

Table 1: Comments received in response to public consultation on the updated SPD

Respondent	Comment	DCC Response
Miller Homes (James Reid – 1256137)	<p>Miller Homes are a national housebuilder who are involved in the delivery of a number of strategic housing sites within County Durham, including Seaham Garden Village. As such, our client is a key stakeholder in bringing forward new homes for County Durham and have an active interest in ensuring any SPDs prepared by Durham County Council (the Council) are suitably robust, consistent with National Planning Policy and National Planning Guidance, and that the SPDs will not unduly hamper the delivery of new homes to meet arising needs.</p> <p>Having considered this SPD in particular, there are a number of areas where we consider it is inconsistent with national policy and guidance. Where this is the case, we have highlighted what should be undertaken to rectify this.</p> <p>General Comments</p> <p>For all of the SPDs which are currently being consulted on, clarity would be welcomed in regard to the point at which the policies in the SPDs are applied to planning applications. In particular, there will be circumstances where overarching outline planning permissions have been granted with detailed Design Codes, yet the reserved matters have not yet been submitted/determined. It is important that these proposed emerging policies do not compromise the delivery of those reserved matters, whereby the principle of development and detailed design guidance was determined in a different policy context. It is important that this point is acknowledged in the SPD to assist developers/ officers when preparing/ determining applications.</p> <p>Supplementary planning documents should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development (Reference ID: 61-008-20190315, emphasis added).</p>	<p>Supplementary Planning Documents will be applied to relevant planning applications as soon as they are adopted. Where design work is at the outline stage, there are still opportunities to incorporate the requirements set down within the Design Code SPD and consideration will therefore be given to these requirements.</p> <p>The Council are aware of the scope for Supplementary Planning Documents. The Design Code is connected to Policy 29 of the County Durham Plan and responds to a requirement set down within national planning policy. It is not considered to add a financial burden to development proposals, rather it is intended to ensure better design outcomes in accordance with policy objectives.</p> <p>The Council's Design Code SPD is supported by a substantial evidence base relating to character, landscape and development morphology. The Design Code sets down a framework and approach to enable developers to create their own design response and/or code, depending upon scale and complexity of development and setting. Settlement Character Studies will augment the Design Code and provide an extra layer of detail, however they are not an essential element to the Design Code as the approach and methodology to site and context analysis is set down in the SPD itself. The project to prepare Settlement Character Studies will likely be a long-running programme given the scale of the County and is not something that will delay preparation of the SPD.</p> <p>In relation to coding plans, the Council's Design Code SPD clearly states that it applies to the whole of the County. A Coding Plan would only be required if specific parts of the County were covered by the SPD.</p> <p>The SPD includes a Model Code methodology which provides examples for the typical range of settlement types found in the County. It sets down characteristics typical of a settlement depending upon typology (i.e. 20<sup>th</sup> Century New Towns, 19<sup>th</sup> Century Industrial Towns, Historic Villages, etc). On page 13 there is a list which categorises each settlement by typology. The Model Code demonstrates how a developer should analyse a site and settlement context, including around identifying the 'character' of the</p>

<p>Overarching Comments</p> <p>The County Durham Design Code Supplementary Planning Document (the Draft Design Code SPD) has been produced and published for consultation in advance of the production of the supporting evidence base (Settlement Character Studies). The SPD states that the Character Studies are a key evidence base for understanding the character of the settlements', however the Design Code has been produced without this evidence base being carried out.</p> <p>The National Model Design Code (NMDC) states that local planning authorities will need to have an understanding of their area informed by up-to-date evidence such as characterisation studies or site analysis to support design coding. Furthermore, the NMDC states that Design Codes should be prepared on the basis of evidence and design policies should be grounded in an understanding and evaluation of each area's defining characteristic. Step 1B of the NMDC requires that baseline evidence is gathered to inform the content of the code.</p> <p>The failure to provide a sound evidence base for the Design Code SPD does not conform with the guidance set out within the NMDC and raises questions on the validity of the Principles/Checklists set out within the Design Code SPD.</p> <p>The NMDC clearly states that when preparing Design Codes, a Coding Plan will be required to identify the existing built-up area to be covered by the code and provides an example based upon area types. In the Design Code SPD's current format, a coding plan has not been provided, when this is considered in combination with the lack of Character Studies evidence base, questions are raised as to what areas the code is applicable to and which area type development sites would sit within. The Design Code SPD is therefore not in accordance with the NMDC.</p> <p>The example Character Areas Study of Newton Aycliffe provides multiple sub areas and associated mapping allowing for identification of future development proposals, however with the relevant Character Studies for the remainder of the county not being provided, there is no clarification on which 'sub character' a site would sit within.</p>	<p>particular site, for example whether it is in the historic core, suburbs or edge of settlement.</p> <p>The Model Code included in the SPD sets down the characteristics that are typical of different types of settlement in County Durham. The aim of the SPD is to ensure well-designed places, which means that the development responds to context in an appropriate way. This is clarified within the SPD, for example where it states "Well-designed places and buildings often come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. This explains how the concept influences the layout, form, appearance and details of the proposed development. It may draw its inspiration from the site, its surroundings or a wider context. It may also introduce new approaches to contrast with, or complement, its context." Nevertheless, it is considered that this point in particular could be clearer and appropriate amendments have been made to achieve this.</p> <p>The SPD does not set 'prescriptive densities and plot sizes'. The approach set down within the Design Code is around ensuring an appropriate design response that is suitable to context; this should include analysis of factors such as densities and plot sizes, amongst a range of other matters which are set down in the SPD for guidance purposes.</p> <p>With regards to detailed comments relating to the code, including number of storeys, the text has been amended to provide a greater degree of flexibility, however the model code provides a starting point and methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to detailed comments relating to the code, including in relation to car parking, the text has been amended to provide a greater degree of flexibility, however the model code provides a starting point and methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p>
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<p>The Draft Design Code SPD should include reference to the fact that incorporating local characteristics is not always an appropriate design response, particularly in areas with limited positive characteristics or where a contemporary design is being proposed. Building for a Healthy Life advises that proposals should avoid the use of poor or generic elements of local context and avoid the creation of character through poor replication of architectural features or details. The SPD therefore needs amending to include reference to the above and ensure that, where appropriate, the interpretation of local architectural elements would result in the betterment of design proposals and sit well within the overarching character being proposed.</p> <p>Finally, it is also important to note that the design requirements set out in this draft SPD could potentially have an impact on the viability of developments and their delivery. For example, setting prescriptive densities and plot sizes can significantly impact the viability of a scheme and other planning considerations should help determine such standards for a development (i.e. Section 11 of the NPPF - Making effective use land). Viability has not been considered within this SPD and the design requirements are also not considered in the Draft Viability SPD. Both should be updated accordingly to ensure there is some flexibility in the proposed design requirements to account for viability.</p> <p>It is therefore clear that further work is required for the SPD to be properly scrutinised, and it is considered that once this information is available, further consultation should be undertaken. Nevertheless, for completeness and without prejudice, we comment on key areas of the Draft Design Code SPD below.</p> <p>Historic Towns and Cities Principles/Checklists</p> <p>The Building Form and height checklist on the settlement edges states that 1 and 2 storey buildings are considered appropriate particularly at the edge of the settlement with some variation in building form capable of being introduced. The principles do not allow for sufficient variation for the creation of multiple characters within large-scale developments on the edge of historic towns or cities. Variations in scale are key to aiding legibility and the creation of a sense of place on medium/large residential developments.</p>	<p>With regards to detailed comments relating to the code, including in relation to private amenity space to front elevations, it is considered that this provides a useful starting point for layout design and ensuring conformity with separation standards set down in the Residential Amenity Standards SPD. The model code provides a methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to detailed comments relating to the code, including in relation to height and materials palette, including within historic villages, the SPD states that contemporary materials and detailing will be assessed on a site by site basis.</p> <p>With regards to detailed comments relating to the code, including number of storeys, the text has been amended to provide a greater degree of flexibility.</p> <p>The SPD is intended as a useful tool for applicants to ensure the proposal positively responds to all aspects of the code, and is therefore supportive of innovation and imaginative design responses.</p> <p>In relation to specific terminology within the code, for example the identification of 'long' and 'linear' driveways and rear gardens, this is to describe the proportions and overall character only. Amenity space, such as rear garden provision, should be suited to context and conform with the requirements set down in the Residential Amenity Standards SPD.</p> <p>With regards to detailed comments relating to the code, including number of storeys, the text has been amended to provide a greater degree of flexibility.</p> <p>With regards to garden villages and urban extensions these would be designed around a clear design concept relevant to the site, which may draw its inspiration from the site, its surroundings or a wider context. It may also introduce new approaches to contrast with, or complement, its context.</p> <p>With regards to standard designs the SPD guides that contemporary interpretations of local detailing should be utilised, avoiding the use of</p>
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<p>The National Planning Policy Framework (NPPF) and NMDC state that there should be scope for the flexible application of Design Codes to allow for Innovation. We therefore consider that additional flexibility is needed in these areas.</p> <p>The Parking Checklist for medium/large development sites states that parking should be positioned adjacent to areas of private landscaped spaces and screened with eye level hedges. A broad-brush approach of parking being located adjacent to private amenity space and screened by hedging does not allow for variation within street typologies across large scale residential developments and will impact upon the creation of characters across proposals. The NMDC states that Design Codes should provide for scope for flexible application which would not be possible with the restrictive nature of these principles. This flexibility should there be applied in this SPD.</p> <p>Within the Landscaping and Open Space Checklist for medium/large developments there is a stipulation that the front of dwelling private amenity spaces should be at least 5m in depth. The inclusion of this principle would not allow for the creation of a variety street typologies across larger residential development sites. The inclusion of varying building setbacks and defensible spaces is key to creating changes in character and street treatment. Paragraph 18 of the NMDC states that ‘Design guides and codes should provide clear parameters within which there is scope for flexible application to allow for innovation’. A range of front of plot private amenity spaces should be allowed for within the Design Code SPD for medium/large residential developments. It is considered that this should be reflected in the SPD.</p> <p>Historic villages</p> <p>Flexibility should be included within the built form section of the General Principles Checklist to allow for variations in height and materials palette for a sympathetic cotemporary architectural style. The National Design Guide states that new approaches which contrast with, or complement, its context should be introduced in new developments. The reference images provided with the SPD include illustrative examples of contemporary material palettes (Channels, Chelmsford) and variations in scale to that of the existing built</p>	<p>standard house types to ensure development. Whilst the Council appreciate volume builders derive efficiencies through standardised products, this needn’t run counter to the objectives set down in the SPD, which are consistent with the aims of local and national policy. The objective is to ensure high quality development that responds to setting and context in an appropriate way, which may include variation in materials and detailing.</p> <p>With regards to prescription around parking, as with the rest of the information included in the model code, this is intended as good practice guidance (and not prescription) for ensuring well designed development. The introduction section for the model codes states, amongst other things, that whilst the SPD provides guidance on a wide range of issues, some may not be appropriate to all developments.</p> <p>With regards to prescription around front of dwelling amenity space, as with the rest of the information included in the model code, this is intended as good practice guidance (and not prescription) for ensuring well designed development. The introduction section for the model codes states, amongst other things, that whilst the SPD provides guidance on a wide range of issues, some may not be appropriate to all developments.</p> <p>Comment noted, however whilst an exhaustive set of examples is not provided in the model code, a balance has been struck to ensure a typical range of examples are included, and the approach and methodology set down in the SPD are applicable to all types and locations for development.</p>
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form (Hexham and Temple Cloud), however this is not included within the associated checklist. This therefore needs to be rectified for consistency.

#### Estate Villages

Within the General Principles Checklist for this typology, the built form principle limits development heights to 1 to 2 storeys and does not allow for increases in scale. Historic properties are generally constructed to greater proportions than modern properties and to ensure a proposed development relates to a historic property, increases in scale over 2 storeys should be permitted.

Development proposals which are of a large enough scale to warrant their own character, for instance Lampton Park (which is included as a reference image), would also not be able to include variations in scale which are key to aiding legibility and the creation of a sense of place on medium/large residential developments. The NPPF and NMDC state that there should be scope for the flexible application of Design Codes to allow for innovation and this should be referenced in the SPD.

#### 19th Century Industrial Towns

The Plan Form Principles establishes that developments at the settlement edge should provide 'long private rear gardens'. A definition of 'long' is not provided within the document and is ambiguous. Long gardens are not identified within the 'understanding of context' as a characteristic of the existing built form for this area typology and the basis for the principle is unclear. The inclusion of 'long gardens' within new proposals would result in oversized development blocks, plot inefficiencies, lower densities and ultimately the viability of proposals. This does not accord with the NPPF which sets out within Paragraph 130 that development should be sympathetic to local character whilst not discouraging appropriate change, such as increased densities. Furthermore, section 11 of the NPPF also states that decisions should support development which make the efficient use of land and design codes should be used to 'help ensure that land is used efficiently'. The Design Code SPD should therefore recognise that private amenity spaces should be proportionate to the property typologies provided within a site and consistent with a proposal's character area.

