

**CITY OF DURHAM PARISH COUNCIL  
DURHAM CITY NEIGHBOURHOOD PLAN  
2019 CONSULTATION - ALL COMMENTS**

37 questionnaire comments  
14 Email comments  
7 Web comments

See also 19 letters from organisations and individuals

Note: Personal details have been redacted.

**QUESTIONNAIRE COMMENTS**

Codes:

SEQ = Electronic questionnaire

SQ = Paper questionnaire

**SEQ2**

My main concern with Durham which I consider my home town is the lack of responsible decisions made by the planners. Since the 1960s every nice part of Durham has been demolished to make way for concrete monstrosities which clearly do not fit with mine and your idea of a World Heritage Site of significance and architectural value. Having recently checked out Milburngate Centre it would appear that one ugly shopping centre has been replaced by an equally ugly shopping centre which does nothing for the city centre. There is only one way to deal with Millenium Square, and that is demolition, it is ugly and does not reflect the Medieval, Georgian and Victorian architecture which you so clearly discuss in your documentation. Please take look at the plans for the new University Business School, it looks as though it was inspired by the old Passport Office/Dunelm House. Clearly the architect has never been to Durham. On the opposite bank is Gilesgate and the colleges of St Hild and St Bede. Behind the site is the Old Shire Hall, County Hotel etc, is this not inspiration enough. The High Street is pretty dead, no BHS no M&S, no reason really to shop in Durham. The proposal of using the DLI site as a new arts venue is also pretty stupid. This should include gallery space, exhibition space, family activities etc, this should be in the town centre and attract people into the town, how about utilising the old M&S building. I could go on but Durham is a very sorry shadow of its former vibrant self. Your plans on paper look fantastic, but as noted above, the planners at DCC are pretty useless in deciding what to build. I understand development and expansion is needed, but please do this sympathetically to our city. {Work / run business}

**SEQ3**

I am concerned that the aims with housing development are to protect the rights of young couples and workers who want to move into affordable houses (definitely important) and to stop student accommodation developers from 'winning'. However, nothing has been done to address the overpriced student accommodation as we have little choice but to pay extremely high rents which keep rising as the uni expands because the landlords (many who aren't local) know they can get away with it. {Student DH1}

**SEQ4**

I truly agree with this plan. It is written by those with deep understanding of the City and the many problems that have been allowed to happen. These include excessive student domination which causes huge problems to those still resident here (17,000 students and only 7,000 permanent residents). There needs to be far more control and reduction on student housing, there needs to be far more permanent residents again to give rise to a balanced community and there needs far greater support to independent city retailers and stricter control over the excessive and dominant number of bars, puns, clubs, cafes and late night entertainment. Durham should try harder to restore its history and greenness and become a place to visit for interest and culture not just the

drinking place it has become. Local people need to be listened to and this plan does do that and respond knowingly to what we need. The council plan has hardly changed from the previous submission and is written by those with little sympathy for the City and who are driven by economics above all other quality of life measures. The community needs to be healthy, well balanced and happy. Where are the family houses or accommodation for older persons? All possible sites have been given over to the university and its development. Where are the community spaces and halls and where are places of cultural interest. Why do we have no museum, art gallery or similar? I fully endorse this plan and applaud it for understanding the City and the permanent community and also it's thoughtful long term ideas. {Resident DH1}

### **SEQ6**

Two of my agreements are only partial: G2 because I think there are other local green spaces that might be incorporated into a future version of the plan, and T2, because I would welcome more safeguards against the erosion of small but valuable green areas or patches by parking bays (planning applications for such bays seem to go through on the nod at the moment). However, this may be more of a problem for places beyond the central area of the City. Other thoughts. There is a problem with noise pollution in central Durham. 1. There are too many buskers in the centre, of very varying quality. Durham centre is also a place where people work in offices and, from my room in Elvet Riverside, the long sessions of often bad music coming from Elvet Bridge can sabotage concentration. 2. If you sit in any quiet corner or garden in the city, you will soon hear the aggressive noise of emergency vehicle sirens, if, that is, you are not hearing them already. The racket will continue like a artificial migraine for some time, followed by a period of silence before another one starts up. The vast majority are from the NE Ambulance Service and various FOI requests have suggested that the actual number of medical emergencies per day, either as call-outs or as transfers, is a great deal less (about 5 a day) than the frequent siren use would suggest. Members of the public can also see perfectly well that sirens are also being used when the roads are close to empty. University research work in my room in Elvet Riverside is something I have learnt to keep to a minimum to avoid the hideous fraught noise coming from the main roads to the north. If walking around the city is not to become too much of an ordeal at times (for people on the autism spectrum for example) then action on this gratuitous nuisance must be welcome, if it is possible. Finally, I applaud the work of the PC in doing what it can to make the city a better place for walkers and cyclists. Like many older cities though, Durham has many inherently attractive streets whose appearance is more or less ruined by their having to double as long, thin car parks, even while small areas of grass around the city are eaten into by small parking bays. I know there is a limited amount a parish council can do about this kind of thing, but I welcome all the measures in the Plan that can mitigate the domination of public space by these ugly, dirty and destructive machines. {Resident DH1}

