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25 April 2026

Ms Louisa Ollivere  
Durham County Council  
Planning Department  
PO Box 274  
Stanley  
County Durham DH8 1HG

Dear Ms Ollivere

**DM/26/00566/FPA: Revised scheme, incorporating amendments,  
for the redevelopment of the existing shopping centre,**

*comprising partial demolition of the shopping centre above the existing mall level (Levels 5 and above) and erection of replacement commercial units (Class E), and purpose-built student accommodation (Sui Generis) at Level 5 and above, along with a new outdoor public square and public realm improvements. External alterations to the boat repair and maintenance workshop including use of external area to create outside terrace (Class E), external alterations to the elevations of the retained areas of the shopping centre and car park, hard and soft landscaping and other associated works,  
Prince Bishops Shopping Centre, High Street, Durham DH1 3UJ*

The City of Durham Trust has given very careful consideration to this extremely significant amended proposal. You will be aware that we commented in detail on the previous proposals which were approved in May 2025. We have the following comments to make on the amended scheme.

**Design concerns**

There is much to welcome in this revision, as there was in the original scheme. On the riverfront the reduction and recladding of the stair tower will reduce the high impact of the original discordant design. The introduction of the public space overlooking the river should aid the use and vitality of the centre. It also breaks up and draws back the mass of building when compared to the existing mass, reducing the adverse impact on the frontage. The remodelling of the more controversial existing roofing features and reduction in scale of component elements will help assimilate the centre more into Durham's townscape.

It is an inevitable consequence of the overall scale of the development and the uniformity of its proposed new use as a PBSA that there will be design consequences that remain in more negative contrast with the city's townscape. There is some reduction in the complexity of the roofscape along the Leazes Road frontage that is a backward step in reducing impact.

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The sample details show a strong approach to detailing and use of brick which, when read in isolation, are sympathetic to Durham's townscape. When multiplied, the overall impact is to create something that is more monotonous. This is a consequence of the use and the scale of the development. The Trust comment is therefore that, as details are worked through, a carefully coordinated greater range of frontage treatments should be considered along the Leazes Road and river frontage.

## **Active travel accessibility**

A further design issue is that the pedestrian crossings of the Leazes Road vehicle access points remain very difficult because of levels and frequency of vehicle movement. The Trust considers that improvement of these is needed. The Trust agrees with the response from Active Travel which highlights the need to assess the quality of the active travel routes robustly, rather than simply relying on proximity to justify accessibility. This will need to include consideration of the widths of footways and peak pedestrian flows, as key routes to the university, such as Church Street, already fail to meet pedestrian comfort levels. The applicant includes an extract of a cycle map of Durham in the Transport Statement, but ignores the fact that none of the routes on the map connect the site conveniently with the main university campus. The applicant should be asked to provide a proper assessment prior to determination of the application.

## **Student numbers**

The provision of more student accommodation in Durham is a controversial issue, and we made clear in our comments on the preceding scheme that the claimed quantitative need for additional student beds in Durham as put forward by the applicants was based upon a fundamentally erroneous assumption that the increase in student numbers here in recent years would continue. That unplanned increase was due to the distorted A level results during Covid. The University has successfully reduced numbers back down to stability at around 21,500 and is committed to keeping numbers at around that figure.

In fact, the latest publicly available Higher Education Statistics Agency figures are that the number of full-time students (surely the market for PBSA places, and the metric used for this application) has fallen from 21,550 in 2022/23 to 20,425 in 2024/25.

Any speculation about longer-term numbers is not sensible, and indeed the applicants themselves say at Paragraph 4.24 of their 'Student Accommodation Needs Assessment' report that *"it is not possible to assess quantitative need beyond 2027 at present, and the analysis presented previously does not seek to do so."*

For the avoidance of any doubt, recognising that applications for more HMOs and for new PBSAs continue to be made, the Trust takes the position that the proposal for up to 504 student beds in this location is acceptable in principle even though there are already more than enough bed-spaces in the city to accommodate all of the University's students. We hold that it is the University that determines how many students there will be here, not how many beds there are. It follows that every occupied bed in a well-located PBSA is one fewer in an HMO.

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It is also important to recognise that the surplus of student bed spaces has successfully eradicated the panic queuing of a few years ago and is leading to fewer students occupying unsafe, damp and mouldy rooms. Moreover, the current supply will somewhat diminish because there are expected to be several hundred College bed-spaces taken out of availability for a while due to the need for refurbishment and up-grades. In summary, the Trust regards the Prince Bishops Place PBSA as being in a suitable location and appropriate in the type of accommodation it will offer, but we will continue to oppose planning applications for PBSAs in unsuitable locations or of unsuitable types.

## **Boat hire**

The Prince Bishops river cruiser and Brown's rowing boat hire are widely valued as a long-standing component of Durham's traditional visitor offer. The Trust asks again whether this use is prejudiced by what appears to be a proposal to convert the boat store to leisure use. There is no indication of the operators' response to these changes, and the Trust would object to the loss of boat cruises and hire.

## **Cycle parking**

The applicant continues to propose the use of two-tier cycle racks in an enclosed area within the existing multi-storey car park. The aisle between the facing two-tier racks is shown on the plan as only 1300mm. This is extremely cramped. Reviewing the guidance from a typical manufacturer of racking, the *minimum* aisle between opposing two-tier cycle racks is stated to be 2000mm. There is also nowhere to store non-standard cycles. Cycle parking is required by Neighbourhood Plan policy T3 to be adaptable, if possible, to storing other types of mobility aid, and for electric power to be available for charging. There are no grounds for not complying with this policy. Redesigning the cycle parking correctly will require more car park spaces to be given up, but there is no shortage of these.