	<p>The Building Form and height checklist on the settlement edges states that 1 and 2 storey buildings are considered appropriate particularly at the edge of the settlement with some variation in building form can be introduced. The principles do not allow for sufficient variation for the creation of multiple characters within large-scale developments (such as Local Plan allocations on the edge of existing settlements). Variations in scale are key to aiding legibility and the creation of a sense of place on medium/large residential developments. The NPPF and NMDC state that there should be scope for the flexible application of Design Codes to allow for Innovation. The National Design Guide (NDG) also highlights that where larger scale new developments, such as garden villages or urban extensions, may benefit from a variety of characters so that different areas or neighbourhoods each have their own identity. The inclusion of the principle to limit development to 1 or 2 storeys on medium/large developments site would go against the NDG and have implications on the delivery of well-designed places. It is therefore considered that the SPD should be amended so it is consistent with the NDG in this regard.</p> <p>The Detailing and Materials Checklist within the Draft Design Code SPD states that the use of standard house type designs or ‘anywhere architecture’ should be avoided. The NDG states that the identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine and how people experience them. It is not just about the buildings or how a place looks, therefore, the built form of proposals should be considered in combination with the proposal as a whole and not just the architectural style.</p> <p>Standard house types can be adapted to reference locality and establish distinctive identities to new communities through variations in materiality and detailing. This process has been established recently on Seaham Garden Village. Building for a Healthy Life (2020) seeks for the creation of a memorable character through drawing inspiration for local architecture, the NDG and NMDC do not make any reference to limiting standard house types. The inclusion of the reference with the Detailing and Materiality Checklist to avoiding standardised house types is therefore considered in excess of national design guidance and does not take into consideration the adaptability of standard house types to local context. The prevention of</p>	
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	<p>standard house types would ultimately prevent large scale developments being brought forward by established house builders who have the experience and resources available to ensure the deliverability of strategic sites. Such a rigid approach is therefore not supported and as such, it is considered amendments are required here to add in flexibility.</p> <p>The Parking Checklist for medium/large development sites states that parking should be positioned adjacent to areas of private landscaped spaces and screened with eye level hedges. As outlined earlier, a broad-brush approach of parking being located adjacent private amenity space and screened by hedging does not allow for variation within street typologies across large scale residential developments and will impact upon the creation of characters across proposals. The NMDC states that Design Codes should provide for scope for flexible application which would not be possible with the restrictive nature of this principle. This part of the SPD therefore needs amending to allow for this flexibility.</p> <p>In a similar manner to earlier parts of the Draft Design Code SPD, within the Landscaping and Open Space Checklist for medium/large developments there is a stipulation that the front of dwelling private amenity spaces should be at least 5m in depth. The inclusion of this principle would not allow for the creation of a variety street typologies across larger residential development sites. The inclusion of varying building setbacks and defensible spaces is key to creating changes in character and street treatment. Paragraph 18 of the NMDC states that ‘Design guides and codes should provide clear parameters within which there is scope for flexible application to allow for innovation,’ a range of front of plot private amenity spaces should be allowed for within the Design Code for medium/large residential developments. This needs to be reflected in the SPD.</p> <p>Summary</p> <p>Whilst our client understand that the need to provide Design Codes to cover specific areas of local planning authorities is now a requirement from Central Government, it is considered that, as presented, the Council's Draft Design Code SPD does not accord with national policy and guidance in the form of the NPPF, NDG and NMDC and where this is the case, we have suggested where changes could be made. More importantly however, the evidence</p>	
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	<p>base to support the SPD is incomplete and so we would anticipate that once this is in place, further consultation will be undertaken.</p> <p>It should also be highlighted that urban extensions and Garden Villages such as Seaham Garden Village are their own entity, separated from the existing built form and do not sit within any of the area types proposed. In the case of Seaham Garden Village outline planning consent has also been approved with an associated detailed Design Code. The principles and checklist set out with the Design Code SPD should therefore not apply to Seaham Garden Village submissions as this would conflict with the approach which has already been accepted by the Council.</p> <p>We trust that these comments will assist in the preparation of, and updates to, the SPDs going forward. As outlined at the beginning of the letter, as a critical partner in the delivery of new homes within County Durham, Miller Homes would welcome the opportunity for further constructive dialogue in relation to the document moving forward.</p>	
<p>Barratt Homes North East (Amy Ward – 1256143)</p>	<p>The aim of the SPD appears to be to provide additional guidance to the development industry on how we can create great places through the creation of character areas reflective of local characteristics. We do not find that the SPD helps in understanding what the Council want to see in terms of design, layout and materials.</p> <p>We have found the Enhanced Design Review process very useful, in terms of being able to sit down with the Urban Designer and discuss the changes necessary to the scheme to make it acceptable in design terms. We welcome the SPD containing a huge variety of materials - however it is important that Durham don't lose sight of what they want to achieve. The Durham vernacular is hugely varied - it is heavily dominated by terraced housing, with outhouses which is not reflective of the product today. Durham must be careful that they are not too prescriptive on materials on site - too many character areas will simply be detrimental to the legibility of the site and bright coloured render whilst appropriate to a tourist driven seaside town is not so in outlying housing.</p>	<p>The SPD aims to guide developers in ensuring proposals are well-designed and suited to context. It is a guidance document and it is not intended to be overly-prescriptive as that would be difficult to achieve in County Durham given the variety of settlements and the scale of the area. Nevertheless it is intended that the SPD sets down a clear process to designing places that respond to setting in an appropriate way, which is achieved by way of understanding the setting. The code section is intended to assist with this. However changes have been made to the presentation of the SPD to aid clarity and help developers use it effectively.</p> <p>The SPD will work alongside a range of documentation and evidence bases, as well as in tandem with our in-house review and enhanced design services.</p> <p>The SPD allows for flexibility of approach including around materiality, however this element should nevertheless respond to context. The example of bright render here is a useful, clear example of an appropriate response to context.</p> <p>With regards to standard designs the SPD guides that contemporary interpretations of local detailing should be utilised, avoiding the use of</p>



<p>The materials to be considered must also be flexible. Material availability is a huge issue affecting the industry and the Council must include flexibility to account for this.</p> <p>We note that the SPD makes no mention of standard product. Durham have raised issues with the use of standard product on our recent planning applications. It is important that the Council recognise the importance of standard product and perhaps this could be added to the SPD:</p> <ul style="list-style-type: none"> <li>• Products that are tested and designed in response to customer feedback</li> <li>• Product that responds to changes in market demand - home working spaces</li> <li>• Speed of build, which has benefits in terms of delivery of housing numbers and delivery of economic benefits</li> <li>• Cost - it is important to note that the Council's own Viability Assessment assumes standard value build</li> </ul> <p>There also needs to be a recognition that good design is not just about the look of houses and materiality. Good design is about well-connected, sustainable development, promoting active lifestyles and a mix of housing.</p> <p>It is also imperative that the SPD recognises that these design requirements sit alongside lots of other policy requirements - energy efficiency, M4(2), NDSS, connectivity, affordable housing, highways requirements etc. All of this adds up and has a huge implication on the viability and deliverability of sites, particularly as design is subjective and cannot be factored in until later in the process, following discussions with the Urban Designer. This is where the SPD needs to be much stronger in what Durham needs to see from applicants.</p> <p>We believe the Design Code needs to be a much more prescriptive tick list of requirements if developers are to be clear on how to comply. Durham states that 'our Design Code is intended for a range of purposes, including as a useful tool kit for developers to help them create better quality development'. The tool kit is not clear to us.</p> <p>We also note that it states 'larger sites, on the other hand, are more likely to impact upon a broader range of design matters and will generally need to</p>	<p>standard house types to ensure development. Whilst the Council appreciate volume builders derive efficiencies through standardised products, this needn't run counter to the objectives set down in the SPD, which are consistent with the aims of local and national policy. The objective is to ensure high quality development that responds to setting and context in an appropriate way, which may include variation in materials and detailing. Furthermore, it is agreed that good design is about a range of factors including those stated and referred to in the SPD.</p> <p>The council take a pro-active approach to working with applicants including helping to guide the design process. It is considered that there are clear design standards, which are not particularly subjective, which should be factored in from the outset when planning a development and needn't impact upon viability if applied judiciously and from the outset. The SPD establishes a clear and consistent methodology to assist with this process, alongside a range of further documentation and services, such as the design review and enhanced design review, which the council provide.</p> <p>The introduction sections for the SPD have been amended to improve clarity and simplify the approach to applying the guide.</p> <p>With regards to text in relation to 'larger sites...', this section of the document has been amended to clarify that this relates to the national 'good design' principles for on page 6 and within the National Design Guide.</p> <p>Comment noted. In respect to NDSS it is considered that the objectives around separation distances and parking can be applied consistently with the aims and objectives set down in the SPD. With regards to clarity, efforts have been made to improve this within the overall presentation of the document.</p>
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	<p>demonstrate that they are meeting all requirements'. In considering compliance the Council need to consider site topography, site constraints that impact on design and viability.</p> <p>The Council must also consider the impact of NDSS on design - it adds in frontage parking, increased separation distances. In essence we feel the Design Code is useful in setting out the different character areas, range of materials, design considerations but it would be useful to contain a tick list of what the Council want to see - number of character areas on sites over certain number of houses etc.</p>	
<p>Bellway Homes (1277333)</p>	<p>The Design Guide SPD is in its first round of consultation. The SPD aims to set guidance to make sure new developments are well designed and well suited to their surrounding area in publishing this document the Council will be fulfilling a requirement outlined in the National Planning Policy Framework, to prepare a design code. The document focuses on residential development but is applicable to most scales and types of development. It is noted that Settlement Character Studies will support the SPD as they are developed, and therefore greater geographic locality specific detail will come forward in due course. However, it has to be accepted that existing character is not always necessarily an aspiration for good design for new developments, and that departure from the existing character can even result in an improvement. Flexibility is therefore required, as long as justification is provided by the developer in a character assessment.</p> <p>Some of the example images are taken from London, Lewisham, York and Cambridge and there needs to be a recognition that County Durham is a very different context in terms of needs, aspirations and viability, as well as the existing character. In its current form, the Design SPD fails to sufficiently acknowledge the viability issues faced across the majority of Durham when it comes to design expectations. That doesn't mean to say that design isn't as important, and Bellway Homes do not object to the principles of good design, but the context of the example scheme images is very different to that of County Durham. This is especially important, factoring in the ongoing viability discussions with regards to the low/medium and even high value areas across the county.</p>	<p>With regards to existing character and whether it is a suitable guide for new development, the SPD states that this will depend upon the individual circumstances of the proposal. The council take a pro-active approach to working with applicants including helping to guide the design process, however this is a collaborative process and the applicant should demonstrate good design in accordance with national and local requirements. The SPD establishes a clear and consistent methodology to assist with this process, alongside a range of further documentation and services, such as the design review and enhanced design review, which the council provide.</p> <p>With regards to photos used in the document are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p> <p>With regards to the design review process this is outside of the scope of the consultation on the SPD. Nevertheless, the Council are committed to working with developers in a consistent and transparent manner and scoring reflects this approach. Separate discussions have been undertaken with the HBF to help refine design review to help resolve issues.</p> <p>It is considered that the Design Code is consistent with the aims of the Parking and Accessibility document, insofar as parking matters in a technical sense are specified in the latter document. The design SPD focusses on</p>

	<p>Speaking more broadly regarding design and the current Design Review Panel process, it is felt that in certain circumstances, the LPA is perhaps not giving credit to some of the positive aspects that developers are agreeing to implement, and that 'red' or 'amber' scores are being given instead of 'green'. This can often misrepresent the efforts gone into improving the design of the scheme and could lead to confusion in situations where a planning committee or planning inspector is making the decision.</p> <p>There is detail on car parking which needs to come forward alongside a sense check with the draft Parking Standards SPD published last year for consultation.</p> <p>There is also very little reference to the changing environmental requirements for housing, for example electric charging, air source heat pumps, PV and sometimes this can mean the design approach cannot be accommodated for example the need for electrical equipment in the roof. Sustainability requirements as a result of the changing environmental context and movement towards net zero must be acknowledged in the SPD and flexibility given towards the design approach.</p>	<p>integration and proposes a range of suggested design responses to help with this depending upon context.</p> <p>With regards to climate considerations, the focus of the SPD is on establishing design codes and ensuring development that is suited to context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p>
Theakston Land (1336303)	<p>Compliance with the National Model Design Code</p> <p>Overall, the Design Code SPD is very text heavy with many written prescriptive elements stating specific requirements. This does not fit with the principles outlined within the National Model Design Code (NMDC) which states that "design codes can provide a more specific steer on what is acceptable when they are visual and numerical rather than relying on detailed policy wording, as well as being easier to engage with".</p> <p>The NMDC also provides Local Authorities with flexibility to determine the level of detail required within the design codes to be determined locally. This confirms that there is no national requirement for a Design Code to be very prescriptive on all elements of design, as per the current draft. This approach limits the scope for innovative or modern designs to be provided within new developments.</p>	<p>The SPD aims to guide developers in ensuring proposals are well-designed and suited to context. It is a guidance document and it is not intended to be overly-prescriptive as that would be difficult to achieve in County Durham given the variety of settlements and the scale of the area. Nevertheless it is intended that the SPD sets down a clear process to designing places that respond to setting in an appropriate way, which is achieved by way of understanding the setting. The 'code' section is intended to assist with this. However changes have been made to the presentation of the SPD to aid clarity and help developers use it effectively. A balance has been struck to ensure a typical range of examples are included, and the approach and methodology set down in the SPD are applicable to all types and locations for development.</p> <p>With regards to a scoping stage and visioning for individual design codes, and master planning, this is likely to be appropriate for developer proposals and where community groups wish to undertake coding (within neighbourhood plans for example), however the Council's Design Code SPD establishes a framework and methodology for applicants to use for their</p>

