

THE CITY OF DURHAM TRUST

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27th February 2008
BY HAND

Dear Mr Thornborrow,

Elvet Waterside (4.08.003)

The following submission is made on behalf of Trustees. As mentioned in my letter dated 22nd February, the comments are made on the material publicly available at 19th February.

A. SITE.

1. Selection of the present Site began with a reference to the limited life of the Baths in the *Local Plan* (2004) and was extended in *Local Development Framework: Planning for the City Centre and Retailing* (2006). An extensive Elvet Waterside Site intended for redevelopment was first depicted in the Authority's *Development Brief* and in all editions of *Durham City Newsletter* intended for consultation purposes. Although both boundaries and stated size vary in the present application, it is evident that the Site is intended to extend beyond the expected boundaries shown in these two official outlets. The additions have incorporated (a) part of the Race Course (in order to soften the effect of housing to be built on the former bowling green, (b) part of the curtilages of Old Elvet properties (in order to insert some affordable housing). Trustees object to the incorporation of part of the Race Course, which is classified as AHLV and Green Belt. It is contrary to Local Plan Policy E1, the accompanying text of which reads: "It is the Council's intention that the green belt boundaries defined on the Proposals Map should remain permanent and unchanged beyond the current Plan period" (3.18).

2. Some two-thirds of the Site is manifestly a brownfield site, the remaining section technically so. The former could well be improved by appropriate redevelopment, but Trustees oppose incorporation of the latter, where Footpath 47 and an ancient bounding wall constitute a natural boundary. (This is quite evident from aerial photographs accompanying the submission – Figure 2.4 of the *Environmental Statement* or p.3 of the *Design Brief* by Redbox Architecture.)

3. Historically, Lane 47 and 48 have divided any built form from what was originally Durham Priory flood meadow, later the Race Course and then the University Sports Ground. A public bowling green was formed at the edge of the Race Course in 1944, given by the University to the City with a covenant for its public use in perpetuity. The Council, joint landowner of the development Site with the University, persuaded its partner to revoke the covenant in 2006. Three-storey dwellings on a two-metre platform will dramatically change the frontage onto the Race Course and, of course, of views inward.

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B. GENERAL LAYOUT AND DESIGN

1. The raised platform (built up to a “minimum” of 1-2.60 metres) on which all development is to be placed will impact on the overall height of the development, the prominence of its edges and on general or ‘long’ views from outside. The general increase in height can be gauged by comparing the present Site area, which is single storeyed, apart from the Baths and one 1½ dormer, with a proposed general building height which will be 3 storeys on top of the raised ground. Several properties have 3½ – 4 storeys.
2. The raised platform is at its highest on the river bank and along the north-east side. These are precisely the two most crucial boundaries. The other two join the backs of Old Elvet property and line Territorial Lane.)
3. There is no reference to/consideration of building directly on the floodplain, with non-living quarters (eg garages) on the ground floor. (This was the design of the last constructions in Elvet Waterside.) Houses approached by a short flight of steps would be feasible on parts of the Site. Such a general approach would make the whole Site more ‘permeable’ to any excessive flooding.
4. Other questions to be asked are (a) why is there no general decrease in building height towards the river and Race Course, (b) why is it necessary to move from traditional to contemporary architecture at the riverside, at the expense of overall cohesion of the ‘quarter’, (c) why is the opportunity lost to make the key entry across Baths Bridge focus on an impressive structure or to lead between two such, (d) why does the central street have to curve (Old and New Elvet do not do so), and is it not somewhat broad for what is a short street in a relatively compact development?

C. ARCHITECTURE._____

1. The riverside frontage is the most important elevation, but it promises to be the weakest. The elements form a discordant or inharmonious composition, with a heavy domestic building between two flat-roofed but dissimilar structures. The interdigitation of flat roofs is contextually inappropriate. (Monopitch roofing may be the natural complement to the massing of a whole scheme, eg Millennium Place, but not anywhere and not for individual items.) Redbox Architecture’s *Design Brief* is surely wrong when it describes the frontage as being “contemporary architecture but using a language predominantly based on Durham’s traditional architectural forms” (3.2.12). Rather, it fails the test of *Local Plan* Policies E6, E22, H7 and Q8.
2. Block C is the weakest element, with no contextual linkage for its walls of glass, topped by aluminium louvres and low flat roof. The latter, attached uneasily to a tall gable end, gives it a lop-sided appearance. (The gesture of sedum on the flat roof does not begin to justify the structure.) Its low, lop-sided appearance in relation to Baths Bridge also reduces the impact of entry from the opposite bank (See 4c above).
3. Block D is little better. It is a triangular, alien structure, exhibiting an unmistakable commercial scale, even though only the ground floor is devoted to commercial use. Thus, below its flat roof, tall glazing and large aluminium bars characterise all three

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floors. It is a prominent building in a position where any structure should be ‘tailing off’.

