

Durham City Neighbourhood Draft Plan for Public Consultation – December 2017

This note covers areas of the Draft Neighbourhood Plan where Durham University (DU) makes comments. This note reflects the plan released in November 2017.

As a general point, the Neighbourhood Plan in place, refers to the University variously as the ‘Durham University’ ‘University of Durham’ and ‘the University’. This should be consistent in approach and changed to ‘Durham University’ if directly pertaining to the University or ‘Higher Education Institution’ if it is a more general comment. Also references to ‘colleges’ should be clear whether they pertain to University residential accommodation or Further Education Colleges.

Chapter 2: Introduction		
Section 2.2 Challenges		
Reference	Existing text where appropriate	Proposed Action & Comment
Paragraph 2.6 and 2.7, page 5	<p>2.6 Durham University’s expansion from about 3,000 students in the early 1960’s to 15,500 in Durham City today has added much economic benefit as well as prestige to the City. However, a commensurate increase in university accommodation has not been provided and many family homes have been converted into student accommodation to the extent that in several areas permanent residents are a minority and in some a rarity.</p> <p>2.7 This change in property use means that large areas of the City are predominantly populated by young adults for half of the year and virtually empty the other half with consequent effects on local shops, facilities and community cohesion. The local retail offer has suffered from a loss of independent family-friendly shops and department stores. Leisure facilities are geared to the evening economy. The city has lost its internationally renowned ice rink, its multiscreen cinema (though this is currently being replaced), much green space and sporting facilities, youth clubs and scout and guides groups. Schools, doctor’s libraries and other public services are affected by the distorted population structure of the city. The university has recently published a strategy and Estates masterplan (Durham University, 2016, 2017a) setting out its intention to grow in student numbers to a total of 21,500 in Durham city by the year 2026/27. This raises major issues around the capability of the city- socially, economically and environmentally- to accommodate significant additional pressures on the housing stock, local services, the retail offer, pedestrian congestion, and community balance.</p>	<p>The University considers these paragraphs to be unnecessarily pejorative.</p> <p>Over the same period most towns and cities have had a similar evolution due to the changing residential, retail & leisure preferences of the local populace.</p> <p>These paragraphs suggest that the changes faced by Durham City are purely as a result of the growth of Durham University which is an overly negative interpretation.</p> <p>The University considers that its growth has actually insulated Durham City from the worst of deprivations suffered by much larger towns and cities in the North East such that the city continues to be an attractive place to live, work, study and invest.</p> <p>Therefore we request that these paragraphs be rewritten in a neutral tone.</p>

Chapter 4: Planning Policies & Proposals for Land Use		
Reference	Existing text where appropriate	Proposed Action & Comment
Page 30, Paragraph 4.43	The Cathedral, the largest and most perfect monument of Norman architecture in England,	The phrase “most perfect” doesn’t make sense, it is either perfect or it isn’t. Use “best” instead.
Policy H4: Our Neighbourhood Outside the Conservation Areas		
Reference	Existing text where appropriate	Proposed Action & Comment
Policy H4: Para 4.54: page 38	are the Hill Colleges and University Science Park, the Botanical Gardens	Reword: are Durham University’s Hill Colleges, Upper and Lower Mountjoy, the Botanic Gardens
Policy H4: Para 40: Page 38	Tollhouse Road	Toll House Road
Policy H4: Para 40: Page 38	the University Hill Colleges, Science Park and Botanic Gardens	Reword: are Durham University’s Hill Colleges, Upper and Lower Mountjoy, and Botanic Gardens
Chapter 4: Planning Policies and Proposals For Land Use		
4.2(B): Theme 2b: A Beautiful and Historic City – Green Infrastructure		
Reference	Existing text where appropriate	Proposed Action & Comment
Policy G2: Designation of Local Green Spaces Page 49 Map 6 on page 52	G2.1: Green spaces within Our Neighbourhood that are of significant environmental, landscape or historical value are designated as Local Green spaces. These areas, as shown on the proposals map, comprise: 1. The River Wear corridor that lies within Our Neighbourhood; and 2. Observatory Hill; and 6. Woodland on the south side of the City, comprising Maiden Castle Wood, Great High Wood, Hollingside Wood and Blaid's Wood; and	There are several University sites allocated under this policy. Reviewing Map 6 in general it appears the majority of these allocations about operational land but do not impinge it. Part of the allocation on Observatory Hill is a DU site. The University views this land as operational or with operational potential and <u>would not</u> wish this to be allocated as Local Green Space. Please see the amended Map 6 attached with the area for deletion marked in red.
Policy G3: Creation of the Emerald Network Page 54 Map 7 on page 56	G3.1: An Emerald Network is designated which comprises sites of wildlife interest within Our Neighbourhood linked by public footpaths. These sites comprise designated wildlife sites, such as Local Nature Reserves, Local Wildlife Sites, Ancient Woodland Sites, key green sites, such as parks and gardens, and the River Wear and the riverbanks. The sites included in the Emerald Network are:	There are several University sites allocated under this policy. Reviewing Map 7 in general it appears the majority of these allocations about operational land but do not impinge it. Part of the allocation for G3.1.6 has expanded beyond the Botanic Garden boundaries and