<p>Additionally, the NMDC outlines that design codes should go through a ‘scoping stage’ which should include the development of a consultation strategy to determine what is popular locally based on evidence from engagement and consultation. This stage should have been undertaken prior to the issue of the current draft Design Code and should have included discussions with developers and communities as to what the code will cover. The NMDC also states that the design visioning process should be an important focus for consultation which should involve communities and stakeholders in the analysis of existing character and how this may change. This step could establish areas where local communities are open to modern and innovative design changes in local areas.</p> <p>The NMDC outlines that for larger sites it may be necessary to produce a masterplan to establish a new street network and decide which area types apply along with various other parameters. It is considered more appropriate to establish design standards on a site-by-site basis through this process than to strictly apply a county wide design code across all developments.</p> <p>How to use the document – planning requirements Our Client welcomes the confirmation that the draft SPD provides guidance on a wide range of issues and that some may not be applicable to all developments. However, the document goes on to state that ‘larger sites are more likely to impact upon a broader range of design matters and will generally need to demonstrate that they are meeting all requirements.’ There are a wide range of design matters presented throughout the document and it is unlikely that it would be appropriate that all larger development should be required meet all requirements of the document.</p> <p>To strictly apply all elements of the design code would be contradictory with the NPPF statement (referenced within the SPD) that “significant weight should also be given to outstanding or innovative design which promotes high levels of sustainability, or helps to raise the standard of design more generally in an area, so long as the development fits in with the overall form and layout of the surroundings”.</p> <p>There are also elements referenced within the Design Code that could have significant viability impacts on developments, particularly those on the edge of historic towns/ villages where prescriptive requirements such as chimneys</p>	<p>coding work. The Council are consulting on this document in line with regulatory requirements and best practice.</p> <p>With regards to text in relation to ‘larger sites...’, this section of the document has been amended to clarify that this relates to the national ‘good design’ principles for on page 6 and within the National Design Guide.</p> <p>The SPD aims to guide developers in ensuring proposals are well-designed and suited to context. It is a guidance document and it is not intended to be overly-prescriptive as that would be difficult to achieve in County Durham given the variety of settlements and the scale of the area. Nevertheless, it is intended that the SPD sets down a clear process to designing places that respond to setting in an appropriate way, which is achieved by way of understanding the setting. The code section is intended to assist with this. However, changes have been made to the presentation of the SPD to aid clarity and help developers use it effectively.</p> <p>Supplementary Planning Documents will be applied to relevant planning applications as soon as they are adopted. Where design work is at the outline stage, there are still opportunities to incorporate the requirements set down within the Design Code SPD and consideration will therefore be given to these requirements.</p> <p>With regards to design review the SPD has been amended and a diagram added to page 4 to clarify how the SPD works alongside this process.</p> <p>With regards to the list of settlements on page 12, this has been checked and amended to ensure a complete list of settlements.</p> <p>The SPD provides a framework and methodology for groups to utilise in order to prepare their own design codes where relevant (i.e. typically for larger, more complex developments). The SPD relates to the whole County, so particular emphasis on any one settlement is not justified given this approach, however it provides examples based upon distinct settlement types. Further, more detailed guidance is available, for example Settlement Character Studies and Conservation Appraisals and Management Plans, which will help to provide additional information and context for individual settlements (such as Durham City, etc.).</p>
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<p>could impact on viability where there could be no strong prevailing local character including these features or they are simply functionally unnecessary. There should be recognition that requirements such as these should be reviewed on a site-by-site basis to establish whether they would be appropriate.</p> <p>The difficulties involved in strictly applying the requirements of the SPD across all larger new developments are raised throughout this representation and it is recommended that this section of the SPD is amended to recognise that it will not always be possible or appropriate for some developments to meet all the requirements of the design code.</p> <p>We would also like to request clarity on the Council's position on determining reserved matters applications in respect of outline permissions determined prior to the adoption of the SPD. It seems unreasonable that such prescriptive requirements within the Design Code would be imposed on developments that were granted permission prior to its adoption.</p> <p>It is also unclear as to how the role of the Design Review Panel may change or how scoring will be impacted through the adoption of the SPD. The Design Code should confirm that the DRP review will be a material consideration in the determination of applications but should not direct refusal of an application as there are other material considerations that could outweigh this feedback. It should also be confirmed that a red score in the DRP does not automatically lead to the refusal of a planning application and again, should be considered on a site-by-site basis. It would be unreasonable to refuse an application with a red score for failing to meet one element of the Design Code when there are other factors at play. Our Client is committed to ensuring a high standard across all their development sites and the subjective nature of the DRP process should not automatically lead to a refusal of an application.</p> <p><b>Settlement Categories</b></p> <p>Whilst it is recognised that the SPD aims to categorise settlements across the County, there are some notable absences from the list. It would not be possible to list every settlement within the County and if the Council are wishing to exclude a settlement from the requirements of the Design Code, then it should be made clear.</p>	<p>With regards to detailed comments relating to the code, including in relation to car parking, the text has been amended to provide a greater degree of flexibility, however the model code provides a starting point and methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to detailed comments relating to the code, including in relation to historic villages (for example in terms of chimneys, dormers, etc.), the model code does not seek to stipulate 'blanket' approaches. Instead it provides a starting point and methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to estate villages, the code provides a starting point for development within these sensitive locations. It is noted that these villages are not generally suitable locations for larger development proposals, and therefore guidance is tailored appropriately.</p> <p>With regards to guidance for early industrial villages, the model coding identifies distinctive features typical in these settlements. The model code provides a methodology for developers to help inform their development proposal which will depend upon the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to 19<sup>th</sup> century industrial towns the code has factored in the variety of character typically found within these settlements. The code provides a starting point and methodology for developers to prepare their own codes in accordance with guidance in the SPD, however this does not appear to have been made clear in the document and therefore amendments have been made to the introduction to provide clarification on this matter.</p> <p>With regards to 19th century mining villages the code has factored in the variety of character typically found within these settlements. The code provides a starting point and methodology for developers to prepare their</p>
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<p>Each of the settlement categories are briefly discussed below, due to the complexity of the document this does not cover all elements of each category but provides an overview of the key concerns within the current draft.</p> <p>Historic Towns and Cities</p> <p>Our Client recognises the importance of setting high design standards within the historic core of historic towns and cities, however, to provide a single design code that guides design across all of these settlements does not reflect the differences evident across them. In this respect, there are elements of guidance that, for example, although appropriate in Durham City, may not be appropriate in Chester-le-Street.</p> <p>An example of this is within the parking checklist for settlement edge sites. These require in plot parking to the front and side of dwellings to be positioned adjacent to areas of private landscape spaces and screened with eye level hedges. The details and materials checklist for settlement edge sites states that ‘materials should respond directly to the dominant palette of the wider context’. These are not a requirement that will be appropriate on all edge of settlement sites and flexibility should be applied to this element of the guidance.</p> <p>The Design Code also requires all settlement edge developments to create blocks of back-to-back plots of outward-facing development and long private rear gardens. It is not considered appropriate to strictly apply this characteristic of development across the settlement edges of all historic towns and cities.</p> <p>Historic Villages</p> <p>Whilst our Client recognises the importance of setting high design standards within historic villages, the SPD should include recognition that not all areas of historic villages share the characteristics of the core of the village and it would not be appropriate to apply a ‘blanket’ approach especially in larger historic villages where characteristics vary across the settlement.</p> <p>The design code for Historic Villages set out within the document contains prescriptive points for developments in these areas which may not be</p>	<p>own codes in accordance with guidance in the SPD, however this does not appear to have been made clear in the document and therefore amendments have been made to the introduction to provide clarification on this matter. For example, the introduction to the model codes stipulates that whilst the SPD provides guidance on a wide range of issues, some may not be appropriate to all developments.</p> <p>With regards to guidance for New Towns, the model coding identifies distinctive features typical in these settlements. The model code provides a methodology for developers to help inform their development proposal which will depend upon the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p>
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	<p>appropriate within all villages, such as limiting building heights to one and two storeys, requiring generous front gardens, inclusion of pitched roof and chimneys, and restricting the use of dormers.</p> <p>These design requirements would have significant viability impacts on developments within these villages which are dispersed across the County across the Viability Areas identified within the Local Plan. The Design Code should be clear that these elements will only be requested where appropriate due to the prevailing characteristics of the area.</p> <p>Estate Villages</p> <p>The Design Code for Estate Villages provides a single set of criteria to be met by all developments across these villages. Whilst these criteria appear to be more flexible than those set out for Historic Towns, Cities and Villages it is not considered appropriate to define a single set of criteria to cover all Estate Villages. Specific Design Codes for larger developments in these areas would be a more appropriate way to guide design in these areas.</p> <p>Early Industrial Villages</p> <p>The Design Code for Early Industrial Villages identifies a range of specific criteria to be met within design codes for these types of villages including:</p> <ul style="list-style-type: none"><li>• openings should be deeply recessed and have a head and sill treatment as appropriate to the sites surroundings</li><li>• variation to fenestration but generally vertically balanced placement with traditional proportion adopted</li></ul> <p>Again, it is not considered appropriate to enforces these specific criteria across all early industrial villages and specific design codes for larger developments would me a more appropriate way to guide design in these areas.</p> <p>19th Century Industrial Towns</p> <p>This section of the Design Code appears to provide more flexibility in the design requirements for these towns which is welcomed. We would welcome further input into the more detailed design codes for these towns at the appropriate time.</p> <p>19th Century Mining Villages</p>	
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	<p>The General Principles Checklist within this section of the Design Code requires the use of materials prevalent in the local vernacular and new development to incorporate a simple material palette. The enforcement of these specific criteria would not allow for innovative designs to be utilised in these areas. Flexibility in these criteria should be clear within the document to allow for creative and innovative design solutions, particularly where sustainability requirements indicate use of certain materials.</p> <p>New Towns</p> <p>Again, a single set of design criteria has been set out to be met by all development across New Towns. Whilst these criteria are again more flexible than those set out for other settlement categories it is not considered appropriate to define a single set of criteria to across all New Towns. Specific Design Codes for larger developments in these areas would be a more appropriate way to guide design in these areas.</p>	
<p>Taylor Wimpey (Emma Hepplewhite - 1304814) Lichfields</p>	<p>Compliance with the National Model Design Code</p> <p>In general the Design Code document includes a lot of written prescriptive elements stating specific requirements. This is at odds with the principles outlined within the National Model Design Code (NMDC) which states that “design codes can provide a more specific steer on what is acceptable when they are visual and numerical rather than relying on detailed policy wording, as well as being easier to engage with”.</p> <p>The NMDC also provides Local Authorities with flexibility to determine the level of detail required within the design codes to be determined locally. This confirms that there is no national requirement for a Design Code to be very prescriptive on all elements of design, as per the current draft. This approach limits the scope for innovative or modern designs to be provided within new developments.</p> <p>Additionally, the NMDC outlines that design codes should go through a ‘scoping stage’ which should include the development of a consultation strategy to determine what is popular locally based on evidence from engagement and consultation. This stage should have been undertaken prior to the issue of the current draft Design Code and should have included discussions with developers and communities as to what the code will cover.</p>	<p>The SPD aims to guide developers in ensuring proposals are well-designed and suited to context. It is a guidance document and it is not intended to be overly-prescriptive as that would be difficult to achieve in County Durham given the variety of settlements and the scale of the area. Nevertheless it is intended that the SPD sets down a clear process to designing places that respond to setting in an appropriate way, which is achieved by way of understanding the setting. The ‘code’ section is intended to assist with this. However changes have been made to the presentation of the SPD to aid clarity and help developers use it effectively. A balance has been struck to ensure a typical range of examples are included, and the approach and methodology set down in the SPD are applicable to all types and locations for development.</p> <p>With regards to a scoping stage and visioning for individual design codes, and master planning, this is likely to be appropriate for developer proposals and where community groups wish to undertake coding (within neighbourhood plans for example), however the Council’s Design Code SPD establishes a framework and methodology for applicants to use for their coding work. The Council are consulting on this document in line with regulatory requirements and best practice.</p>



