted: it seems the consultants have confined their observations just to the stretch of road immediately adjacent to the proposed development site.

### **Public transport impact (section 5.3)**

Again by spreading peak trips evenly across the hour, the consultants conclude that: *“the anticipated generated trips will not have a detrimental impact on the operation of existing public transport services and Cundall understand that there is sufficient capacity to accommodate the proposed generations.”* The fact of the matter is that free travel for students on certain services means that some peak time buses are already so full of students travelling to the New Inn for the South Road campus that residents are unable to get on them.

### **Cycling provision**

It was noted at the public consultation that the cycle parking is proposed to be located at the rear of the building, contrary to Durham County Council’s parking and accessibility guidelines:

DCC policy, *Parking and Accessibility Guidelines*, 2014 states (p.9):

*Cycle parking is to be covered and secure at or near the front of premises. Placing cycle or P2W parking as an afterthought to the rear of premises at insecure positions which are not observed or within sight of regular users will not be accepted. Cycle or P2W parking beneath stair wells or behind buildings away from the central access to buildings will not be accepted.*

There would appear to be no difficulty in locating all or the majority of the cycle parking at the front of the building as the plans show a wide area between South Road and the main entrance.

### **Cycle accessibility**

In Section 2.3 of the Transport Statement, cycle accessibility is shown on a map showing the area within 5km of the site. Cycle paths are overlaid. Paragraph 2.3 states *“A network of cycle routes is provided throughout Durham comprising a mixture of on-road and off-road facilities”* but the map makes it clear that this “network” does not join up, and that there are very few cycle routes coming close to the St Mary’s Field site.

The end of paragraph 2.3 of the Transport Statement (page 7) states:

*“South Road is suitable for cyclists to access the site with an approximate width of 7.5m allowing suitable space for a car to overtake a bike.”*

Actually, a carriageway width of 7.5m is dangerous for cycling. While the standard lane width is 3.65m (12 feet), lane widths between 3.2m and 3.9m are considered dangerous because motorists may be tempted to overtake cyclists within lane, not giving sufficient safe clearance. Paragraph 6.14.5 of the Active Travel (Wales) Act Design Guidance states:

*“Where lane widths are in the critical range of 3.2m to 3.9m given in Chapter 4, conditions will be unsuitable for cycling on the carriageway unless traffic speeds and volumes are low so that drivers can cross easily into the opposing lane to pass a cyclist comfortably.”*

From paragraph 4.18.8:

*“Designers should therefore not use 7.3m wide carriageways for active travel routes unless cyclists are accommodated outside the carriageway, or traffic volumes are low.”*

With the traffic volumes on South Road at present, it is common at peak times for cars to be unable to use the opposing lane to pass cyclists. Therefore South Road at present is would not be considered suitable to access the site by bicycle, and alternatives should be identified.

Aside from on-carriageway improvements in the approaches to the site in collaboration with the County Council (which must include Margery Lane and Church Street as well as South Road) the University has the opportunity to create traffic-free routes through its own land, such as across St Mary's College to the junction of Potters Bank and Elvet Hill Road, or through to Mill Hill Lane parallel to South Road. Such provision would improve the quality of the campus, allowing students, staff and local people active travel opportunities away from the main arterial roads with their air quality issues. The County Council should be seeking such measures through planning obligations as a condition of approving this and other planning applications that contribute to the University's Masterplan.

Roger Cornwell  
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