	<p>5. Low Burnhall</p> <p>6. Durham University Botanic Gardens; and</p> <p>7. Hollingside Wood, Great High Wood, Little High Wood, Blaid's Wood; and</p> <p>8. Houghall/Maiden Castle</p> <p>9. Pelaw Wood</p> <p>& 10. Peninsular woodlands</p>	<p>includes part of the Howlands Farm residential site. We require the boundary to be redrawn to remove this operational area.</p> <p>Part of the allocation for G3.1.9 has expanded beyond the boundary of the wood and includes part of the College of St Hild and St Bede residential site. We require the boundary to be redrawn to remove this operational area.</p> <p>We reserve the right to object to the other allocations if it could affect operations.</p> <p>Please see the amended Map 7 attached with the area for deletion marked in red.</p>
<p>Justification for Policy G4 page 57 at Paragraph 4.86</p>	<p>The NPPF (section 9) attaches great importance to the Green Belt and to its protection from development protect greenbelt. Inappropriate development "should not be approved except in very special circumstances" (NPPF, para 87). The Forum and local people, as shown by responses to the Forum's survey (Durham City Neighbourhood Planning Forum, 2015) and by community bodies such as 'The Friends of Durham Green Belt', do not consider that there are any very special circumstances (NPPF, para 88) present in Durham City that would merit development on the Green Belt (except for permitted development allowed by the NPPF (para. 89, 90)). Therefore no policy in our Neighbourhood Plan includes development on the Green Belt. The Green Belt is particularly important to Our Neighbourhood because of one of its purposes "to preserve the setting and special character of historic towns" (NPPF para. 80).</p>	<p>This paragraph appears contradictory.</p> <p>What weight is to be given to the comment regarding the forums survey responses and Friends of Durham Green Belt that there aren't any special circumstances in Durham City for development on the green belt, as the next sentence says that there are sites which do have special circumstances?</p> <p>In planning terms it is for the applicant of a development proposal to demonstrate 'very special circumstances' in accordance with the NPPF.</p> <p>The NPF should ensure that this policy doesn't contradict existing planning policy.</p> <p>Neighbourhood plans cannot seek to allocate areas of land for development within existing green belts. This position was reaffirmed in the response to recommendation 7 of the CLG Select Committee Inquiry into the operation of the NPPF (full report: goo.gl/oaVKvs).</p> <p>The plan contradicts this with the allocation of E2.1.1 which is in the Green Belt</p>
<p>4.3: Theme 3: A City with a Diverse and Resilient Economy</p>		
<p>Reference</p>	<p>Existing text where appropriate</p>	<p>Proposed Action & Comment</p>
<p>Policy E1: Larger Employment sites</p>	<p>Support will be given to the development of larger sites suitable for the creation of</p>	<p>2. This refers to Upper Mountjoy & is a legacy of the 2004 City Plan.</p>

Page 64 Map 8 Page 69	<p>employment subject to conformity with strategic employment sites as shown on the proposals map.</p> <p>2. A site for science and high technology developments and business start-ups and incubators on the Durham Science Park, Mountjoy, which fall within use class B1a (Business - offices) and B1b (Business - Research & Development).</p>	<p>This University's intentions have changed in the last 13 years and this allocation could conflict with the Masterplan which proposed a Higher Education use for science faculties.</p> <p>Request widening of scope & text of policy to include educational uses.</p>
Paragraph 4.110 Page 65	<p>Durham Science Park, shown on the proposals map, is owned by Durham University and is situated next to the Mountjoy Research Centre. It has good access both to the University and the City. Science Parks usually consist of low-density development located in close proximity to a university campus, thereby allowing for the creation of close links between academic institutions and business. As such the site is well situated for start-up and incubator businesses.</p>	<p>As above.</p>
Paragraph 4.109 Page 65	<p>Site E1.2 - Mountjoy - a minimum buffer of 15m of native tree planting is required against the ancient woodland and the wetlands.</p>	<p>This is too prescriptive and wouldn't be considered to be appropriate. It should be for the planning application to determine whether such mitigation/detail is appropriate (it may be greater or lesser than 15m) in the context of a proposed scheme.</p> <p>Reword: "a buffer of native tree planting is required against the ancient woodland and the wetlands."</p>
Policy E2: Other employment sites Page 66	<p>E2.2: support will be given to the development of... Residential, including units for older people, families with children and young professionals.</p>	<p>Either "families with children, and young professionals". Or "young professionals and families with children."</p> <p>Also paragraph 4.114</p>
4.4: Theme 4: A City with Attractive and Affordable Places to Live		
Reference	Existing text where appropriate	Proposed Action & Comment
Paragraph 4.135 Page 76	<p>A further issue now emerging is that the University of Durham (2016) is developing its Masterplan for the growth of the University over the next 10 years. This will be helpful in displaying the University's aspirations for</p>	<p>This needs to be deleted/reworded to remove the emotive language regarding the masterplan.</p>

	physical development. If adopted it will, however, further squeeze the very limited availability of sites for various forms of residential development.	Further the NPF cannot assume that landowners will want to develop certain sites for residential use (whether private dwellings or PBSA) therefore the Masterplan is not relevant in this regard beyond its stated aims.
Policy D2: Student Accommodation in Houses in Multiple Occupation (HMO) Page 82	Text is largely the same as the current interim policy, with the exception of: “will not be permitted if more than 10% of the total number of properties within 100 metres of the application site are already in use as HMOs or student accommodation exempt from council tax charges or the student population exceeds 20% of the total population in that area.”	This is a strategic issue and should be dealt with at a higher planning level. NPF plan area doesn't cover all of City and so will have different policies for different areas. This policy is too prescriptive – unless developers and landlords can access the Council's database, this cannot be monitored prior to submitting an application. Policy also uses two different measures; 10% of properties & 20% of the total population. Considered to be difficult to accurately ascertain total population of an area.
Policy D3: Purpose Built Student Accommodation (PBSA) D3.1.3 Page 83	“3. consultation with the relevant education provider.”	This could be strengthened by the addition of “Priority will be given to schemes which are part of the relevant education providers' plans or which are being progressed in partnership with the relevant education provider.”
Policy D3: Purpose Built Student Accommodation (PBSA) D3.2.1 Page 83	“D3.2: Development proposals will not be permitted unless: 1. not more than 10% of”	Double negative. Reword: “D3.2: Development proposals will be permitted if: 1. not more than 10% of”
Policy D3: Purpose Built Student Accommodation (PBSA) D3.2.1 & D3.2.2 Page 83	D3.2: Development proposals will not be permitted unless: 1. not more than 10% of the total number of properties within 100 metres of the application site are already in use as HMOs or student accommodation exempt from council tax charges or the resulting student population is not more than 20% of the total population in that area; and 2. the development is on or adjacent to an existing university or college academic site, or hospital and research site;	It appears that D3.2.1 & D3.2.2 are contradictory. It is likely that sites adjacent to existing University sites, specifically the Hill Colleges, would fail the test in 1 and so would be unacceptable development. Therefore suggest a reword to: “...total population in that area; or”
Policy D3: Purpose Built Student Accommodation (PBSA)	The development is on or adjacent to an existing university or college academic site, or hospital and research site; and	Clarify if 'college' means an FE College or University residential college. If latter, remove text “academic”.