	<p>The NMDC also states that the design visioning process should be an important focus for consultation which should involve communities and stakeholders in the analysis of existing character and how this may change. This step could establish areas where local communities are open to modern and innovative design changes in local areas.</p> <p>The NMDC outlines that for larger sites it may be necessary to produce a masterplan to establish a new street network and decide which area types apply along with various other parameters. It is considered more appropriate to establish design standards on a site-by-site basis through this process than to strictly apply a county wide design code across all developments.</p> <p>How to use the document – planning requirements</p> <p>TW welcome the confirmation that the draft SPD provides guidance on a wide range of issues and that some may not be applicable to all developments. However, the document goes on to state that ‘larger sites are more likely to impact upon a broader range of design matters and will generally need to demonstrate that they are meeting all requirements’. There are a wide range of design matters presented throughout the document and it is unlikely that it would be appropriate that all larger development should be required meet all requirements of the document.</p> <p>To strictly apply all elements of the design code would be at odds with the NPPF statement (referenced within the SPD) that significant weight should also be given to outstanding or innovative design which promotes high levels of sustainability, or helps to raise the standard of design more generally in an area, so long as the development fits in with the overall form and layout of the surroundings”.</p> <p>There are also elements referenced within the Design Code that could have significant viability impacts on developments, particularly those on the edge of historic towns/ villages where prescriptive requirements such as chimneys could impact on viability where there could be no strong prevailing local character including these features or they are simply functionally unnecessary. The implications of fully addressing all requirements of the SPD</p>	<p>With regards to text in relation to ‘larger sites...’, this section of the document has been amended to clarify that this relates to the national ‘good design’ principles for on page 6 and within the National Design Guide.</p> <p>The SPD aims to guide developers in ensuring proposals are well-designed and suited to context. It is a guidance document and it is not intended to be overly-prescriptive as that would be difficult to achieve in County Durham given the variety of settlements and the scale of the area. Nevertheless, it is intended that the SPD sets down a clear process to designing places that respond to setting in an appropriate way, which is achieved by way of understanding the setting. The code section is intended to assist with this. However, changes have been made to the presentation of the SPD to aid clarity and help developers use it effectively. The council take a pro-active approach to working with applicants including helping to guide the design process. It is considered that there are clear design standards, which are not particularly subjective, which should be factored in from the outset when planning a development and needn’t impact upon viability if applied judiciously and from the outset.</p> <p>Supplementary Planning Documents will be applied to relevant planning applications as soon as they are adopted. Where design work is at the outline stage, there are still opportunities to incorporate the requirements set down within the Design Code SPD and consideration will therefore be given to these requirements.</p> <p>With regards to engagement with communities, this is a core planning principle, emphasised in national policy and design guidance and SPD reflects this requirement.</p> <p>With regards to design review the SPD has been amended and a diagram added to page 4 to clarify how the SPD works alongside this process.</p> <p>With regards to the list of settlements on page 12, this has been checked and amended to ensure a complete list of settlements.</p> <p>The Council’s Design Code SPD is supported by a substantial evidence base relating to character, landscape and development morphology. With regards to Settlement Character Studies these will augment the Design Code and</p>
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	<p>which could have impacts on build costs and densities should be fully assessed within the Development Viability, Affordable Housing and Financial Contributions SPD which is also currently out to consultation.</p> <p>Clarity should be provided as to how Reserved Matters applications will be determined in respect of outline planning applications determined prior to the adoption of the SPD. Although, TW are committed to providing a high standard of design across all developments, the prescriptive nature of the Design Code will not always be appropriate to apply to developments where planning permission was granted prior to the adoption of the SPD.</p> <p>The difficulties involved in strictly applying the requirements of the SPD across all larger new developments are raised throughout this representation and it is recommended that this section of the SPD is amended to recognise that it will not always be possible or appropriate for some developments to meet all the requirements of the design code.</p> <p>The SPD states that “All guides and codes should be based on effective community engagement and reflect local aspirations for the development of their area...” TW agree that where possible design codes should be based on effective community engagement, however, the SPD should also recognise that this may not be possible or appropriate in all cases. This could either be due to the scale of a development or community apathy.</p> <p>The role of the Design Review Panel (DRP) should also be clarified within the Design Code along with the level of weight that will be given to DRP scoring in the determination of planning applications. This should confirm that the DRP review will be a material consideration in the determination of applications, but should not direct refusal of an application as there are other material considerations that could outweigh this feedback. It should also be confirmed that a red score in the DRP does not automatically lead to the refusal of a planning application. Again, TW are committed to providing a high standard of design across all developments, however, the subjective nature of these issues means that DRP scoring should not automatically direct the refusal of an application.</p> <p>Settlement Categories</p>	<p>provide an extra layer of detail, however they are not an essential element to the Design Code as the approach and methodology to site and context analysis is set down in the SPD itself. The project to prepare Settlement Character Studies will likely be a long-running programme given the scale of the County and is not something that will delay preparation of the SPD.</p> <p>The SPD provides a framework and methodology for groups to utilise in order to prepare their own design codes where relevant (i.e. typically for larger, more complex developments). The SPD relates to the whole County, so particular emphasis on any one settlement is not justified given this approach, however it provides examples based upon distinct settlement types. Further, more detailed guidance is available, for example Settlement Character Studies and Conservation Appraisals and Management Plans, which will help to provide additional information and context for individual settlements (such as Durham City, etc.).</p> <p>With regards to detailed comments relating to the code, including in relation to car parking and number of storeys, the text has been amended to provide a greater degree of flexibility. In other areas the guidance remains as for the first draft to properly reflect key characteristics. It is noted that the model code provides a starting point and methodology for developers and is not intended to set overly rigid requirements, as stated in the document.</p> <p>With regards to detailed comments relating to the code, including in relation to historic villages (for example in terms number of storeys, chimneys and dormers, etc.), the model code does not seek to stipulate ‘blanket’ approaches. Instead it provides a starting point and methodology for developers, to be augmented by a range of additional information that will inform the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to estate villages, the code provides a starting point for development within these sensitive locations. It is noted that these villages are not generally suitable locations for larger development proposals, and therefore guidance is tailored appropriately.</p> <p>With regards to guidance for early industrial villages, the model coding identifies distinctive features typical in these settlements. The model code</p>
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	<p>TW recognise the aims to categorise settlements across the County, however, there are some notable absences from the list presented within this section of the SPD. These include: Pelton, Great Lumley and Cornforth. The SPD should recognise that not all settlements are included within this list and if a settlement is excluded it should be confirmed that there is no specific design code.</p> <p>We would also expect Settlement Character Studies to be prepared prior to preparing this Design Code to present appropriate evidence as to how the code should be applied to each settlement. To categorise settlements as per this document without evidence as to why these should be subject to prescriptive design requirements could introduce unnecessary and inappropriate standards to specific settlements.</p> <p>Each of the settlement categories are briefly discussed below, due to the complexity of the document this does not cover all elements of each category, but provides an overview of the key concerns within the current draft.</p> <p><b>Historic Towns and Cities</b>  TW recognise the importance of setting high design standards within the historic core of historic towns and cities, however, to provide a single design code that guides design across all of these settlements does not reflect the differences evident across them. In this respect, there are elements of guidance that, for example, although appropriate in Durham City, may not be appropriate in Chester-le-Street.</p> <p>An example of this is within the parking checklist for settlement edge sites. These require on plot parking to the front and side of dwellings to be positioned adjacent to areas of private landscape spaces and screened with eye level hedges. The details and materials checklist for settlement edge sites states that ‘materials should respond directly to the dominant palette of the wider context’. These are not a requirement that will be appropriate on all edge of settlement sites and flexibility should be applied to this element of the guidance.</p>	<p>provides a methodology for developers to help inform their development proposal which will depend upon the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p> <p>With regards to 19th century industrial towns the code has factored in the variety of character typically found within these settlements. The code provides a starting point and methodology for developers to prepare their own codes in accordance with guidance in the SPD, however this does not appear to have been made clear in the document and therefore amendments have been made to the introduction to provide clarification on this matter.</p> <p>With regards to 19th century mining villages the code has factored in the variety of character typically found within these settlements. The code provides a starting point and methodology for developers to prepare their own codes in accordance with guidance in the SPD, however this does not appear to have been made clear in the document and therefore amendments have been made to the introduction to provide clarification on this matter. For example, the introduction to the model codes stipulates that whilst the SPD provides guidance on a wide range of issues, some may not be appropriate to all developments.</p> <p>With regards to guidance for New Towns, the model coding identifies distinctive features typical in these settlements. The model code provides a methodology for developers to help inform their development proposal which will depend upon the specifics of a proposal and allow for a range of design responses as stipulated in the introduction sections.</p>
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	<p>Strict adherence to the provision of only 1 and 2 storey dwellings would also not allow for sufficient variation to create difference character areas in large developments or a sense of place.</p> <p>The Design Code also requires all settlement edge developments to create blocks of back-to-back plots of outward-facing development and long private rear gardens. It is not considered appropriate to strictly apply this characteristic of development across the settlement edges of all historic towns and cities. The introduction of setbacks in these cities could also referenced to create variety in character.</p> <p>Historic Villages</p> <p>Again, TW recognise the importance of setting high design standards within historic villages, however, the SPD should include recognition that not all areas of historic villages, particularly larger villages such as Lanchester and Wolsingham share the characteristics of the core of the village.</p> <p>The design code for Historic Villages set out within the document contains prescriptive points for developments in these areas which may not be appropriate within all villages, these include:</p> <ul style="list-style-type: none"><li>• Development to be predominantly 1 and 2 storey</li><li>• Generous front gardens</li><li>• Inclusion of pitched roofs and chimneys</li><li>• Restricting the use of dormers</li></ul> <p>These design requirements would have significant viability impacts on developments within these villages which are dispersed across the County across the Viability Areas identified within the Local Plan. The Design Code should be clear that these elements will only be requested where appropriate due to the prevailing characteristics of the area. The allowance of flexibility in height and materials is also required to allow for the use of a sympathetic contemporary architectural style.</p> <p>Estate Villages</p> <p>The Design Code for Estate Villages provides a single set of criteria to be met by all developments across these villages. Whilst these criteria appear to be more flexible than those set out for Historic Towns, Cities and Villages it is not considered appropriate to define a single set of criteria to cover all</p>	
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<p>Estate Villages. Specific Design Codes for larger developments in these areas would be a more appropriate way to guide design in these areas.</p> <p>Early Industrial Villages</p> <p>The Design Code for Early Industrial Villages identifies a range of specific criteria to be met within design codes for these types of villages including:</p> <ul style="list-style-type: none"><li>• openings should be deeply recessed and have a head and sill treatment as appropriate to the sites surroundings</li><li>• variation to fenestration but generally vertically balanced placement with traditional proportion adopted</li></ul> <p>Again, it is not considered appropriate to enforces these specific criteria across all early industrial villages and specific design codes for larger developments would me a more appropriate way to guide design in these areas.</p> <p>19th Century Industrial Towns</p> <p>This section of the Design Code appears to provide more flexibility in the design requirements for these towns which is welcomed. We would welcome further input into the more detailed design codes for these towns at the appropriate time.</p> <p>19th Century Mining Villages</p> <p>The General Principles Checklist within this section of the Design Code requires the use of materials prevalent in the local vernacular and new development to incorporate a simple material palette. The enforcement of these specific criteria would not allow for innovative designs to be utilised in these areas. Flexibility in these criteria should be clear within the document to allow for creative and innovative design solutions, particularly where sustainability requirements indicate use of certain materials.</p> <p>New Towns</p> <p>Again, a single set of design criteria has been set out to be met by all development across New Towns. Whilst these criteria are again more flexible that those set out for other settlement categories it is not considered appropriate to define a single set of criteria to across all New Towns. Specific Design Codes for larger developments in these areas would be a more appropriate way to guide design in these areas.</p>	
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<p>Avant Homes (James Johnson – 1256142)</p>	<p>1.2 Origin Planning Services have been instructed to make representations to the County Durham Design Code Supplementary Planning Document (SPD) Draft 2023 on behalf of Avant Homes North East (AHNE). AHNE is a key investor, employer and provider of new family homes in County Durham, including affordable homes and associated infrastructure. AHNE has recently completed and progressed developments across the County, including at Chester-Le-Street (Vanbrugh Gate), Chilton (Peerfields), and West Rainton (Allenson View), and is committed to ambitious growth plans to invest further in the County. These growth ambitions are firmly grounded on having as much certainty as possible, including with the planning system in terms of what is likely to be acceptable in respect of design.</p> <p>1.2 AHNE recognises the importance of the design of new homes and developments and is on a mission to become the housebuilder of choice in the North and County Durham by making aspirational homes attainable. Overall, AHNE supports the principle aims of the SPD to inspire and guide the delivery of high quality places to live in the County, providing that AHNE's response in section 2 is reflected and addressed in the final SPD. AHNE is committed in this respect to working together with the County Council and other stakeholders to help find the SPD to be 'sound' and acceptable for adoption in respect of being positively prepared, justified, effective and consistent with national policy.</p> <p>1.3 To AHNE, it is crucial that the SPD functions as a design tool kit and should be used a guide rather than something which should be required to be explicitly met in all circumstances. It is important that it is balanced with other planning considerations and should not place unnecessary or unjustified burdens on applicants at a time when Building Regulation requirements and build costs have risen significantly, other planning requirements have been mandated (nutrient neutrality mitigation, delivery of Biodiversity Net Gain (BNG), etc) and when there is housing market uncertainty.</p> <p>Response to the County Durham Design Guide SPD Draft 2023</p> <p>2.1 Overall, AHNE supports the aims and objectives of the County Durham Design Code SPD Draft 2023, however, our key recommendation would be</p>	<p>Comments noted in relation to AHNE's current building activity in the County and overall support for the aims of the Design Code SPD.</p> <p>With regards to concerns that the Design Code SPD might "restrict development coming forward", the approach set down in the document is in place to support developers to create deter quality schemes. The SPD will augment services that are already provided by the council, such as design review, to seek better standards of development. The SPD is not intended to be overly prescriptive - it is a flexible tool to providing a starting point for developers including for the preparation of design codes where these are of use.</p> <p>With regards to existing character and whether it is a suitable guide for new development, the SPD states that this will depend upon the individual circumstances of the proposal. The council take a pro-active approach to working with applicants including helping to guide the design process, however this is a collaborative process and the applicant should demonstrate good design in accordance with national and local requirements. The SPD establishes a clear and consistent methodology to assist with this process, alongside a range of further documentation and services, such as the design review and enhanced design review, which the council provide. Nevertheless, the draft document has been amended to ensure clearer guidance including in relation to applying the document and how it works alongside other design processes and guidance.</p> <p>With regards to text in relation to 'larger sites...', this section of the document has been amended to clarify that this relates to the national 'good design' principles for on page 6 and within the National Design Guide. While the SPD is a starting point for developers, proposals should target best practice in accordance with local and national guidance.</p> <p>The SPD is an aspirational document which sets down best practice guidance, as well identifying how development should respond to context in accordance with local and national guidance. The document provides model codes which identify some of the key characteristics in typical settlement typologies throughout the County for developers to use as a starting point and methodology to design schemes that are better suited to context and</p>

