THE CITY OF DURHAM TRUST

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

Dear Ms Hurton,

DM/22/01093/FPA Durham Sixth Form Centre The Sands Durham DH1 1SG *Provision of 2 no. timber clad modular classroom blocks and newly created footpath*

The Trust wishes to object to this application based on loss of greenspace, negative impact on the Conservation Area, adjacent buildings, and a notable unlisted heritage asset.

Context

Freemans Place is one of the approaches into the City Centre and provides a link to the now reduced Sands common area and to Kepier. The open space within the Sixth Form Centre site is an important character-defining part of the setting for Freemans Place, the Swimming Pool and the Lodge and the Ian Scott/Niven Architects designed Arts buildings. By extension, it is a significant asset to the Conservation Area. Also, with some irony, it forms the setting to the frontage of the former Durham County Council HQ building that is now transferred to the University. It provides a link with the original County Girls School building (a notable unlisted heritage asset in the Durham City Neighbourhood Plan). It was the playing fields for the school and, although obscured in part by newer buildings, it still offers a view to the original buildings.

The swimming pool is a strong design presence and relies on the open space for its setting and views out from the building. Contrary to the description in the applicant's submission as having a 'concrete façade', much of the facade is glass and the upper part is modulated with a bay and large window openings. The glass section has an etched public artwork, designed to work in combination with themed landscaping on the outside. This relies on an open outlook for impact. The 'needles' artwork constructed in association with the Swimming Pool, also relies on the open grass area for impact.

The intensification of buildings and car parking has radically reduced the quality of this part of the Conservation Area. The overwhelming monolithic frontage and the extent of the former DCC HQ building has forced that building into confrontation with the green spaces around it. Its cumulative impact has led to the construction of the new multi-storey car park and forced the Sixth Form Centre into cannibalising its tennis courts for parking.

The Sixth Form Centre has been subject to a number of proposals; the car park, the multimedia centre with high impact cladding, the extension of the Arts block altering its distinctive character, and extension of the Lodge also breaking its relationship to the open space and original school building. A substantial part of the Sixth Form Centre site is now given over to car parking. This contrasts with the new Business School use of the DCC HQ building and both the NSI and Passport Office buildings. All rely on alternatives to car access.

THE CITY OF DURHAM TRUST

Despite all these negative changes the open space has maintained its positive contribution – it could be considered have greater importance now in holding together the 'campus' of buildings surrounding it.

Proposal

The modular buildings are utilitarian and have no design merit. Their siting and design are completely lacking in any overall site planning or respect for their context. They effectively 'kill' the quality of the open space, destroying the relationship with the swimming pool, needles artwork, arts building, original school building and the Lodge with its extension. They represent a significant failure in forward planning – why is the new NHS training being provided if there is no accommodation for it? This certainly should not be used as a justification for such a low quality, damaging proposal. If there is such an urgent need for new buildings, why not look at the ex-tennis courts area and its car parking? Reducing car parking provision would bring the Sixth Form Centre closer to the more sustainable approach adopted for the large office/University buildings nearby. However, such an approach would need considerably greater attention to design and impact than demonstrated in the current proposal.

Policies

In detail, as submitted, the proposal fails against the following policies:

County Durham Plan Policy 44 Historic Environment Conservation Areas

The proposals fail to:

- f. Demonstrate understanding of the significance and character and appearance of the conservation area and how this has informed proposals to achieve high quality sustainable development, which is respectful of local distinctiveness and the conservation or enhancement of the asset;
- h. Respect and reinforce the established, positive characteristics of the area in terms of appropriate design (including, features, materials, and detailing).

City of Durham Neighbourhood Plan

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

Conservation, preservation, and enhancement of Our Neighbourhood

The proposal fails to:

- c) Harmonise with its context in terms of materials;
- d) Conserve the significance of the setting, character, local distinctiveness, and the contribution made to the sense of place by Our Neighbourhood's non-designated heritage assets.

Policy H2: The Conservation Areas - Durham City Conservation Area

The proposals fail to:

- a) Sustain and enhance the architectural qualities of a building,
- e) Avoid harm to an element of an asset which makes a positive contribution to its individual significance and that of the surrounding area.
- j) Have materials and detailing appropriate to the vernacular and context.
- k) Use high quality design sympathetic to the character and context of the local area and its significance and distinctiveness.

THE CITY OF DURHAM TRUST

Policy G1: Protecting and Enhancing Green and Blue Infrastructure Protecting green and blue assets

The development proposals fail to avoid the loss of existing green assets (as defined in paragraphs 4.71-4.72) with significant recreational, heritage, cultural, landscape and townscape value and therefore cannot be supported. The loss of this green asset of significant value is not unavoidable and alternative equivalent provision can be provided on-site or off-site.

The Trust objects to the application, based on the above points. To allow this application will be to abandon any responsibility for conserving the quality of the Conservation Area and its assets.

Yours sincerely

John Lowe, Chair, City of Durham Trust