D3.2.2 Page 83		<p>What is the definition or test of adjacent in this context?</p> <p>Also some sites on excellent public transport links and close to existing retail and residential centres may be more sustainable than ones adjacent to existing academic sites. There should be a qualitative element to what constitutes an acceptable site.</p>
Policy D3: Purpose Built Student Accommodation (PBSA)	No sites are allocated for PBSA development	<p>The University would like to put forward the following sites for redevelopment as student accommodation:</p> <ul style="list-style-type: none"> - Elvet Hill car park - Land at Green Lane - James Barber House - Mill Hill Lane <p>And these sites for in-fill development of student accommodation:</p> <ul style="list-style-type: none"> - Leazes Road - Land adjacent to St Aidan's College - Land adjacent to St Mary's College <p>Please see attached plans.</p>
4.5 Theme 5: A city with modern and sustainable transport infrastructure		
Reference	Existing Text where appropriate	Proposed Action and Comment
Policy T2: Designing for sustainable transport page 101	T2:1: Design of walking and cycling infrastructure throughout our neighbourhood should accord with design guidance: Active Travel (Wales) Act 2013	The vast majority of DU student's access the University on foot or by bike. The University are improving access for students and staff on land under our control through projects included in the Masterplan and therefore support the NPF's policy to improve the walking and cycling infrastructure throughout the plan area.
4.6 Theme 6: A City with an Enriched Community Life		
Reference	Existing text where appropriate	Proposed Action & Comment
GP Practices: Paragraph 4.217 Page 108	There is currently only the Claypath surgery in Our neighbourhood available to permanent residents. There is also a former surgery, the ST Margaret's Health Centre, on Crossgate near the traffic lights at the foot of	<p>"it seems reasonable to infer that some expansion..."</p> <p>NPF should speak to medical practices and NHS Care Commissioning group and ascertain</p>

	<p>the peth. Most of the students are registered with The University Health Service, which is part of the Claypath and University Medical Group and has separate premises in Green Lane. With the University planning to expand student numbers by 5,700 over the next ten years it seems reasonable to infer that some expansion of the University Health Service will be necessary.</p>	<p>whether there is capacity in current practices to expand.</p> <p>Update growth forecast to 2016/17 figures.</p>
<p>Policies C3 (page 115) and C6 (page 117)</p>		<p>Policies C3 (page 77) and C6 (page 78/79) relate to community and health facilities and state that development will not be permitted if it is in the green belt. This is not considered to be sound as the tests in the NPPF should be followed.</p>
<p>4.6.4 Planning Policies and proposals for land use 4.229 page 111</p>	<p>There is no policy relating to the provision of new cultural facilities.</p>	<p>Durham Universities' masterplan identifies the need for the provision of a significant venue for music and drama performance to raise the cultural profile of the University and City, allowing it to make a strong contribution to the arts nationwide.</p> <p>The facility would provide large scale performance and exhibitions spaces as well as facilities for music and drama practice and rehearsals.</p> <p>The University requests that the NPF includes a policy supporting this ambition.</p>
<p>5.2: PROJECTS TO IMPLEMENT PLAN POLICIES</p>		
<p>Reference</p>	<p>Existing text where appropriate</p>	<p>Proposed Action & Comment</p>
<p>Policy Implementation Project 2: Policy D2.3 - Reconversion of Some Houses in Multiple Occupation Back to Family Homes and General Housing page 120</p>	<p>developers of private PBSAs (purpose built student accommodation) and of University colleges donating into a fund, the level of the donation as a proportion of the number of beds in the PBSA/college</p>	<p>Policy does not account for the additional costs involved with developing and operating a college compared to a PBSA. The levy could impact on the viability of DU providing college accommodation.</p> <p>A mechanism to offset costs of providing the additional facilities that make a 'college', including Principal/senior staff accommodation, common rooms, libraries, and running costs should be incorporated.</p> <p>Further, the University provide bursaries to assist qualifying students with their accommodation costs but PBSA don't provide</p>

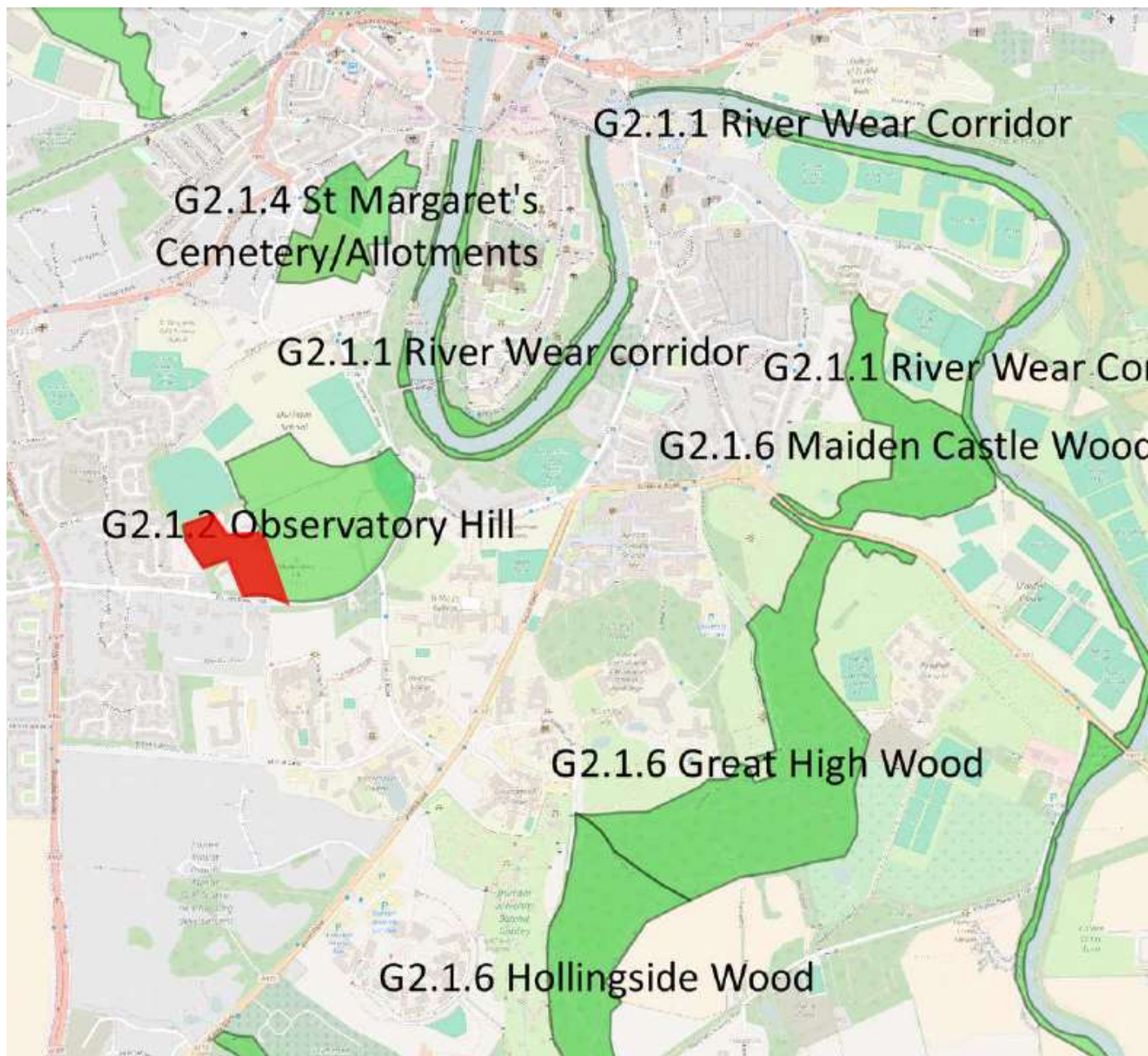
		any 'affordable' (at 80% of market rent) accommodation.
5.3: MONITORING THE PLAN		
Reference	Existing text where appropriate	Proposed Action and Comment
Policy H6: Non-Designated Heritage Assets	Indicate 1: Demolition of Non-Designated Heritage Assets Targets: zero	Amend: "Zero - unless there are circumstances where the benefit clearly outweighs the scale of the loss." In line with NPPF paragraph 135, a balanced judgement will be required having regard to the scale of any loss and the significance of the non-designated heritage asset.

