

5 January 2022

Spatial Policy Team
County Hall
Durham City
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Dear Spatial Policy Team

Durham City Framework 2021 consultation document

Thank you for the opportunity to comment on the Durham City Framework 2021 consultation document.

It is very useful to see the committed and potential projects for Durham City in one place, and have them set in a strategic framework for future development. There is much to support and welcome in the document. However, the emphasis in the consultation draft is very much on economic potential; whilst the sensitivity of Durham's historic and natural environment is noted, this seems to be a secondary consideration, and phrases such as "*an innovative and flexible approach to design is needed*" are ominous. The Trust urges a more explicit recognition that the strategic setting for development here is given by the approved County Durham Plan with finer-grain detail in the Durham City Neighbourhood Plan. The strategy and development policies in the Plans are there to ensure that enthusiasm for economic development accords with the essential requirement to protect and enhance those historic and environmental qualities that make Durham City such an attractive location for investment.

The Trust suggests that more on the background of the vision and projects is needed, and it is disappointing that there is a 'business as usual' approach in that some important current trends and uncertainties have not been acknowledged or followed through. If these are not addressed, then it seems unlikely that the Framework will achieve the intended "*understanding of the synergies, phasing, relationship and physical linkages between them*", and an important opportunity will have been missed in unlocking the potential of the City. Sustainability is now increasingly coming to the fore and a response is needed to climate change through understanding of impacts and how projects should respond. The Trust offers the following three major sustainability issues that now must be taken into account.

1. An overprovision of office floorspace.

There is an assertion under 'Challenges to Growth' of needing to identify sites for high quality office space. The Trust considers that more than enough sites for office space in Durham City have already been identified and that no further sites need to be found. The total approved provision of office floorspace seems excessive in relation to achievements in the last 10 years or so where the relatively few jobs created by Atom Bank has frequently been quoted as evidence

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of potential demand. With Milburngate Phase 1 and the DCC development by the river nearing completion, additional capacity looks to be unjustifiable, and alternatives should now be considered in this framework document to avoid long-term unoccupied buildings and undeveloped sites.

2. The decline of the City centre.

The dramatic decline in shopping demand brought about by the increase in online shopping, and supercharged by Covid effects, has not been acknowledged. The continuing diminished viability of City centre shopping needs to be addressed head-on, and this document needs to make a clear commitment to arrest that decline. To consolidate the shopping area may require the re-definition of the city centre and a pause in the provision of additional floorspace and free parking in nearby out-of-town locations. Without positive action to reverse current trends, the shopping area will decline further and become prey to opportunistic development. Currently, underpinning of the city core is through student accommodation; this is a precarious approach if the University undergoes changes in its strategy and business plan; a sustainable community with all its necessary components is desirable. Retail street use has been supported in its changes elsewhere by looking at more community-based use beyond retail, we have simply got more students. The shopping centre is contracting and changing in nature in a piecemeal way, planning application by planning application. The County Council needs to get a grip of these manifestations and shape a coherent strategy for the future of the Durham City centre.

3. The impact of University development.

The list of University projects will be transformative for both the University and the City. Both the positive benefits and negative impacts of these expansion plans on the capacity of this small city and its residents should be assessed before this framework is finalized. With so much public money to be invested in University development, it is important that these developments provide real benefits in terms of access and use to the general public.

The Trust particularly questions the Key Principle of *“facilitating the appropriate growth of Durham University”*. The University now has 22,220 students and is already above the Strategy and Masterplan target of 21,500 students in the year 2026/27. There must be no further so-called “appropriate growth”, this city simply cannot bear an even worse imbalance between the resident population and the half-year student population. The Trust draws attention to the words of the County Durham Plan Examination Inspector in his Final Report Paragraph 261: ***“However, whilst the Plan should be effective in accommodating the currently identified growth in student numbers, the limited size of the city and its particular physical and historic character mean that there may be limited capacity for further growth in the city in the longer term.”*** He did not need to state this, but chose to do so, and his words should be a warning shot across any supposition that further growth beyond 21,500 students is appropriate.

Working with Partners

Under the ‘local communities’ section the Trust is grateful to be included. The list of local community groups has a couple of misnomers: it should be the St Nicholas Community **Forum**, and we are not aware of a **Stockton Road** Residents’ Group; perhaps this should instead be the

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Elvet Residents' Association. Under 'Durham University' you will no doubt have noticed that the entire paragraph beginning with "The County Council recognizes...." is repeated.

The projects

The Trust suggests that a modification to the presentation of the projects would aid understanding of the extent to which these projects cumulatively match the promise of a sustainable future. It would be helpful to:

- **group the projects** together under the main themes ie business and industry, housing, environment, transport and community.
- **identify a level of commitment** to all projects, perhaps colour-coded eg commenced or soon to be implemented, commitment to early implementation, under active consideration, new and untried project.

Some of the project descriptions need to be updated or corrected:

- *Number 8 Sherburn Road* - the number of dwellings approved by the County Planning Committee is not 475, it is 500.
- *Number 18 Miners Hall* - this text is out-of-date and is better covered in *Number 25 Renovation of Durham Miners' Building* (they are one and the same building).
- *Number 42 James Barbour House* - it is James Barber House.
- *Number 52 Durham City Coach Drop Off* - The Trust would strongly commend a related project to re-instate the tourist coach drop-off and parking facility on the former area of Common Land on The Sands.
- *Number 55 New Elvet Bridge* - not only started in July 2020, it is completed and open.

The Trust would be very glad to discuss the above points with appropriate officers in helping to arrive at a final Durham City Framework 2022 document.

Yours sincerely

John Lowe

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Chair, City of Durham Trust