<p>that the Design Code should form a point of reference and should not restrict development from coming forward that would be otherwise be supported by the Local Plan and National Policies. It is important that the SPD functions as a design reference/tool kit and is not more onerous in terms of a rigid application of overly prescriptive requirements. AHNE also has concerns that sufficient Council resource and commitment is in place in terms of supporting these design aspirations both at the pre-application and post submission of applications. Whilst the Council has an established Design Review process it is only able to deal with a relatively small number of sites and proposals at each meeting. It is important that as part of the implementation of further design guidance, noting that the Council already has a Building for Life SPD (adopted 2019), that this does not cause further burdens to the Design Review process and does not delay prospective new developments coming forward in a timely manner. It would also be appreciated if the Council would consider allowing greater transparency in its Design Review process by allowing applicants to attend meetings to understand discussions about their proposals. It is considered that if more design guidance is to be applied it would help applicants more to understand how the Council has discussed proposals and reached the formal feedback responses.</p> <p>2.2 The draft Design Code is structured in four sections: the first two sections cover local and national design policy, context and distinctiveness; with section three categorising the majority of settlements in County Durham into ‘typologies’; and, section four then briefly covers ‘How does the code work’ and sets out design codes with checklists for plan-form, building form/height, detailing/materials, boundary treatments, parking, landscaping and open space. AHNE responds as follow to these respective sections and content of the draft SPD.</p> <p>SPD Sections 1 and 2</p> <p>2.3 The Introduction to the SPD describes how the SPD is intended to form a design toolkit. The Design Code SPD pulls these key evidence bases together to form a design toolkit to help developers create well-designed places that are suited to their context and setting, and ensure new developments reflect a meaningful understanding and evaluation of place, providing additional local guidance should be utilised, for example in relation to heritage,</p>	<p>ensure good design standards in a general sense. It is a guide and does seek to emplace additional burdens on development proposals.</p> <p>With regards to detailed matters in the model code, including in relation to fenestration and boundary treatments it is recognised that there may need to be compromises including in terms of security measures, however good design standards can often still be achieved through a collaborative approach. Page 21 clarifies that whilst the SPD provides guidance on a wide range of issues, some may not be appropriate to all developments i.e. the intention is not to apply the guidance in an overtly literal or prescriptive way, rather it provides an evidence base and methodology for ensuring best-practice designs.</p> <p>With regards to the photos used in the document, they are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p>
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transport and sustainability, to help to ensure major development proposals respond to local requirements. The document seeks to provide a “useful reference” for developments of all shapes and sizes.

2.4 To AHNE, it is a particularly important that the Design Code SPD functions as a design reference/tool kit Guide and nothing more onerous in terms of a rigid application of overly prescriptive requirements. It is imperative that it provides sufficient flexibility to not only enable innovative design but to provide sufficient scope for applicants to reflect the characteristics of individual sites and their location as well as technical and viability issues, and ultimately the delivery of affordable homes, ecological and environmental gain and associated infrastructure.

2.5 Paragraph 132 of the NPPF states ‘Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interest’.

2.6 In view of this and the above, the SPD needs to make it clear that the specific requirements set out to be delivered through the Design Code are indicative as a ‘toolkit’ that will be refined through the development management process and will be defined in more detail in scale and kind in the context of individual applications having regard to the characteristics of the site and its location as well as viability issues.

Sections 3 and 4

2.7 Page 22 sets out some brief points about how to use the prospective Design Code. It delineates between large and small scale developments and what they are expect to deliver in respect of the Code. It is stated on page 22 that:

“Larger sites, on the other hand, are more likely to impact upon a broader range of design matters and will generally need to demonstrate that they are meeting all requirements... Our Design Code will help developers to demonstrate how their scheme accords with the ten key characteristics and in particular how it ensures an appropriate response to context, identity,



built form and spaces... Given the clear mandate for good design set down in planning policy, applicants will need to demonstrate how they achieve this in their planning proposal” [our emphasis added]

2.8 Given the variable nature of sites and locations across County Durham it is important that the SPD is fully justified by being used as a guide rather than something which should be explicitly met. Appropriate wording should be included to this effect to provide sufficient scope for applicants to reflect the characteristics of the site and its location as well as viability issues. A flexible approach to applying the Design Code will enable innovation in larger developments and it is important that the Council does not place blanket onerous requirements upon every development, for example suggesting that all ten of the design objectives of the Code must be specifically met in respect of ‘key characteristics’ in equal measure. Moreover, it is essential to ensure that the Design Code does not simply replicate the already clearly made requirements set out in the National Design Guide and NPPF Chapter 12 - Achieving Well Design Places.

2.9 In respect of implementing the Code, AHNE seeks re-assurance via specific wording in the SPD that sufficient Council resource and commitment will be put in place to ensure the quality and speed of pre-application and post application submission dialogue and response on all new large developments, across all requisite Council departments and third party consultees, with specific timescale for pre-application responses to be received to enable effective dialogue on scheme regarding the Design Code and ensure a lack of Council resource and commitment does not delay prospective new developments. This is particularly important in respect of the application of the Code through the Council’s Internal Design Review process which we understand is often oversubscribed with proposals meaning design feedback from the Council is often delayed

2.10 The bulk of AHNE’s current development sites are in 19th Century Mining Villages, as classified in the Code. AHNE is looking at the development potential of new sites which are located in a variety of settlements including those categorised as Historic Villages and 19th Century Industrial Towns

2.11 In respect of the 19th Century Mining Villages classification in the Code, AHNE notes some inconsistencies and questionable expectations in the design checklists, relative to the market desirability, socio-economic challenges and regeneration benefits in respect of providing new family homes in these types of settlement. For instance, it is stated that developments should be designed to “sensitively integrate with the existing grain and character”; that building lines, and/or arrangement should respond directly to, or inspired by, the positive established pattern; and that plot size, shape, depth, and density, be appropriate to conform to local pattern. Moreover, “a high standard contemporary approach” and “high standards of sustainable technologies” are listed as requirements in the draft checklist at a time when Building Regulation requirements and build costs have risen significantly, other planning requirements have been mandated (nutrient neutrality mitigation, delivery of Biodiversity Net Gain (BNG), etc) and when there is housing market uncertainty.

2.12 Whilst it is laudable that the Council wishes to apply design principles throughout the County it is not fully justified to place unnecessary or unjustified design burdens on applicants, in locations such as former mining villages where values and revenues are relatively low compared to more affluent and desirable parts of the County. New family housing schemes with lower densities in traditional higher density terraced housing areas have proven regenerative benefits for mining villages which have faced socio-economic challenges. Specific wording should therefore be provided to ensure that these checklist requirements are to be used as a guide rather than something which should be explicitly met. Anything other could serve to reduce the viability of such much needed schemes in former mining villages.

2.13 It also noted that there is an inconsistency between requiring “front gardens with low boundary treatments” versus “local fenestration proportions which are varied but with a vertical emphasis”, i.e. high boundary treatments. To meet secured by design standards, higher and more varied boundary treatments are often requested by ‘designing out crime’ consultees. Again, this emphasises the subjectivity of design checklists and reinforces the need for flexibility via specific wording to be provided to ensure that these checklist requirements are to be used as a guide rather than something which should be explicitly met. This is the only way that the

SPD can be fully justified and effective in providing the necessary flexibility but also certainty for applicants such as AHNE in terms of what is likely to be acceptable in respect of design. Failure to do this could result in fewer much needed new developments in 19th Century Mining Villages.

2.14 In addition, further elaboration is needed upon what is meant by ensuring “Materials are locally sourced and laying patterns reflect local design characteristics... Contemporary architecture utilises contextually appropriate materials”. Once again, this reinforces the need for specific wording to be provided to ensure that these checklist requirements are to be used as a guide rather than something which should be explicitly met. Given the variable nature of build costs in relation to different sites and locations across County Durham and Historic Villages, it is important that the SPD is not overly prescriptive and provides sufficient flexibility for applicants to reflect the characteristics of the site and its location as well as local and site-specific viability issues. Whilst it is acknowledged that sourcing materials locally is desirable there needs to be a recognition that due to build cost pressures that there has to be commercial flexibility for developers in selecting its material providers.

2.15 In respect of the Code checklist for 19th Century Industrial Towns, it is noted that there is an aspiration in the SPD for reflecting the current ‘clear hierarchy of scale’ and ‘uniform built forms’ and that development should follow historic street grid patterns, creating “blocks of back-to-back plots of outward-facing development and long private rear gardens” and introducing “animated gables at prominent junction points”. This is subjective and if applied rigidly could cause greater harm than good in respect of high quality design. Once again, this reinforces the need for specific wording to be provided to ensure that these checklist requirements are to be used flexibly as a guide rather than something which should be strictly complied with. Further elaboration is also required via specific wording and illustrative examples to demonstrate what is meant by “contemporary interpretations of local detailing should be utilised, avoiding the use of standard house type designs or ‘anywhere’ architecture”. It is important that the Council acknowledges that there may be circumstances where standard house types are acceptable and that there is not a need to vary standard house types in all developments.

	<p>2.16 As a general point, it is noted that various examples have been extracted from multiple locations in the UK, which often have varying market values and build costs when compared with some of the settlement classified in the Design Code. These are useful examples visually but are based on assumption of ‘anywhere’ costs at a time when build costs have risen significantly and there are other costs being introduced for developments such as BNG, and there is uncertainty in the housing market. Specific wording is required to reflect the importance of build costs and abnormals varying from local area to local area and site to site. It is not as simply as applying one design visually to another area cart blanche and assuming ‘anywhere’ costs. It is imperative that the SPD provides sufficient flexibility to not only enable innovative design but to provide sufficient scope for applicants to reflect the characteristics of individual sites and their location as well as technical and viability issues and ultimately the delivery of affordable homes, ecological and environmental gain and associated infrastructure.</p> <p>2.17 Examples used in the illustrations in the Design Code are predominantly in significantly higher value areas which help to justify additional viability costs in these locations associated with certain types of design which are more achievable as a result of higher revenues and an increased rate of return on costs. New residential developments of family homes in County Durham in many respects are crucial to the regeneration and sustaining the future vitality and viability of settlements as places to live and work. The Design Code needs to reflect this in its tone and expectations on design requirements.</p> <p>Summary</p> <p>3.1 Origin Planning Services have been instructed to make representations to the County Durham Design Code Supplementary Planning Document (SPD) Draft 2023 on behalf of Avant Homes North East (AHNE).</p> <p>3.2 Overall, AHNE supports the process and principle aims of the SPD to inspire and guide the delivery of high quality places to live in County Durham, providing that AHNE’s response in section 2 is reflected and addressed in the final SPD.</p>	
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	<p>3.3 Specific wording is required to ensure that the SPD is used as a guide rather than requirements which should be explicitly met in order to provide sufficient flexibility for applicants to reflect the characteristics of individual sites and their location as well as technical and viability issues and ultimately the delivery of affordable homes, ecological and environmental gain and associated infrastructure.</p> <p>3.4 Further elaboration is also required via specific wording and illustrative examples to demonstrate what is meant by certain checklist requirements, for example, “contemporary interpretations of local detailing should be utilised, avoiding the use of standard housetype designs or ‘anywhere’ architecture”. There is equally a need for the SPD to resist assuming ‘anywhere’ build costs which do in fact vary from local area and local area and site to site in respect of materials and viability matters.</p> <p>3.5 AHNE is committed in this respect to working together with the County Council and other stakeholders to help find the SPD to be ‘sound’ and acceptable for adoption in respect of being positively prepared, justified, effective and consistent with national policy. Consistent with paragraph 132 of the NPPF, AHNE therefore seeks specific wording in the SPD that sufficient Council resource and commitment will be put in place to ensure the quality and speed of pre-application and post application submission dialogue and response on all new large developments, across all requisite Council departments and third party consultees, to ensure the effective implementation of the SPD.</p> <p>3.6 AHNE reserves the right to fully object to the SPD prior to its adoption and also reserves the right to make further written representations if appropriate amendments are not progressed by the Council.</p>	
Historic England (Henry Cumbers)	<p>We generally welcome the content of the draft Design Code. The Code offers an important opportunity to raise design quality across County Durham through a clear design ambition with parameters. In our area of interest good design standards will help ensure the Council is best placed in conserving and enhancing the historic environment.</p> <p>The draft Design Code is strong on identifying the built character of settlement typologies across the County. We also welcome the intention to</p>	<p>Comments noted and changes have been made to the document to help with accessibility, for example the introduction of the document has been edited to provide clearer instructions for users.</p> <p>With regards to mapping national character areas, due to the size of map and detailed needed to cover the whole County, it would be difficult to achieve accessibility requirements. However, for context a map of the</p>