Appendix Table – C1: List of Non-designated Heritage Assets in the Durham City Conservation Area		n.b. Information in the Appendix does not have statutory status.
Reference	Existing text where appropriate	Proposed Action and Comment
Area 2 Framwellgate	Milburngate House	Isn't this currently being demolished? Does this mean the target on page 122 has already failed?
Appendix D - D3: Student Accommodation		n.b. information in the appendix does not have statutory status
Reference	Existing text where appropriate	Proposed Action & Comment
<i>Paragraph 7. The base-line figures for the numbers of University of Durham students - undergraduates and postgraduates, full-time and part-time - are for 2015/16 (in Table 1):</i>	<p>Paragraph 8. Durham University (2016) has published its Estate Masterplan for the development of the University over the decade 2016/17 to 2026/27. This envisages significant expansion by about 4,000 in student numbers but with an accompanying transfer from the Stockton campus to Durham of about 1,700 of whom about 400 already live in Durham. Thus, the net transfer from Stockton is about 1,300 and the total number of students accommodated in Durham would increase from the 2015/16 figure of 15,133 to about 20,500 by 2026/27.</p> <p>Paragraph 9. Further, the University aims to increase the proportion of students living in University accommodation from 42% now to between 50% and 55% in 2026/27. On that basis, there would need to be an increase in University accommodation from the present (2015/16) level of 6,306 beds in Durham to up to 11,275 beds in Durham in 2026/27 i.e. about +5,000 beds.</p> <p>Paragraph 10. The University has planning permission for a new 1,000-bed College at Mount Oswald. It will therefore need to identify sites for up to a further 4,000 beds somewhere in Durham City.</p> <p>Paragraph 11. There were, as of the base date of 2015/16, already built, under construction, approved or proposed PBSAs (purpose built student accommodation) in the wider Durham City for over 4,000 extra bed-spaces. (This number is now over 5,000</p>	<p>Paragraph 8. Update to 2016/17 figures.</p> <p>Paragraph 9. Update to 2016/17 figures.</p> <p>Paragraph 11. Update to 2016/17 figures.</p>

	<p>(Durham City Neighbourhood Planning Forum, Large student residences)). Under current interpretations these do not count as 'living-in' University accommodation and thereby fail to contribute to the University's aim of up to 55% living-in. However, the University is considering entering into partnership arrangements such that at least some PBSAs could be classified as College-affiliated and thereby 'living-in'. In any case, some of the approved or proposed PBSAs are in unsatisfactory locations, and some of the existing PBSAs are not 100% occupied.</p> <p>Paragraph 12. There is, however, an important issue on what students themselves prefer by way of accommodation. First year students must 'live in'. Thereafter, they can choose and the indications from the Geography Department survey (Durham University, Geography Department, 2015) of students' accommodation preferences are that most prefer to 'liveout'. If say 50% of the 5,300 extra students prefer HMOs (houses in multiple occupation) then (at about 5 students per HMO) about 530 existing family houses will be lost, causing the resident population to decline by about 1,000 people.</p>	<p>Paragraph 12.</p> <p>First year students are encouraged but not required to live in college.</p> <p>Speculative and pejorative.</p>
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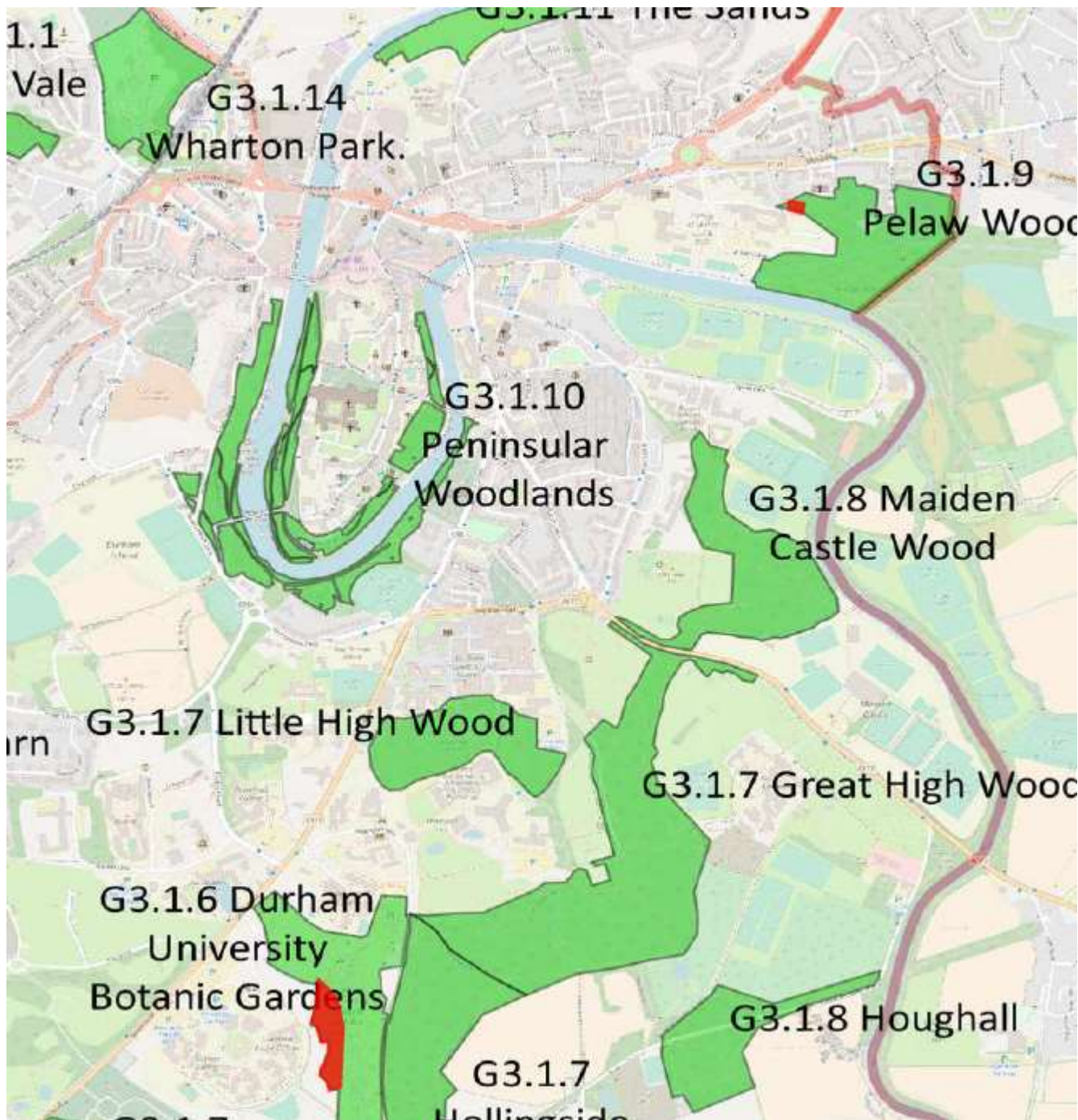
Extract Map 6: Map of Local Green Spaces

