

c/o Blakett, Hart & Pratt, LLP
Aire House
Mandale Business Park
Belmont
Durham, DH1 1TH
13 April 2022

Dear Ms Hurton,

DM/22/00229/AD 17 - 18 The Riverwalk Millburngate Durham DH1 4SL
Erection and Display of 2 no illuminated fascia signs

1. The Trust objects to the application based on the level of illumination of the signs and their negative impact on the river frontage, Conservation Area and World Heritage Site (WHS).

Context

2. The Riverwalk terrace is now a viewing area for the WHS and City centre and a positive benefit. In sharing the view, it is also conspicuously on view from those areas. The now almost complete colonisation of the terrace units by leisure uses has substantially increased the amount of night-time intrusion from illuminated signage. There is cumulative negative impact on the City's and WHS's night-time setting. Maintaining the dark river corridor should be a requirement and is essential in allowing night-time dominance of the WHS and its illumination.

Proposal and Impact

3. The intensity of illumination for both signs greatly exceeds the suggested limits for signage. This will make them very conspicuous and add to the cumulative negative impact of signage along the Riverwalk terrace.

4. A key material source for consideration of such lit advertisements is the Institute of Lighting Professionals – The Brightness of Illuminated Advertisements (PLG05) 2015. This recommends limits of 300 candela per metre square (Cdm/m²). The submitted proposals are both 2000Cdm/m². This is considerably more than the recommendation and is a clear indication of the high level of proposed illumination that will cause negative impact.

5. There is no justification for such a high level of illumination. Given the surrounding low light levels and cross-river views, it will clear where the two premises are and what their function is.

Policies

6. The Trust considers that the proposals fail against the following planning policies:

County Durham Plan

Policy 29 Sustainable Design

- a. The proposals fail to contribute positively to an area's heritage significance and townscape

Policy 31 Amenity and Pollution

The proposals will have an unacceptable impact such as through visual intrusion, and visual dominance, without satisfactory mitigation measures. The development does not minimise light

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pollution and demonstrate that the signage lighting proposed is the minimum necessary for functional purposes.

Policy 44 Historic Environment

Conservation Areas

f. The proposals fail to demonstrate understanding of the significance, character, appearance and setting of the conservation area and how this has informed proposals to achieve high quality sustainable development, which is respectful of historic interest, local distinctiveness and the conservation or enhancement of heritage assets.

g. The proposal fails to respond positively to the findings and recommendations of a conservation area character appraisal.

Durham City Neighbourhood Plan

Policy S1: Sustainable Development Requirements of all Development and Redevelopment Sites Including all New Building, Renovations and Extensions

c) Fails to harmonise with its context in terms of scale, layout, density, massing, height, materials.

d) Fails to conserve the significance of the setting, character, local distinctiveness, important views, tranquillity and the contribution made to the sense of place by Our Neighbourhood's designated heritage assets.

Policy G1: Protecting and Enhancing Green and Blue Infrastructure

Protecting green and blue assets

Protecting and enhancing the banks of the River Wear

Protecting dark corridors

As a development proposal that incorporates new lighting it has not been designed to minimise any ecological impact and avoid significant harm to existing dark corridors.

Policy H1: Protection and Enhancement of the World Heritage Site

The development proposals to a minor degree do not sustain, conserve, or enhance the setting of the World Heritage Site by causing negative impact on the setting.

f) The proposals fail to protect important views

Policy H2: The Conservation Areas, Durham City Conservation Area

The development proposals negatively affect the Durham City Conservation Area by not taking into account, and meeting, the following requirements,

g) Protecting important views of the Durham City Conservation Area from viewpoints within the Conservation Area; and

j) Using materials, detailing, and lighting appropriate to the vernacular, and setting.

Based on these policy failures, the Trust objects to the proposals as currently submitted.

Should lit signage be approved, it should be conditioned to ensure it is turned off outside of opening hours.

Yours sincerely

John Lowe,
Chair, City of Durham Trust