<p>prepare Settlement Character Studies such as that for Newton Aycliffe as shown in the appendix to the draft.</p> <p>However, at this draft stage we consider that there is the potential to improve the usability of the Code to the general reader who we all want to engage on this issue.</p> <p>The current draft Design Code may be considered somewhat inaccessible particularly for those with less design experience but still with an interest in achieving quality outcomes from new development within County Durham.</p> <p>The draft Design Code is presently text heavy which is somewhat at odds with the spirit of the National Model Design Code that they should be in visual and numerical form wherever possible. There may be an opportunity to reduce the level of text in some parts of the Code, for example on page 23 through a use of images to demonstrate existing character.</p> <p>Detailed comments</p> <p>We make the following comments on the draft Design Code:</p> <ul style="list-style-type: none"><li>• The baseline analysis relies heavily on Natural England’s National Character Area profiles. Whilst recognising these are an important part of the evidence base, we consider a wider range of evidence should be used such as the existing Historic Landscape Characterisation for County Durham, Conservation Area Appraisals, and the Durham World Heritage Site Management Plan etc. Examples of baseline analysis are found at page 9 of the National Model Design Code Part 1 (1B Baseline);</li><li>• A greater use of mapping within the analysis section would help establish a visual portrait and narrative of the County, including built heritage, landscape, local vernacular etc. Mapping of the National Character Area profiles for the County would also be useful.</li><li>• There does not appear to be an overall vision for good design for County Durham in the draft Design Code. Whilst recognising that page 6 offers an understanding of good design at the national level, it would be helpful to expand upon this to establish what this means for County Durham and what sets it apart from other areas;</li><li>• There does not appear to be a Coding Plan identifying the settlements across the County;</li></ul>	<p>County has been added to page 8 of the introduction and links are provided to related documentation which includes further mapping.</p> <p>A Vision has been incorporated into introduction, to help summarise what good design means for County Durham.</p> <p>With regards to settlement characterisation and categorisation, the document is inclusive of the whole County and therefore specific settlements will not be highlighted in greater detail than others.</p> <p>With regards to the photos used in the document, they are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p>
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| <ul style="list-style-type: none"><li>• Some of the characterisation elements in the Code section may be better placed in the baseline analysis in order to simplify the Code itself;</li><li>• We consider the identification of settlement types to be generally appropriate and. However, for considerations such as identity and context including materials there may be a need to place the settlements within broader area types linked more to the landscape and code for these broader areas. The draft Design Code does this partially at present through the National Character Area profiles it is unclear which settlement is in which of these profile areas;</li><li>• In larger settlements such as Bishop Auckland, Consett and Durham, residential areas may be better categorised as different typologies to differentiate between the town centres, 19th century terraced areas and 20th century suburbs as they are of different character from one another but also distinctly different from their centres. Whilst we recognise the draft Code does this presently through setting different code elements for the historic core, later expansion and settlement edge, there is nothing to demonstrate rough boundaries for these areas;</li><li>• Considering the merits of whether Durham should be a separate area type given its wealth of built heritage should be at least analysed as part of the baseline even if the same result is concluded;</li><li>• The maps and general photos of area types are too small to provide clarity, for example on page 14 it is difficult to retain clarity for the mapping when zoomed in;</li><li>• Across the Design Code, increased annotation of photos and sometimes the layout plans would provide a stronger understanding of what is being demonstrated as good design;</li><li>• Where photographic examples are used as good case practice, we consider that there using more examples across County Durham than there is at present, would be helpful in setting out where good practice has been achieved to date;</li><li>• When identifying suitable materials, the matrices would be more useful if they were annotated;</li><li>• There should be an increased focus within the Code on raising design standards within conservation areas;</li><li>• It may be useful to provide more hyperlinks within the Design Code to other sources of evidence or policy (for example on page 4 to Policy 29 of the adopted County Durham Plan).</li></ul> |  |
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	<ul style="list-style-type: none"> <li>• We welcome the intention to undertake Settlement Character studies as set out in the Appendix for Newton Aycliffe but consider that they would be more beneficial to achieving good design at the local level if they had weight of SPD status and provided more specific coding elements for these settlements.</li> </ul>	
Sunderland City Council (1255815)	Sunderland City Council have no comments to make on the SPDs at this point in time.	Comment noted.
(John Ashby – 1303538)	<p>Introduction Pg 3/Policy Context Pg 4/Background Pg 6.</p> <p>The Trust is appreciative of this draft where it aims to fulfil the guidance offered by the National Design Code and its supporting documents. The introduction is appropriate and the policy context and background well explained. Given the lack of other county-wide examples and the early stages of Design Code development at this scale, any first draft is to some extent breaking new ground.</p> <p>The relationship of this SPD to the other SPDs need identifying; a 'road map' would help. As an example, how does it relate to the Parking and Accessibility SPD? The code will need to show how it will relate to the City's Settlement Study and the Durham Conservation Area Management Plan (DCAMP). There will be substantial pressure on the DCAMP to provide sufficient context and detail to adequately guide ensuing detailed design codes and this needs cross referencing.</p> <p>The Policy Context section shows that neighbourhood plans are an influence upon this code. The Durham City Neighbourhood Plan (DCNP) involved substantial research and endeavoured to establish broad principles of design (see Policies H2 and H3). It is essential that this design code demonstrates how it relates to the DCNP and uses it to tie both policy and content into the code. This also may be the case for other neighbourhood plans in the County.</p> <p>In general, there should be reference to the need for community involvement in the Design Code process, particularly for larger developments. There are valuable community resources and these are evident in the neighbourhood plan process and the work of the City of Durham City Parish Council.</p>	<p>Comments are noted and a number of amendments have been made to the document to improve the document. For example, the introduction has been redrafted to confirm how the document is intended to be used and how it fits with other policy documents and process such as with regards to design review and settlement character studies.</p> <p>With regards to community involvement, page 21 of the document specifically notes the benefits of this.</p> <p>In terms of the potential scope of background information for coding, it is agreed that the SPD provides a starting point and it highlights the benefit of a broad evidence base for such purposes. The code sets out a general framework and approach which helps to identify broad typologies and similarities across the County. Given its scale however, the document seeks to strike a balance the level of detail provided by grouping similar settlements however the more detailed guidance will come from the settlement character studies and other evidence base documents. The model codes are a starting point for developers and groups to augment as necessary.</p> <p>With regards to Durham City, a detailed assessment has been undertaken within the background settlement character study work which should be utilised, in addition to the code, to inform development proposals. This will sit alongside a raft of additional guidance, for example the Conservation Area Appraisal and Management Plans.</p> <p>Development with the sensitive environs of Durham City will be subject to the evolution of site specific briefs and detailed contextual assessment, including where applicable detailed HIA and ICOMOS assessments as part of</p>



<p>The National Character Area profile provides a sound basis, particularly where historic settlements relate to their geology through their building materials. However, over-reliance on this basis of geology, landscape character and settlement categories for simplifying coding leads to problems. These analyses are of course extremely useful in the process generally, but do not provide the full background needed for coding.</p> <p>The Design Code is more related to settlements and their adaption to change. As an example, the Tyne and Wear Lowlands section doesn't even mention Durham City, only Peterlee and new towns. There is more that will be needed on how building materials have changed from a geological basis, through imported materials by railway and on to the current universality of supply. This can be incorporated at a high level for further detail as part of the settlement studies. This could be fundamental in aspiring to maintain and enhance settlement distinctiveness. It is a key issue for Durham's new developments.</p> <p>Greater adaption beyond the Character Study is needed for this Design Code. Sustainability in all its aspects needs to be more of a thread through the code. This underpins many of the topics and is a key issue in improving new development in Durham. Biodiversity as a further example, needs also to be more embedded as part of sustainability. Layout is key to solar gain and new developments need to be future-proofed to ease meeting new energy standards. A key factor for the City's historic areas is retrofitting for improved energy performance. This ranges from solar panels to wall insulation; these and others can have a high and sometimes negative impact on conservation areas in particular.</p> <p>The draft SPD moves on to further describe context and distinctiveness leading to settlement categories and then the generation of model design codes for the categories. It is this process and its conclusion that the Trust feels is insufficient to fully aid the production of design codes for developments in Durham City. It understands the complexity of the task and the extensive range of settlements leading to a heavy burden of background research. The result, in the view of the Trust, is a failure to adequately outline Durham City's characteristics even at a high level and to lead to code that will help in steering design codes for its future developments.</p>	<p>a collaborative planning process. Whilst the Design code will assist in the general codification of principles the site specific and development nature requires a far more acute approach to Design development and evolution.</p> <p>With regards to climate considerations and renewables, the focus of the SPD is on establishing design codes and ensuring development that is suited to context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p> <p>With regards to omissions around active travel and a lack of technical detail on densities, plot densities etc. it is agreed that these matters are key to larger scale development schemes, such as strategic expansion and garden villages. However, the focus of the SPD is around setting down a framework and methodology for developers and groups, alongside the national design guide and code, which developers and groups can use to ensure key principles are adhered to. The design review process and site-specific master planning can augment the process and ensure these more detailed considerations are factored into designs.</p>
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The first point where this starts to show is Page 14 where Durham City is grouped with Barnard Castle, Bishop Auckland and Chester-le-Street to merge their characteristics together. This may work in other contexts but not for this SPD. Durham City is significantly different by scale and complexity not to be simplified this way. It simply doesn't fit with the others although there are superficial similarities. Durham is unique - the World Heritage Site (WHS) designation backs this up. Its scale, importance and domination historically push it into a different category of its own. Its function as a county focus for services and later development reinforce this. Even now the clustering of administration functions - the County Council itself, Passport Office and NSI - demonstrate this. Add in the University and its current domination of the city, its inner residential areas and economy and these move it further from the other towns. Later modern suburban development and the current urban extension push it further still.

Durham clearly sits at the centre of transport links historically i.e. the Great North Road and the East Coast Main Line railway - it remains a hub. As a result, the current code shows detail in some areas while missing substantial areas needing greater guidance. The suburban wings of the city clearly need their own sections. The new city centre developments are large enough to demand coding if further development or change ensues. The University areas and Aykley Heads equally need specific emphasis. There is much that is shared in the typology on Pages 23-26. However, for Durham this misses the impact of the WHS in its entirety. It concentrates on the city core and inner city to the exclusion of the rest of Durham with its large suburban 'wings' and extensive new inner city developments.

In its 20th century growth the city has absorbed formerly distinct settlements like Framwellgate Moor and Carrville which would otherwise fall under one of the other typologies, and these should also be recognised in the code. Substantial change close to and within the city centre from the 20thC onwards has profoundly impacted on the city. Continuing adjustment following the collapse as a retail centre is currently consistently moving towards leisure uses, also with substantial impact. These need recognition within the code. Finding a route to distinctiveness within the suburban and inner city expansion areas can be lost where the immediate context is used for guiding the design. It effectively rules out enhancement and results in

examples of recent inappropriate volume house or other building being used to guide new design.

Pages 24 and 25 have relevance but need pushing further for the city. The illustrations are encouraging but not a reflection of where Durham is at the design of new buildings. Outside the historic core the code over-emphasises conforming with the existing development patterns. There is a recognition in the National Design Guide that future designs need to be better than what has gone before. For example, to deliver sustainable transport, 15 minute neighbourhoods, and to meet the demand for accessible and adaptable homes the design of infill development and larger developments will need to depart from current patterns, with gentle densification and a wider variety of built forms.

Para. 8 of the Guidance Notes for Design Codes recommends two steps: (a) an analysis of the existing character of an area and (b) a visioning exercise to work towards a future enhanced vision for each area. It is not clear that such a vision is being articulated. Backland development is discouraged for the historic core but is an issue for other residential and suburban areas as well. Page 26 does not adequately deal with the large city suburban developments - the design of the new expansion areas being a very significant current issue.

Page 27 and its landscape aspirations are well aimed but need a tighter city perspective. However, layout is at the heart of adequate design especially for larger developments. It is in this situation that the lack of any detail on design for Active Travel is most acute. The parking requirements for settlement edge sites will make it hard to achieve viability for public transport and entrench car dependency. The Trust submitted a detailed response to the Parking and Accessibility SPD consultation in 2022 and if our evidence is persuasive there will need to be significant changes in how car parking is planned for edge of settlement developments. Sustainability through layout relationship to solar gain should also be a factor but is conspicuously missing from new developments in Durham. Where appropriate to the Trust's area of interest the various village sections are well judged and helpful ( Pages 28-36 ).