Marked in red is land to be deleted from this allocation:



Extract Map 7: Map of Emerald Network.

Marked in red is land to be deleted from this allocation:





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Durham University
Masterplan
Elvet Hill Car Park

1:1250

 Site Area - 9920 m²

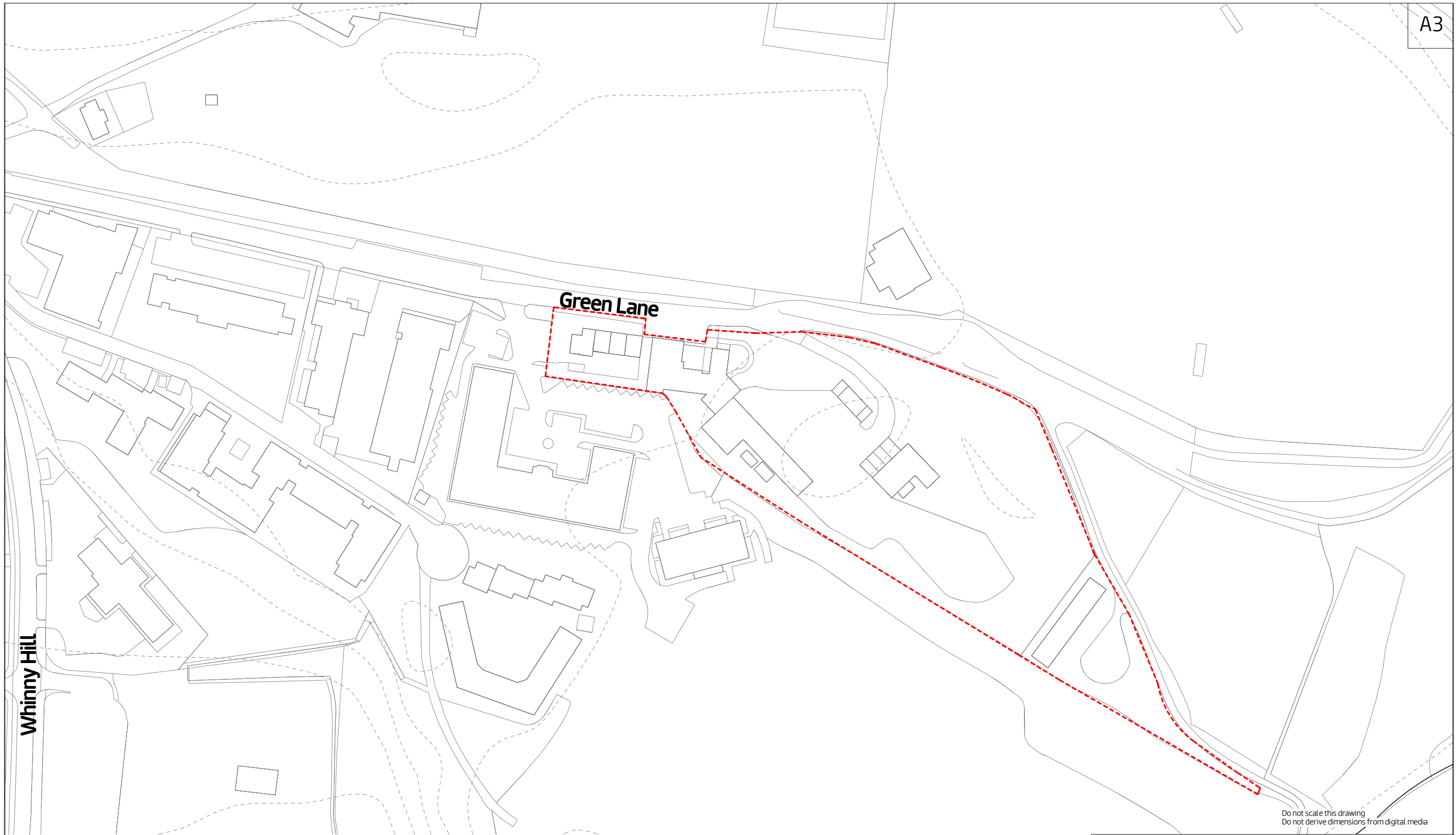
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Durham University Masterplan
Green Lane