4. Block A is too big. Moreover, when its 3½ storeys on the river frontage are taken in conjunction with its 4 storeys to the rear along the central street, the building in fact wraps around a small, almost totally enclosed courtyard. The enclosure barely justifies the appellation open space; it is difficult to imagine people sitting out in this space. (Its dimensions compare with width of the central street. The end product will not be that dissimilar from Clements Wharf, recently completed by Red Box behind Durham Markets.)
5. The character of housing along the central street is appropriate, apart from height (Compare the west end, at Territorial Lane, with the existing building on AL(O)042/1). Its success will depend on the fine detailing, and colour of both rendering and aluminium frames, neither of which is given.
6. The scale and character of the curving crescent is the most pleasing housing, but it is in the wrong place. The curve is said to “address the open space of the Race Course,” with the gap between them providing “a subtle visual connection to the Race Course” (Redbox Architecture, p.29). The Race Course should be much more visible and not confined to a gap. Tall buildings on the former bowling green will benefit a mere seven families – a small number compared with the thousands for whom the housing will form the foreground of their view of the City from the Race Course.
7. There is a paucity of detail, and no notes on materials, for the three blocks of affordable housing. They are just plain boxes, with windows regularly- or strangely irregularly-placed. (See plans AL(O)761/2 and AL(O)763/2). They clearly do not conform to intended Council policy on affordable housing, which “should be indistinguishable in terms of style or design from the private houses in the site” (*LDF: Provision of Affordable Housing, SPD Consultation Draft (2007), 6.24*).

Surprise must be expressed at the intended low provision of affordable housing – 14 out of a total of 129 units, or 11 per cent. While the three sets of “abnormal costs” (*Planning Statement, p.32*) are acknowledged, all three were known at the time of bidding. Extra land was acquired from the University for affordable housing. Again, while it could be argued that the Authority’s critical housing SPD of March 2007 should be given limited weight, it is strange that the Council, co-organisers of the project, did not follow its own intended policy towards affordable housing. The project, after all, did seek – and currently proclaims - a “balanced” development.

D. VISUAL IMPACT.

1. The *Environmental Statement* reads that the development “does not result in a significant landscape or visual impact” (p.51). Without delving into definitions of ‘significant’, it appears self-evident from the supplied ‘viewpoint images’, as well as from everyday experience, that views of the World Heritage Site will in fact be impoverished. Accordingly, *Local Plan Policy E3* is violated.
2. The *Statement* selects nine viewpoints from which to gauge the effect of the scheme. In no less than eight of these it is conceded that the impact will be negative (pp. 48-50).

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Trustees would direct your attention to three representative views: Tow path east of Baths Bridge (Viewpoint 3), from St Hild-Bede Boathouse steps (4) and from adjacent St Cuthbert's Boathouse (11).

3. The computer-derived images of the 'model views' are very poor productions and omit important detail. In some the wide angle of vision diverts the eye from focusing on the area and background in question, tending thereby to suggest that little is to change.

E. QUESTION OF FLOODING.

1. The development at Elvet Waterside has to be built to a 100-year flood risk in order to be compliant with PPS25. Accordingly, as a result of 'ring-fencing' of the Site through building up the flood plain by a minimum of 1-2.6 metres, a compensatory flood storage scheme is proposed on a riparian strip of Maiden Castle sports ground. However, when the flood water level has filled the pool, which will surely occur quite quickly, the swollen river will then continue downstream unabated.
2. A more effective way of diverting or filtering much more flood water would surely be to allow the whole of Maiden Castle fields to assume its 'natural' role as a flood plain, with a bund around the actual stadium. (Such flooding occurred in 2000, but the embankment has been reinforced since that time.) Alternatively, some diversion further upstream might be considered. Whilst technological approaches such as dams would be prohibitively expensive, consideration might be given to a recently suggested wetlands project at Houghall.
3. As presently proposed, it is suggested that the development, raised on a raft above the floodplain, where the floodplain itself rapidly narrows as it approaches the gorge section, would in effect cause high-level flood water to swirl around the raised platform at the expense of the immediate area. The latter repercussion might well be ameliorated if the development were built, not on raised ground, but on the flood plain itself with appropriate 'layering' of uses (See B3 above). This type of development could be more porous to any high flood water movement. The Environment Agency has informed us that such flood plain development would be permissible.

CONCLUSION.

The numerous detailed points listed above concerning this major site in a sensitive location, together with the Authority's interest as joint owner of the land, confirm Trustees in their decision to ask for independent adjudication.

Yours sincerely,

D.C.D.Pocock (Dr)
(Hon Sec)

cc Government Office for the North East
English Heritage
ICOMOS/UK