	<p>The Trust would very much like to see developments of the quality illustrated. There should be reference to striving for excellence. The Trust has previously noted examples of good practice in York.</p> <p>The extensions section ( Page 50 ) is very interesting and may provide scope for future better design. The scale of rented accommodation extensions and suburban house enlargement in Durham is a continuing issue. The pressure for these and the brutal reality of economics is very different to the ideal bespoke developments illustrated. Help from this SPD is needed for the City.</p> <p>The Newton Aycliffe settlement character study is a solid and well produced example. For the City it will inevitably be a crucial and more complex piece of work. How this integrates with the work on settings and conservation areas may well prove useful in this.</p> <p>Topics omitted</p> <p>Page 6 introduces the ten key characteristics from the National Design Guide. The proposed County Durham Design Code is largely or entirely silent on a number of these characteristics, in particular:</p> <p>Nature: high quality green open spaces that support play, water management and a rich and varied biodiversity. In view of the declaration of an ecological emergency far more attention should be given to this aspect of design.</p> <p>Public space: creating well-located and attractive public spaces which support social Use: a mix of uses, tenures, types and sizes, supporting social Homes and Buildings: internal/external environment, attention to detail on storage, waste, servicing and utilities.</p> <p>Resources: energy hierarchy, materials and techniques, While materials are mentioned in the proposed code, this is from a visual perspective rather than one of sustainability.</p> <p>Lifespan: well-managed and maintained; adaptable to changing needs and evolving technologies; a sense of ownership.</p> <p>While the National Model Design Code makes it clear that design codes are not expected to cover all of these issues, there is no rationale in the proposed County Durham code for which aspects have been included and which omitted. Para. 27 of the NMDC lists certain topics which should be</p>	
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included as a minimum and para. 28 advises on others which would be expected for codes which cover large scale development.

The National Design Guide and Model Design Code both include three main themes within the Movement characteristic. The Active Travel theme has been omitted from the summary on page 6 and from the proposed code. The only aspect of Movement treated in any detail within the proposed code is car parking, and this is very weak in terms of effecting better design. While the NMDC para. 49 identifies parking as one of two key variables for Movement, that does not mean other design aspects should not be covered. The point is that parking is a variable: the quantities and types of provision will vary by area. It is clear from Figure 2 on page 7 of the NMDC that many other aspects of Movement would be expected in a design code, and would probably fall into the part of the code which would apply to all developments and settlement typologies, as envisaged in section 3.B of the NMDC.

It is noticeable that there is no code-wide guidance in the proposed County Durham Design Code. The recent planning applications for Bent House Lane and Sniperley Park illustrate the car-first approach to layout which will eventuate if this omission is not addressed. The code should cover the macro-level, in terms of the primacy of the walking and cycling network and the layout of that network in relation to amenities, and the micro-level such as junction design, as covered by section M.2.ii of the Guidance Notes for Design Codes.

Para. 4 of the Guidance Notes for Design Codes states that effective design codes rely on visual and numerical information rather than detailed policy wording. The visual aspects are reasonably well covered with the illustrations (though some, like the shared courtyard parking at Thomgate, Barnard Castle, featured on p. 27, are not perfect models to aspire to). There is little numerical information, aside from heights of fences and lengths of gardens. Key parameters such as density, floor area ratios and plot ratios are lacking. Generally the greatest weakness for Durham is in layout and the essential basis needed for development. Finding an adequate response to new house design for the larger new housing areas that responds to the best of Durham needs more work and substantial assistance through pointers in

	<p>this upper tier code. These issues are very conspicuous failings in plans and design guides submitted with major housing submissions.</p> <p>Typographical errors Page 10 refers to 'Magnesium Limestone'. These should be corrected to 'Magnesian Limestone' (as in the illustration on page 9).</p> <p>Conclusion The Trust hopes that the above comments are helpful in achieving the welcome purpose of this Supplementary Planning Document. We look forward to the consultation on the final draft.</p>	
<p>City of Durham Parish Council (Adam Shanley – 1255847)</p>	<p>The City of Durham Parish Council welcomes the County Council's proposed introduction of this new, highly detailed Design Code and appreciates the opportunity to comment on this draft version.</p> <p>At a specially convened meeting of its Planning and Licensing Committee members praised the level of care involved in creating such a detailed and clearly structured 'handbook' and felt that overall, it could be of considerable benefit to all the users listed.</p> <p>The following comments emerged during discussion with members mindful of Durham's City's specific needs and constraints such as the conservation area, WHS and the green belt.</p> <p>Background The County Council rightly highlights that "at an early stage of the design process, the relative priority for different characteristics may be discussed and agreed". The Design Code highlights that the most relevant characteristics are likely to be determined by a number of considerations and goes on to list these. We feel that this needs re-organising so that "the strategic priorities of the local authority" is priority 1 in the list with the rest cascading to the more local.</p> <p>National Character Areas While the description of the local vernacular and building materials certainly puts Durham in the Durham Magnesian Limestone Plateau category, it isn't listed here and members felt it should be specifically named.</p>	<p>Comments noted and in general, proposed development sites identified within the sensitive environs of Durham City will be subject to the evolution of site-specific briefs and detailed contextual assessment including, where applicable, detailed HIA and ICOMOS assessments as part of a collaborative planning process. Whilst the Design code will assist in the general codification of principles the nature of sites within Durham City will require site specific briefs dependent on the development type and location to ensure a far more acute approach to design development and evolution through the planning process.</p> <p>With regards to descriptions of national character areas (page 9) the Durham Magnesian Limestone Plateau category does not mention Durham City and an amendment has therefore been made to rectify this.</p> <p>In relation to conceptions around characterisation and location within a settlement (i.e. core, settlement edge, etc.) this is provided in a general sense to set a methodology for considering differences within the settlement. As stated Durham consists of a number of older, planned suburbs and outlying settlements in their own right however the SPD needs to set a standardised approach across a range of settlements. However, detailed Settlement Character Studies will be prepared which provide this additional layering and detail to better match local context.</p> <p>With regards to climate considerations and renewables, the focus of the SPD is on establishing design codes and ensuring development that is suited to context. It includes reference to national design guidance best practice (see</p>

<p>Settlement Categories</p> <p>Members appreciate the need to have distinct and different settlement areas to reflect the diversity of historic development within the county. However, here the Parish Council has some concerns. The Design Code identifies Gilesgate as a ‘Settlement Edge’ within the larger category of ‘Historic Towns and Villages’ – in this case this is the City of Durham. We would argue that Gilesgate is not just an ‘edge’ but a small neighbourhood / village in its own right. This will also extend to other areas - Belmont, Shincliffe, Newton Hall and Framwellgate Moor for example, are not mentioned at all, yet all have distinct characteristics and populations which should be reflected. The Parish Council would support the introduction of a seventh settlement category – e.g., ‘City Urban Expansions’ or Historic Town Suburbs’ to capture these important communities.</p> <p>For each settlement, there is a need for the Council to actually define/ map exactly where they mean by “Historic Core - infill development, Later Expansion - infill/small development sites and Settlement Edge - medium-large development sites”</p> <p>The Design Code</p> <p>The Design Code rightly highlights that ensuring higher standards of design can also help achieve broader Council ambitions around climate change, environmental growth and nature recovery and goes on to state categorically that the Council recognise that our future living environment will be impacted by and can influence climate change. Thereafter however there is next to no design code item relating specifically to green infrastructure or renewables e.g. what type of solar panels would be acceptable within the Conservation Area, whether green walling will be promoted/acceptable, etc. Members were strongly of the opinion that more detail is needed on the climate change aspect of design not only when considering new development but in securing a sustainable future for the aging fabric of historic buildings.</p> <p>On p24 of the Code relating to Historic Towns and Cities, under the plan-form principles checklist the document states that where – within the historical core - burgage plots are legible, “backland development should be avoided”. Given that this very important feature of Durham City’s historic</p>	<p>page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p> <p>Comment noted. The photos used in the document are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p> <p>With regards to detailed the text on dormers in ‘villages’ this has been amended to state ‘settlements’ as suggested. The suggestion to amend text relating to backland development will remain as it is to ensure flexibility and a proportionate approach.</p>
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	<p>core is under increasing commercial pressure the Parish Council feels it is important to strengthen this further to say unambiguously that this “must be avoided”.</p> <p>Page 50 in relation to extensions and dormers the guide says that, irrespective of typology that dormer/ roof extensions “should only be provided where dormers are an existing characteristic of the village”. Members thought the reference here to ‘village’ confusing and suggest it be amended to something like “settlement”.</p> <p>Overall, the Parish Council very much welcomes the commitments within this document regarding community engagement on both the creation and implementation of the Design Code e.g., “Local communities can play a vital role in achieving well-designed places and buildings and making sure there is a relationship between the built environment and quality of life. Communities can be involved in design processes through approaches such as co-design, design workshops and other engagement techniques, so that places and buildings reflect local community preferences, improve their quality of life and fit well into their surroundings”. The Parish Council very much supports this approach and would like to be an active partner in design workshops for example.</p> <p>Finally, as a general comment, if this document is to be the definitive Design Code for County Durham, members would have preferred at least some of the ‘good practice’ photographs to be of local streets/ buildings in County Durham as opposed to examples from other parts of the UK.</p>	
<p>The Coal Authority (Peter Woodcock - 1299775)</p>	<p>The Coal Authority is a non-departmental public body sponsored by Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records indicate that within the County Durham area there are recorded coal mining features present at surface and shallow depth including; mine entries, shallow coal workings, surface coal mining, fissures or breaklines, reported surface hazards and mine gas sites. These recorded features may pose a potential risk to surface stability and public safety.</p>	<p>Comment noted.</p>



	<p>The Coal Authority's records also indicate that surface coal resource is present in the area, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.</p> <p>It is noted that this current consultation relates to a Supplementary Planning Document for County Durham Design Code. I can confirm that the Planning team at the Coal Authority have no specific comments to make on this consultation document.</p>	
<p>Belmont Parish Council (Mrs S Overton – 1255833)</p>	<p>Belmont &amp; Gilesgate Neighbourhood Plan Partnership was established in February 2022 by Belmont Parish Council and Gilesgate Residents' Association. A working group, comprising representatives from both organisations is progressing the plan and the designated plan area was formally approved by Durham County Council in November 2022.</p> <p>The working group, in addition to the founding bodies, involves up to twenty residents from the plan area. Six indicative themes have been identified namely,</p> <ul style="list-style-type: none"> <li>• Unallocated land for development</li> <li>• Housing</li> <li>• Features and Facilities including green spaces.</li> <li>• Sustainability</li> <li>• Retail and Leisure</li> <li>• University Development.</li> </ul> <p>These are the subject of ongoing consultations with residents.</p> <p>In addition to public meetings attended by upwards of 50 people and a newsletter circulated to all households, the working group meets with</p>	<p>The principles set down in the SPD establish a methodology for developers to follow to ensure development is suited to context and place. The SPD relates to the whole County, so particular emphasis on any one settlement is not justified given this approach. Nevertheless, it is noted that a raft of additional guidance is under preparation for Durham City, for example the Conservation Area Management Plan and Settlement Character Study.</p> <p>With regards to climate considerations, the focus of the SPD is on establishing design codes and ensuring development that is suited to context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p> <p>Comment noted. The photos used in the document are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p>

<p>smaller more focused groups to discuss relevant issues. These have thus far involved the Baptist Church Coffee Morning; Belmont Working Men's Club and Pelaw View Luncheon Club. More are planned for the next few months.</p> <p>The Neighbourhood Plan Partnership on behalf of its founding bodies and following discussion through the working group and with the wider public submits the following observations and recommendations on the four supplementary planning documents.</p> <p>Design Code SPD</p> <p>Generally, we are delighted that the code will ensure well designed development which will fit in with its community and surroundings. We understand that a Design Code is a set of illustrated design requirements that provide specific detailed parameters for the physical development of a site or area.</p> <p>We especially welcome:</p> <p>Connections to and support for, local Neighbourhood Plans. The comments about the development of Neighbourhood Plans and how to integrate a locality-specific design code into the Neighbourhood Plans which we are currently developing.</p> <p>Consultation with the local community and community engagement. The code states that developers will involve communities in co-design and design workshops and work to develop a relationship between the lived environment and quality of life. That developers should consider and respond to the needs of communities within which their developments are located, is crucial for good relationships and local acceptance.</p> <p>Settlement areas. We appreciate the need to have distinct and different settlement areas to reflect the diversity of historic development within the county. However, here we have some concerns. You identify the area which we represent as 'Settlement Edge' within the larger category of 'Historic Towns and Villages' – in our case this is the City of Durham. We believe that we are not just an 'edge' but a small neighbourhood / village in our own right. This will also extend to other areas - Belmont, Gilesgate, Shincliffe,</p>	<p>It is acknowledged that the main focus is on residential development, however the principles and approach set down in the document apply equally to all types of development and this is clearly articulated in the SPD.</p>
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	<p>Newton Hall and Framwellgate Moor for example, are not mentioned at all, yet all have distinct characteristics and populations which should be reflected. We suggest that you need a seventh settlement category – e.g., ‘City Urban Expansions’ or Historic Town Suburbs’ to capture these important communities.</p> <p>We have a small number of concerns:</p> <ol style="list-style-type: none"> <li>1. Durham City is not referenced in the National Character Areas at the start of the design code. As a principal settlement, we feel that it should be referenced.</li> <li>2. There is no design guide relating to aspects of climate change protection, for example technical detail on requirements of solar panels.</li> <li>3. The pictures included in the design guide are not from this area and could give developers unsuitable ideas of designs which would fit in our area. This has potential to be misleading and potentially contradictory to development.</li> <li>4. There is very little reference in the code to commercial and retail design, it mainly focuses on residential. We feel that further work could be included on commercial design in the identified character areas.</li> </ol>	
<p>Durham University (Matthew Wright – 1256180)</p>	<p>The Design Code SPD seeks to establish a framework for ensuring high quality design, in accordance with local and national planning policy and guidance. We understand the SPD is intended to support all types of development, from householder works to large scale housing and commercial proposals, however this does not seem to follow through in the guidance provided.</p> <p>The SPD sets out seven settlement categories, one of which is ‘Historic Towns and Cities’ which Durham City falls within. Historic Towns and Cities then comprises a series of guidance which must be taken on board in any new development proposals, which is categorised as follows;</p> <ul style="list-style-type: none"> <li>• Plan Form</li> <li>• Built Form and Height</li> <li>• Detailing and Materials</li> <li>• Boundary Treatment</li> <li>• Car Parking</li> <li>• Landscaping and Open Space</li> </ul>	<p>It is acknowledged that the main focus of the SPD is on residential development, however the overarching principles and methodology set down in the document apply equally to all types of development and this is clearly articulated in the document. Within a settlement there will be a plethora of character areas. In the case of Durham City, for example, a raft of additional guidance is in place, for example the Conservation Area Appraisal, and under preparation, such as the Conservation Area Management Plan and Settlement Character Study, to assist developers.</p> <p>Proposed development sites identified by the University Estate and other developers within the sensitive environs of Durham City will be subject to the evolution of site specific briefs and detailed contextual assessment, including where applicable detailed HIA and ICOMOS assessments as part of a collaborative planning process. Whilst the Design code will assist in the general codification of principles the site specific and development nature requires a far more acute approach to Design development and evolution.</p> <p>With regards to climate considerations, the focus of the SPD is on establishing design codes and ensuring development that is suited to</p>