1:1250

 Site Area - 12060 m²

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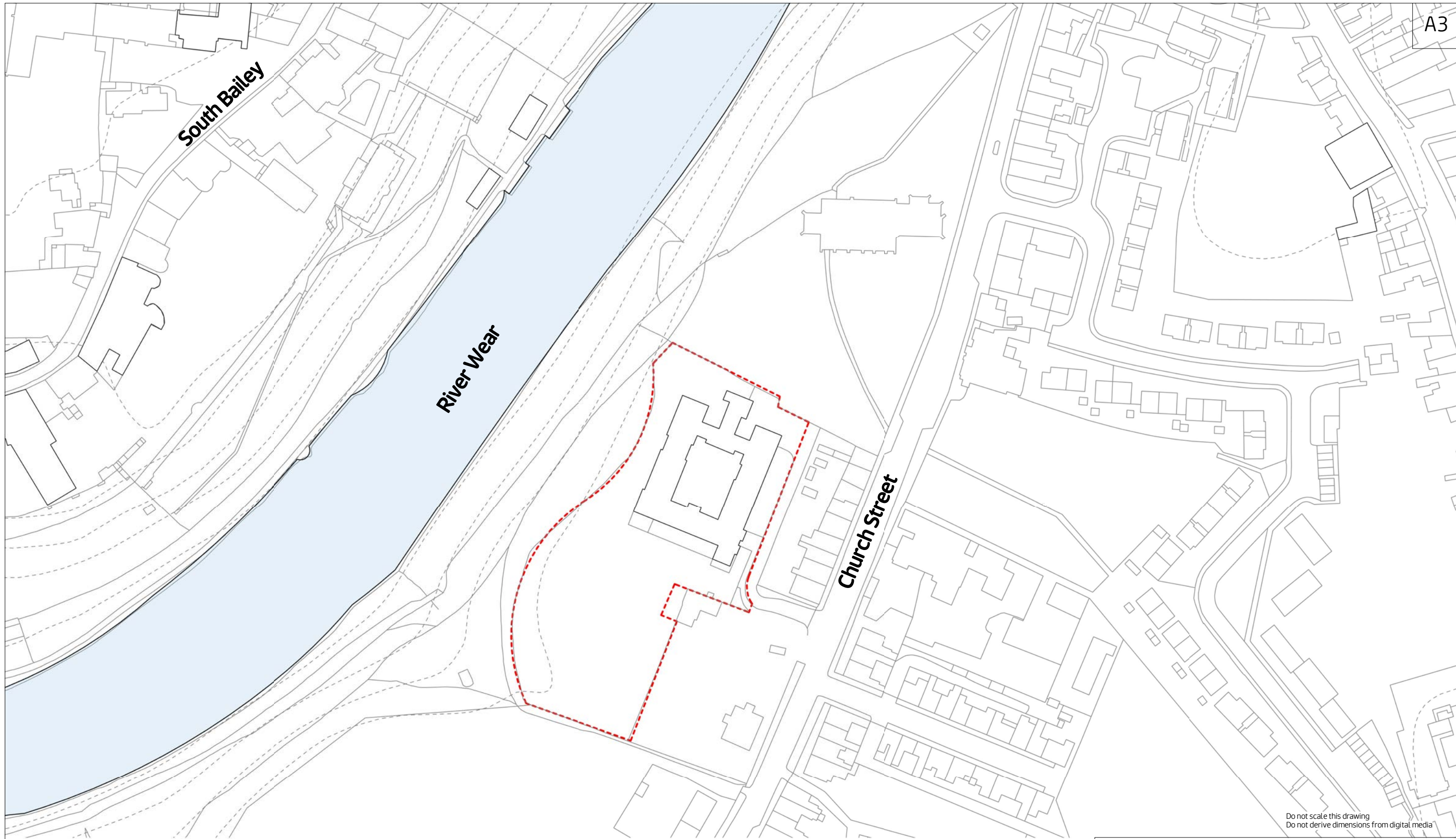
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Durham University Masterplan
James Barber House

1:1250

 Site Area -7060 m²

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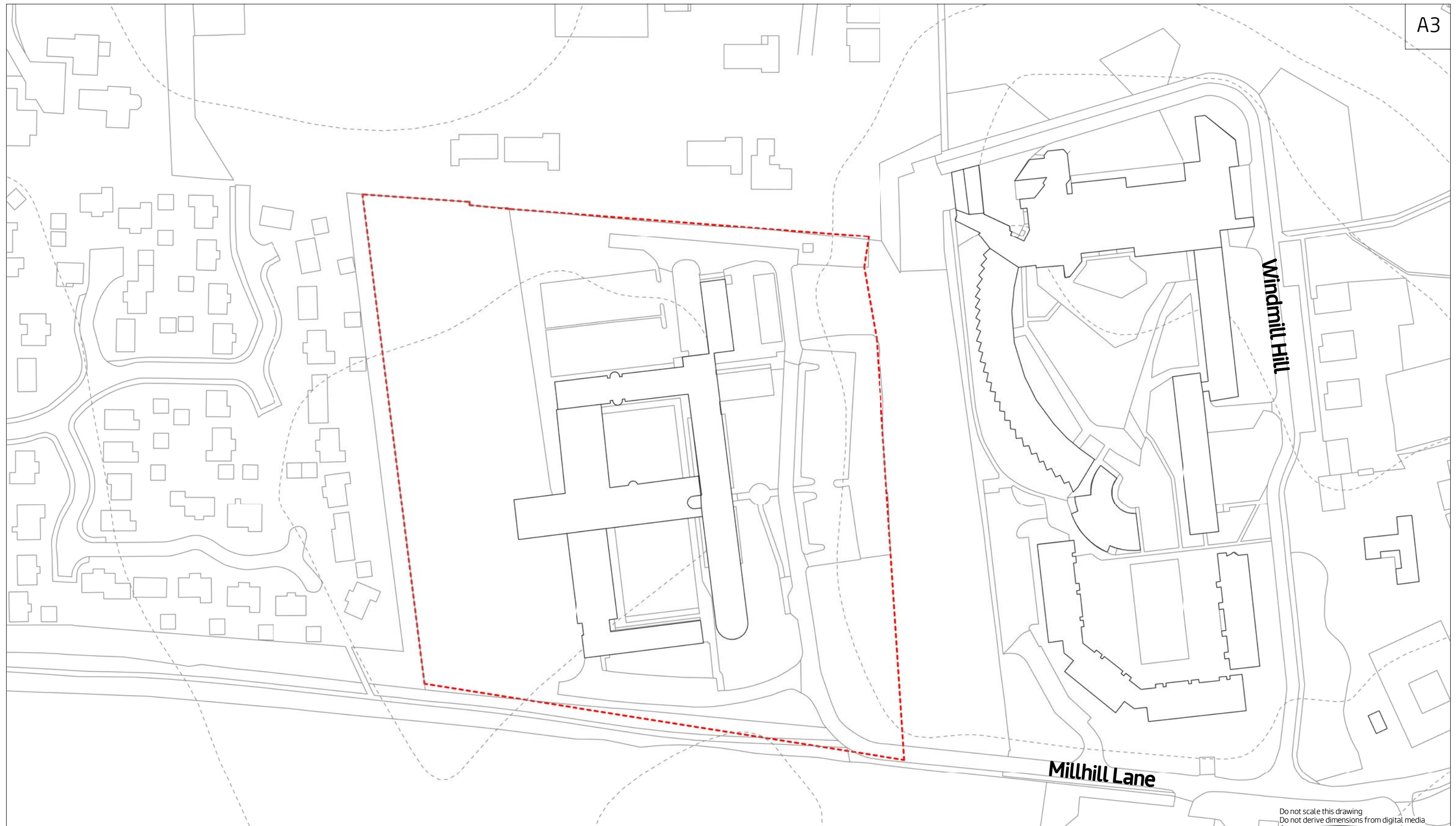
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Durham University Masterplan
Mill Hill Lane
1:1250