### **SQ1**

Definition of residential unit or HMO with students should be 'a building containing students' rather than defining them by 'exempt from council tax'. {Resident DH1}

### **SQ2**

I disagree with knocking down County Hall and moving council offices to Sands. I think Durham is too small a city for any further developments eg at Ackley Heads. I agree with an enriched community life. Travel could be better - diamond buses are not good - should be Go-Northern buses. {No 'your details' given}

### **SQ3**

Durham is not a cycling city unless cars and motor traffic do not use it - which is incompatible with modern life. Though this can be modified (Park & Ride etc) we must remember undergrads are here for six months of the year and there is very little movement on foot or cycle during the summer term. NB Church Street. There is life - businesses, weddings, deaths, church, community activities which are just as valid as the convenience of students. {Resident}

**SQ4**

How is this to be achieved? We are Dream CIC and very interested in partnering to achieve your aims. email: dreamcharitycommunity@gmail.com Tel: 07895216171 {Work / run business}

**SQ5**

Plans for cycle routes are totally unsuitable. Cycling should not be encouraged in Durham City. Durham is not a cycling city. {Resident DH1}

**SQ6**

Policy D2: more careful assessment of student PBSAs - do they get council tax exemption - they are huge businesses. Policy D3: Make sure all houses occupied by 3+ students are counted; some landlords may pay council tax. {Resident DH1}

**SQ7**

It would be hard to disagree with any of these policies. {Resident DH1}

**SQ8**

I agree with everything in this plan. I hope the council pays attention to it, before any more inappropriate developments spoil our city. {Resident}

**SQ9**

{Parts copied to Themes 2a, 2b,3}

Protect historic Durham buildings and all wildlife. Keep Durham tidy and crime free. {Visitor DH9}

**SQ10**

Policy G3: and better signage so people use it more. Policy E1: I think the development of Aykley Heads as a business park does make sense. Policy E3. + {plus} strong policies to deter more edge of town retail. Policy D2: Not at all sure there is proven demand for more PBSAs!

I generally like the emphasis in the Plan on good stewardship of the city. I do wonder if this - or indeed the eventual County Plan - really takes into account the climate emergency. Personally, I'd be happy to see PV panels on roofs and turbines where they can be accommodated. {Resident DH1}

**SQ13**

Need to think about planning of services in relation to student number growth and needs of students at service level. Need to think about safety of night time economy. Policy D2/D3: Important to think about cost & quality of both permanent resident and student accommodation (HMOs, PBSAs). If limiting growth of PBSA supply need to think about other ? on cost, quality. {Resident, work/run business DH1}

**SQ14**

D2: No more PB student accommodation if we want to keep a balanced community. D5: with covenants preventing affordables becoming HMO/student rentals. E4: Already too much 'evening' economy & its dire consequences for families & impact on Council cleaning teams. S1: insist on solar panels on new builds. {Resident DH1}

**SQ15**

Given the growth in student numbers, the plan seems designed to prevent rather than supporting direct demand in the City; we'd prefer a plan which addressed the reality rather than divert it. This is a complex issue with interdependencies that it would be good to acknowledge. Strong support for C4, T1, C1. Broad concerns across D, Housing policies. {Work / run business DH1}

**SQ16**

Safety in City if night time economy expanding needs to be acknowledged. Accessibility in Durham City centre needs to be given more attention, e.g. no disabled toilets after hours. Policy C4 -

growing student population requires more GPs - already lack of appointments. Plan needs to show more acknowledgement & tackling issue of University strategic/master plan. {Work / run business & student DH1}

**SQ17**

Very inspirational!! How realistic though?? Where is the drive & determination. Don't let party politics SPOIL everything. Put PEOPLE, PLACE AND COMMUNITY FIRST!! Business must thrive too. {Resident DH1}

**SQ18**

On D5: It is important for new housing built with the City & designed to improve the mix of residents, to be covenanted. Out development (Byland Close, off Laburnum Avenue) was great when we all moved in - a mix of working-aged / retired / lower-income / single people & (small) families - but the original purchaser have often sold to landlords, and the inevitable (?) is happening. {Resident & student DH1}

**SQ19**

It is reprehensible that durham county council have obstructed this plan. It should have been in place much earlier. {Resident}

**SQ20**

E3: Not seen. E5: Not seen. T2: Not clear. C1: Not clear. C4: Not clear. {Resident DH1}

**SQ21**

Durham used to have well-regarded planning processes and outcomes, which seem to have been lost, to the obvious detriment of the City and its residents and visitors. Can we have back planning in the public interest, please, that benefits the "users" not the developers. {Resident DH1}

**SQ22**

Don't sell off Durham to students  
{Visits DH9 nearly all disagree}

**SQ23**

2a Policy H1: This has not proved successful up to now. It would appear no thought on the part of the planners has been given to the W.H.S. landscape setting. 3. E4. No more bars! 4 D6. All new housing to contain solar panels. 5 T1. No cycling in City centre. All cyclists to obey highway code. {Resident DH1}