The Trust notes that all the secure cycle parking is proposed to be provided at river level. The applicant has provided no analysis of the quality of cycle routes, nor how cyclists are to access these routes from the development. There is a strong case for providing some secure cycle parking at High Street or New Elvet Bridge level. Considering the reliance on marketing a large PBSA as "car-free" this is a serious omission.

There is apparently no short-stay cycle parking to be provided for visitors to retail and leisure facilities at High Street level. This was requested by Active Travel England in their response to the previous application, and it would be fair to assume the same advice would apply now. The Transport Statement para. 5.5.4 notes a need for 18 short stay cycle parking spaces, and para. 5.5.6 states that 20 spaces will be provided in the form of Sheffield stands. These do not appear to be at High Street level, and might appear in the "Level 5" masterplan situated adjacent to the Leazes Bowl roundabout. This is perhaps the least cycling-accessible location in the whole of Durham, and is completely unacceptable. Short -stay cycle parking should be distributed at various locations along the High Street, and could be grouped with seating and/or planters.

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Regarding the design and location of the cycle parking, the Trust would be content with a planning condition being applied to require more detailed plans of the cycle parking to be provided and approved by the planning authority, including adequate short-stay cycle parking at High Street level. The condition should require the plans thus approved to be implemented prior to occupation of the relevant part of the development.

## **Retail and city centre vitality**

The current retail environment is recognised as a major driver for the proposals in this application. The Trust has major concerns about the impact on retail both during and after the construction works.

The Trust has seen the extent of the mostly unplanned new leisure provision in the Riverwalk and Milburngate redevelopments and historic streets. CDP Policy 9 accepts non-retail uses within Primary Shopping Areas “where they preserve the vitality and viability of the Primary Shopping Areas”. The Environmental Statement addresses this in paragraphs G5.66 to G5.73. Paragraph G5.70 notes that independent retailers require smaller floorplates than those that are currently provided. The Environment Statement makes no comment, however, on the needs of larger chain retailers.

Following the redevelopment of Riverwalk and the loss of the former Marks and Spencer building, there are now very few retail spaces suitable for larger stores in Durham City. Some larger units are essential to sustain the vitality of a shopping area. The Trust is concerned that the proposals to eliminate the larger units in the current Prince Bishops centre will leave the city centre completely unable to stand its ground in competition with the District Centres at Arnison and Dragonville. Durham City is identified as one of just two Sub-Regional Centres at the top of the retail hierarchy in Policy 9. It is by far the most sustainable location in terms of transport. Policy 9 requires that the council “protect and enhance” the centres identified in the retail hierarchy.

The numerical estimates of the economic benefits of the proposals in terms of jobs created and GVA have been significantly reduced by comparison with the previous 2024 application, yet the assessment of benefit has been restated in more positive terms than previously (Environmental Statement, G5.73). See the appendix for further analysis of these differences. The Trust urges the Planning Authority to exercise caution in the weight given to these claims.

The developers have made statements regarding the viability of the current retail units, but the application does not include financial data of the sort that would allow the Planning Authority or decision-makers to judge whether the proposals are a proportionate response to changing market conditions, or primarily designed to maximise property income at the expense of harming the city centre's function at the top of the retail hierarchy. There will need to be support for key retail providers to ensure that they do not permanently abandon the city centre during what is going to be a protracted construction period.

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## Conclusions

The Trust is broadly supportive of the amended scheme for the redevelopment of Prince Bishops Place but has a range of concerns the applicant should address. These include design and transport issues and the apparent loss of the boat hire facilities. The Trust rejects the claimed quantitative need for more student accommodation in Durham, and has concerns about the loss of the remaining large floorplate retail space.

Yours sincerely,

**John Lowe**

Chair, City of Durham Trust

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**Celebrating, Protecting and Enhancing the City of Durham**

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## Appendix

The Trust notes various revisions in the Environment Statement, Chapter G, since the version attached to planning application DM/24/00705/FPA. Many of the paragraphs read identically, but data and conclusions differ.

The conclusion of the section on “Vitality and Vibrancy of Durham City”, para. 5.76 in the 2024 version (emphasis added), stated:

The impact of the new employment opportunities generated by the Proposed Development on deprivation in the AOI is considered to give rise to a permanent **Minor Beneficial** effect. This is considered to be **Not Significant** in EIA terms.

The equivalent paragraph in the current version, 5.73, states:

The impact of the reconfigured retail floorspace and delivery of new employment opportunities generated by the Proposed Development on vitality and vibrancy of Durham City in the AOI is considered to give rise to a permanent **Moderate Beneficial** effect. This is considered **Significant** in EIA terms.

While the two statements differ in their focus, the 2026 version referring to Durham City, rather than the County Durham AOI, if you examine the estimated employment figures, the GVA generated, and other quantitative estimates earlier in the same chapter, the 2026 figures are substantially less beneficial than the 2024 estimates, even just for Durham City. For example, the 2024 total GVA was estimated at £6.8m, but the 2026 estimate is £4.7m. The net employment generated by the development is now estimated at 82.5 posts, but was 145 in 2024. The difference is accounted for by the deletion of the hotel proposal (25 jobs) and a decrease in the retail estimates. The increase in the size of the PBSA has made no difference to the employment estimates.

Despite these challenging figures, the chapter concludes with an updated assessment of the benefit from Minor to Moderate, and a change from Not Significant to Significant. The Trust questions the validity of this assessment.

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