 Site Area -29,500 m²

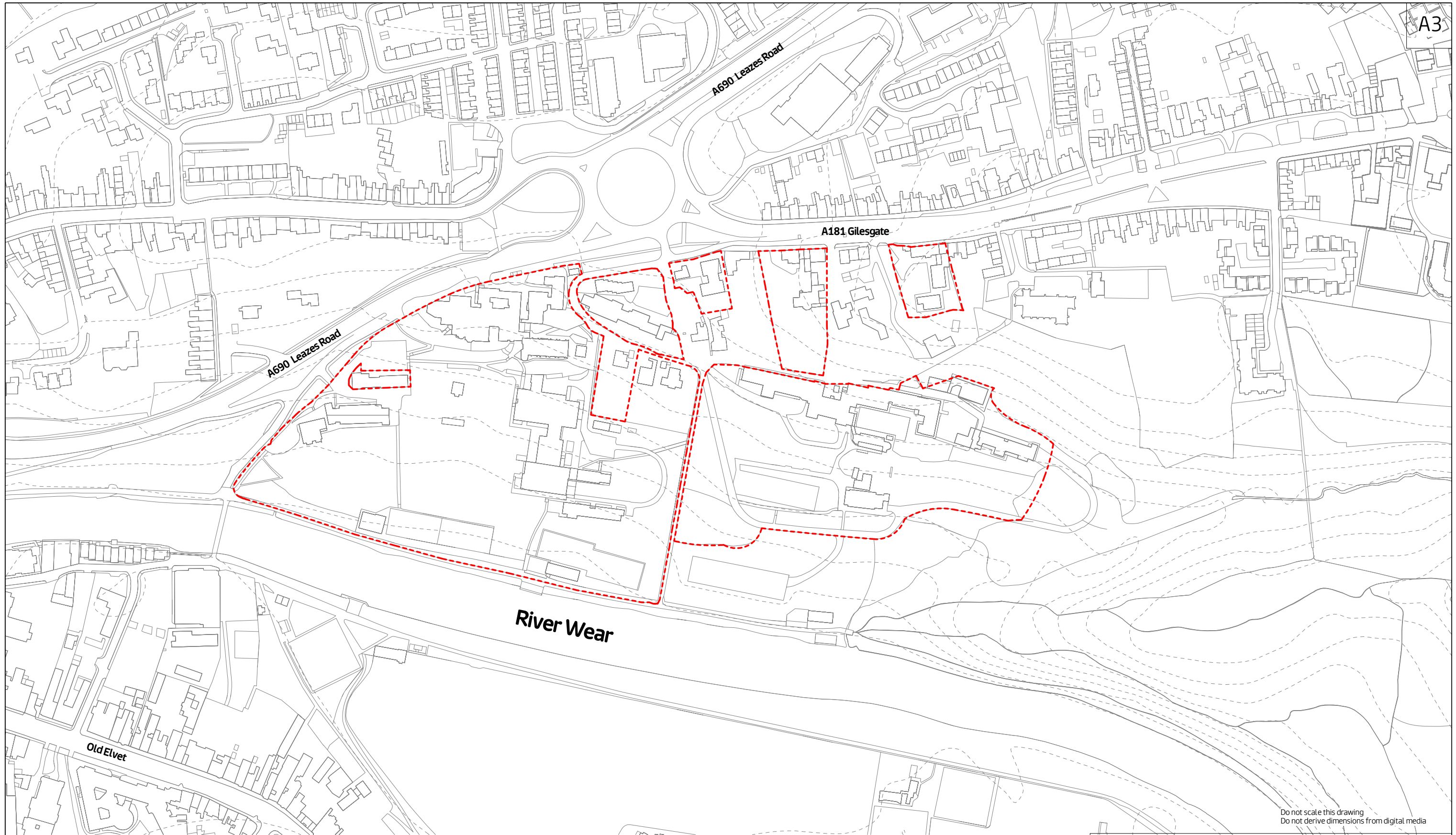
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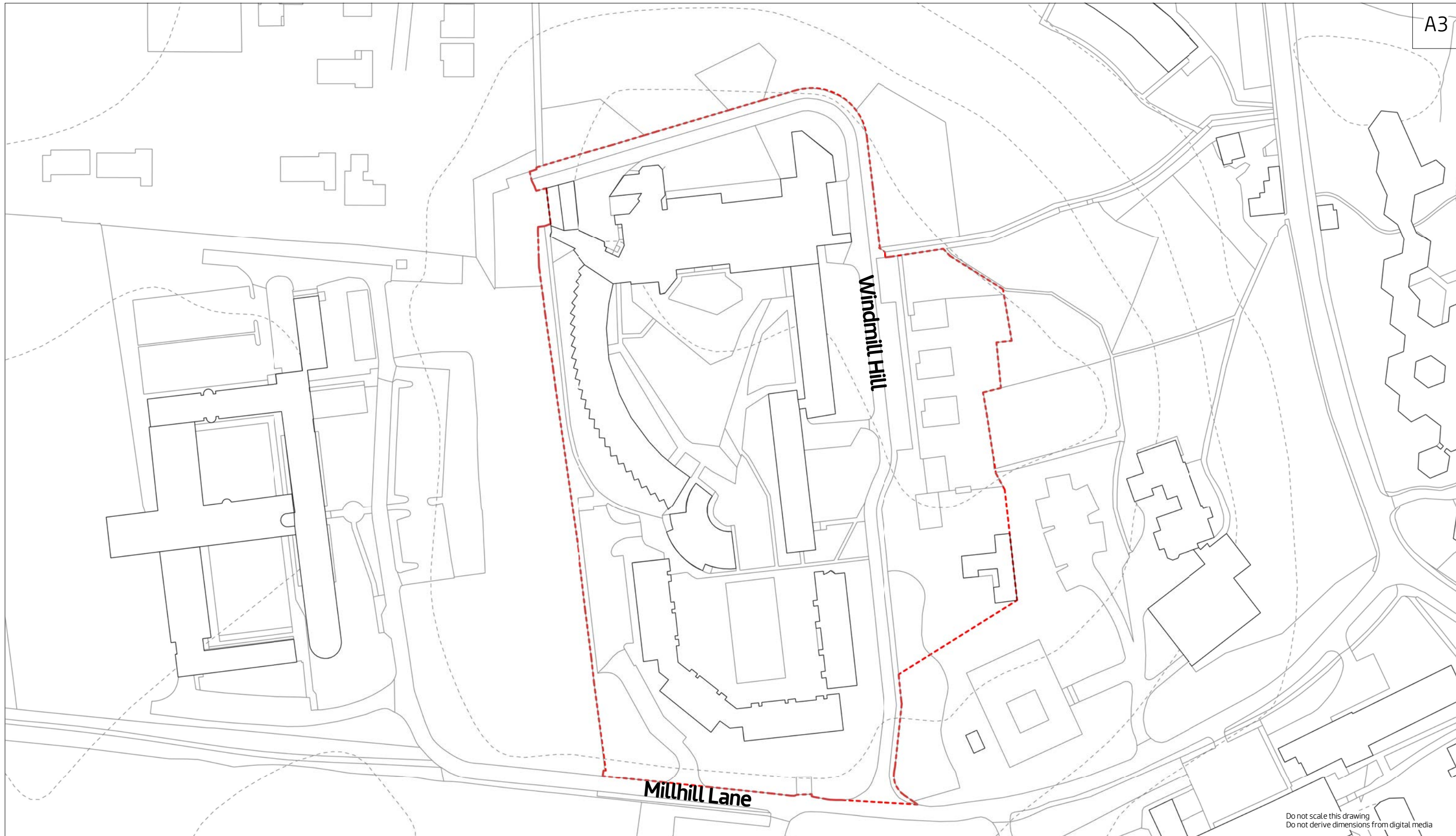
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Durham University
Masterplan Leazes Road
 Site/Infill
 1:2500