<p>Given that the design guidance set out within the SPD generally makes reference to private residential dwellings/plots, Durham University seek clarity from the LPA as to what degree of flexibility will be attributed when applying these design principles to the main parts of the University estate and, more specifically, to proposals for new student accommodation. It is recommended that the LPA make this clearer within the SPD and specify as necessary the requirements for student accommodation/PBSA proposals.</p> <p>Durham University strives to produce high-quality, well-designed buildings, therefore a recognition of and allowance for the University aesthetic and identity should be included within the Design Code. The University estate contains a variety of academic buildings and college accommodation, which all have their own identity and make a substantial contribution to Durham City's plan form and character. Whilst noting that the 'Historic Towns and Cities' section of the draft Design Code SPD within which the University falls within, also refers to Barnard Castle and Chester le Street etc, there should be reference within this section to the differing nature of the University, and recognition and support given to the University's commitment to continuing to produce new development that has its own strong and distinct identity, whilst also making a positive contribution to the heritage of the City of Durham and the OUVs of the World Heritage Site.</p> <p>Further clarity on the other elements such as open space provision or providing a mixed use element, and how these should be interpreted when making additions to larger sites or large developments for specific user groups i.e. students, the elderly, etc. would also be welcomed.</p> <p>The Design Code SPD does not provide any detail on the inclusion of renewable energy and matters to address climate change, such as solar energy and air/ground source heat pumps. Given the climate emergency declared by Durham County Council but noting the sensitivity of the historic Durham City environment, guidance should be provided as to how these technologies can be appropriately integrated into future development.</p> <p>Notably the majority of the examples of 'good design' seem to be from outside of Durham City and County Durham, perhaps some more local examples would be helpful.</p>	<p>context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p> <p>With regards to photos used in the document are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p>
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<p>Gilesgate Residents Association (Richard Hornby – 1300405)</p>	<p>Belmont &amp; Gilesgate Neighbourhood Plan Partnership was established in February 2022 by Belmont Parish Council and Gilesgate Residents' Association. A working group, comprising representatives from both organisations is progressing the plan and the designated plan area was formally approved by Durham County Council in November 2022.</p> <p>The working group, in addition to the founding bodies, involves up to twenty residents from the plan area. Six indicative themes have been identified namely,</p> <ul style="list-style-type: none"> <li>• Unallocated land for development</li> <li>• Housing</li> <li>• Features and Facilities including green spaces.</li> <li>• Sustainability</li> <li>• Retail and Leisure</li> <li>• University Development.</li> </ul> <p>These are the subject of ongoing consultations with residents.</p> <p>In addition to public meetings attended by upwards of 50 people and a newsletter circulated to all households, the working group meets with smaller more focused groups to discuss relevant issues. These have thus far involved the Baptist Church Coffee Morning; Belmont Working Men's Club and Pelaw View Luncheon Club. More are planned for the next few months.</p> <p>The Neighbourhood Plan Partnership on behalf of its founding bodies and following discussion through the working group and with the wider public submits the following observations and recommendations on the four supplementary planning documents.</p> <p>Design Code SPD Generally, we are delighted that the code will ensure well designed development which will fit in with its community and surroundings. We understand that a Design Code is a set of illustrated design requirements that provide specific detailed parameters for the physical development of a site or area.</p>	<p>The principles set down in the SPD establish a methodology for developers to follow to ensure development is suited to context and place. The SPD relates to the whole County, so particular emphasis on any one settlement is not justified given this approach. Nevertheless, it is noted that a raft of additional guidance is under preparation for Durham City, for example the Conservation Area Management Plan and Settlement Character Study.</p> <p>With regards to climate considerations, the focus of the SPD is on establishing design codes and ensuring development that is suited to context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design which includes climate considerations. The County Durham Plan supports these requirements. The document does not however seek to cover technical details as that is beyond the scope of the SPD. A further SPD is being produced to provide guidance on renewables and energy efficiency with a focus on the historic environment.</p> <p>With regards to the photos used in the document, they are intended to be aspirational examples of best practice, which represent interesting and high quality responses to a range of different contexts. Nevertheless, additional local examples have been added to balance the presentation of the document.</p> <p>It is acknowledged that the main focus is on residential development, however the principles and approach set down in the document apply equally to all types of development and this is clearly articulated in the SPD.</p>
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	<p>We especially welcome:</p> <p>Connections to and support for, local Neighbourhood Plans. The comments about the development of Neighbourhood Plans and how to integrate a locality-specific design code into the Neighbourhood Plans which we are currently developing.</p> <p>Consultation with the local community and community engagement. The code states that developers will involve communities in co-design and design workshops and work to develop a relationship between the lived environment and quality of life. That developers should consider and respond to the needs of communities within which their developments are located, is crucial for good relationships and local acceptance.</p> <p>Settlement areas. We appreciate the need to have distinct and different settlement areas to reflect the diversity of historic development within the county. However, here we have some concerns. You identify the area which we represent as ‘Settlement Edge’ within the larger category of ‘Historic Towns and Villages’ – in our case this is the City of Durham. We believe that we are not just an ‘edge’ but a small neighbourhood / village in our own right. This will also extend to other areas - Belmont, Gilesgate, Shincliffe, Newton Hall and Framwellgate Moor for example, are not mentioned at all, yet all have distinct characteristics and populations which should be reflected. We suggest that you need a seventh settlement category – e.g., ‘City Urban Expansions’ or Historic Town Suburbs’ to capture these important communities.</p> <p>We have a small number of concerns:</p> <ol style="list-style-type: none"><li>1. Durham City is not referenced in the National Character Areas at the start of the design code. As a principal settlement, we feel that it should be referenced.</li><li>2. There is no design guide relating to aspects of climate change protection, for example technical detail on requirements of solar panels.</li><li>3. The pictures included in the design guide are not from this area and could give developers unsuitable ideas of designs which would fit in our area. This has potential to be misleading and potentially contradictory to development.</li></ol>	
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	<p>4. There is very little reference in the code to commercial and retail design, it mainly focuses on residential. We feel that further work could be included on commercial design in the identified character areas.</p>	
<p>NHS Property Services (Rowan Gilbert – 1336072)</p>	<p>Health considerations in policy/design The Design Code SPD notes the importance of providing healthy and comfortable homes, and references a number of healthy design guides. NHSPS support the inclusion of these aspects but requests that further consideration of healthy design is incorporated into the SPD.</p> <p>Context There is a well-established connection between planning and health, and the planning system has an important role in creating healthy communities. The planning system is critical not only to the provision of improved health services and infrastructure, enabling health providers to meet changing healthcare needs, but also to addressing the wider determinants of health.</p> <p>The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).</p> <p>Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we would welcome further consideration of healthy design requirements within the SPD, and would encourage engagement with the NHS on this matter.</p> <p>Specific policy requirements to promote healthy developments should include:</p> <ul style="list-style-type: none"> <li>• Development proposals to consider local health outcomes</li> <li>• Design schemes to encourage active travel, including through providing safe and attractive walking and cycling routes, and ensuring developments are connected by these routes to local services, employment, leisure, and existing walking and cycling routes.</li> <li>• Provide access to healthy foods, including through access to shops and food growing opportunities (allotments and/or providing sufficient garden space)</li> </ul>	<p>Comments noted. The principles set down in the SPD establish a methodology for developers to follow to ensure development is suited to context and place. The SPD is supportive of healthy developments as it ties into other guidance - for example the Council’s Building for Life SPD, County Durham Plan and the ‘good design’ characteristics set down in the National Design Guide - which provide more detail on the specific health matters listed. Furthermore, processes are in place to ensure Development Management liaise with the Public Health team on a variety of development proposals, to ensure healthy developments. The Council has developed guidance on Health Impact Assessment to support applicants and highlight health opportunities within development proposals.</p>

	<ul style="list-style-type: none"> <li>• Design schemes in a way that encourages social interaction, including through providing front gardens, and informal meeting spaces including street benches and neighbourhood squares and green spaces.</li> <li>• Design schemes to be resilient and adaptable to climate change, including through SUDs, rainwater collection, and efficient design.</li> <li>• Consider the impacts of pollution and microclimates, and design schemes to reduce any potential negative outcomes.</li> <li>• Ensure development embraces and respects the context and heritage of the surrounding area.</li> <li>• Provide the necessary mix of housing types and affordable housing, reflecting local needs.</li> <li>• Provide sufficient and high quality green and blue spaces within developments.</li> </ul> <p>Summary NHSPS thank Durham County Council for the opportunity to comment on the Design Code SPD and hope the comments are considered constructive and helpful. We look forward to reviewing future iterations of the plan and receiving confirmation that these representations have been received.</p>	
Natural England (Antony Muller)	<p>Natural England welcomes this SPD for the practical support it offers to the adopted local plan's policies including, for example, sustainable design, landscape and green infrastructure, and the opportunity this provides to inform place making.</p> <p>In connection with the place making theme we would also like to take this opportunity to draw your attention to our recently launched Green Infrastructure Framework. This provides evidence-based advice and tools on how to design, deliver and manage green infrastructure (GI). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p>	Comments noted. The SPD has a specific focus on ensuring development that is suited to context. It includes reference to national design guidance best practice (see page 6) which promotes a balanced approach to achieving good design including public spaces and nature. While the County Durham Plan supports these requirements.



	<p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p>	
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## Schedule of changes to the County Durham Design Code Supplementary Planning Document

Page	Details	Reason for Change
3	The introduction has been reworded, incorporating new headings and a new section added which explains what each section of the document contains.	In response to numerous comments, mainly from industry, that there was a lack of clarity.
3	A 'Vision' has been added, whereby development will:  "Maintain the strong tradition of buildings which respond to and are inspired by the varied local landscape and built environment of County Durham - development will be sustainable and inclusive, conserving and enhancing local distinctiveness and sense of place."	In response to feedback from Historic England
3	Durham in context section has been rationalised.	To improve precision of the document and reflect general consultation feedback which called for greater precision.
4	The 'how to use the design code' section of the introduction has been reworked, including be simplifying the text and highlighting how applicants use the document and what they need to demonstrate in applications. This text has been refined to provide greater certainty to users and the presentation has also been improved with the addition of a new diagram to show how the Design Code works with other policy documents and in the context of design review.	To improve clarity and reflect consultation feedback.

4	Policy context section has been rationalised and a new diagram prepared to improve presentation of the document and to reflect consultation feedback.	To improve clarity and confirm policy context for the SPD.
5	The good design section has been amended to improve the layout and a diagram has been added to demonstrate what is meant by key characteristics of good design.	To improve clarity and reflect consultation feedback.
8	A map has been added of County Durham.	To improve overall presentation and provide context.
9	Typographical amendment and addition of 'Durham' to Magnesian Limestone section.	In response to feedback and to improve precision
12	Additional settlements added to list. Introductory text amended to explain selection and methodology.	In response to feedback and member feedback and to improve precision
21	Rewrite of introduction to the model code section. Feedback from industry in particular highlighted a number of concerns and misinterpretations of the scope, application and flexibility of the document.	In response to feedback and to improve clarity and precision
22-49	<p>Numerous minor changes to detailed code text, including clarifying emphasis and requirements. Feedback from industry highlighted some inconsistencies and concerns in relation to overly prescriptive requirements which have been rectified.</p> <p>Material palette diagrams have been removed as they were unclear and potentially confusing for users.</p> <p>A number of local examples have been added to the image examples to demonstrate good practice from the area/similar context to Durham.</p>	In response to feedback and to improve clarity and precision