 Site Area - 78,079 m²



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Durham University
Masterplan St
Aidan's College/Infill

1:1250

 Site Area - 30,515 m²

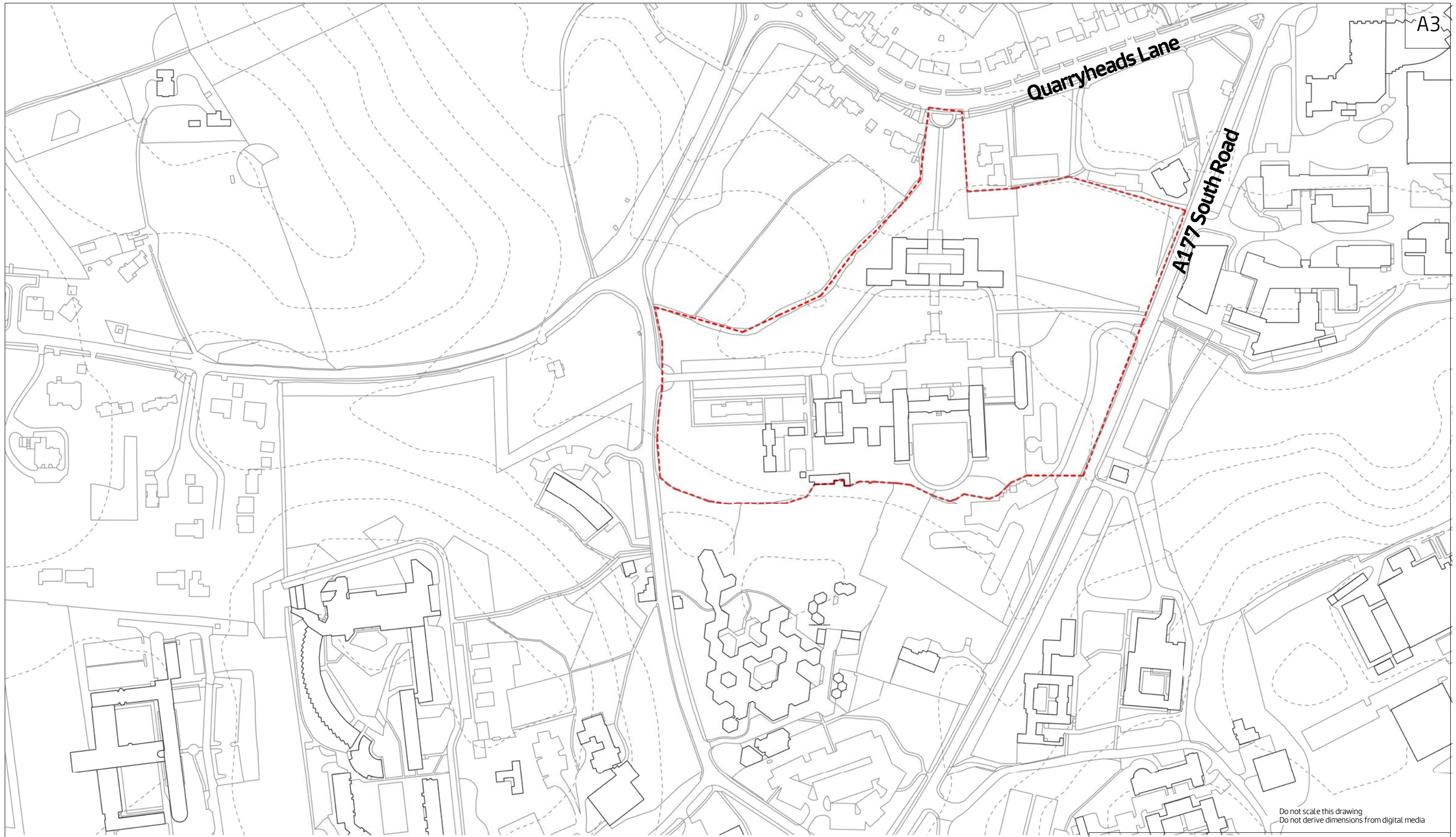
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Durham University Masterplan
St Mary's College/Infill

 Site Area - 57,840 m²

1:2500

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