**SQ24**

Thank you for your time & efforts in working on the plan. It's a huge step forward. Maybe should include working towards clean air in the City Centre & reduction of heavy traffic. Perhaps a weight restriction could be a target!? Many places do this. {Resident DH1}

**SQ25**

Policy H2 "should be avoided" should be prevented. D1: Agree on the bases the dwellings do not become HMOs. Theme 3: The dependence on the University as a major part of the economy must be addressed. Investment needs to be made to encourage a balanced more harmonious County that benefits residents. The City is increasingly becoming a campus and affordable housing a rarity for young professionals. Policy D5: 20% is not enough. {Resident}

**SQ26**

Policy E2: Providence Row: development here should be reserved for education use connected with the 6th Form Centre. Policy D1: could be stronger in promoting residential development. Policy D2: should be stronger in resisting P.B.S.A. Policy T2: complex wording is confusing. Otherwise a remarkably good Neighbourhood Plan. {Resident DH1}

**SQ27**

Policy D3: It is essential that the council adheres strictly to the 10% limit and does not allow any new HMOs above this, particularly in areas like mine that already far exceed the limit. Otherwise

there will never be any change. Too many opportunities have been missed in the past that could have redressed the balance. Also, when an HMO is sold, the new owner should have to re-apply for a licence. {Resident DH1}

### **SQ28**

E2/E6 - The focus should be on providing non-student residential accommodation not retail opportunities. D2 - These requirements aren't enough, PBSAs should only be approved if there is not a need for non-student residential accommodation, or Any development proposals should include non-student accommodation (a minimum of 50%). D5 - The required percentage is too low: it should be at least 40%. {Resident DH1}

### **SQ29**

This is a good plan. But I think 20% affordable housing is too low. I wish we had more walking & cycling & less cars. You can taste the pollution around Church Street on week days. {Resident DH1}

### **SQ30**

Whilst the need for conservation is recognised and accepted, the Policies as drafted do not adopt an approach which is proportionate to the level of impact as required by the NPPF. Please see the accompanying representations for further details and suggested Policy amendments. {see L9}

### **SQ31**

Need to reclaim the city for the benefit of the local population and bring families back to the city. {resident DH1}

### **SQ32**

Approve of almost every issue here especially policies D3, D4 and D5. Not too eager on visitor attractions when they interfere with regular city events like market. Also have reservations on E1 & E2 as Durham is really a small city and this aspect of development should not be allowed to dominate. Policy D3 I agree strongly. Policy E2 I partially agree Query. {resident DH1}

### **SQ33**

See L4

### **SEQ7**

I welcome this opportunity to comment on the Plan and am going to make a longer comment about Policies D2-5, either by emailing a letter or by going back into the website to find an online opportunity. {resident, work/run business, DH1}

### **SEQ8**

We MUST protect and continue to enhance our beautiful city and not allow it to be destroyed and become like any other city in the UK. It is unique in it's heritage and this must be protected at all costs. Affordable housing is being sadly neglected, as an important issue and should be addressed quickly. Whilst progress rolls on, the developers need to reigned in and attention brought back to the needs of the city's residents and not only it's student population. This Neighbourhood Plan, outlines all these issues and I feel should be warmly accepted for it's invaluable contents. {resident, DH1}

## **EMAIL COMMENTS**

Code:

SEM = Email

### **SEM1**

I believe that a robust policy is needed for the HMP Durham Site as I believe that it will soon be surplus to use or beyond repair.

I would encourage residential development above retail with the exception of above A4 and A5 use classes.

I would defend the protection of public amenity open space (eg Mount Oswald Golf Course) but would seek liberalisation of building in the green belt - green belt policy seems to have been written by home owners to prevent others getting on the property ladder. For Durham to thrive we need more industry and more housing to do so we need to build up or out

Redundant retail on edges of business district to allow conversion to Residential use

## **SEM2**

Hi thank you for posting consultation draft.

The first thing that strikes me before beginning to read it is that you are placing the onus on residents to travel purposely to pick up a copy of the questionnaire at key locations.

We are being encouraged to engage and yet at the first post to do so the responsibility is placed on residents to do so. Some are more able than others to do so. If the parish council were serious about resident public engagement and wish to encourage it I would like to ask why the questionnaire cannot be posted out to all residents please.

I'm in favour of Parish council as it gives more power to residents and opens up simpler channels of communication yet appears to have stumbled at the first post.

Please could you say why a questionnaire has not been posted out if the Parish Council are indeed carrying out a desire to engage as many people as possible?

A second question please. How did you collate residents of the Parish Council's opinions before making decisions as I don't recall being asked for my comments prior to the draft.

I will comment on the plan once I've read it but felt the need to comment on the questionnaire because I truly hope Durham City has a council who wish to engage with their residents frequently. It was marketed as one of the advantages in having such small, local councils.

I will purposely make a trip to one of the locations to pick one up and complete. Others may not be able to do so or they may not have access to a computer.

**Note:** Email correspondence explaining access routes to the draft plan and previous consultations held

## **SEM3**

Thank you for putting together the NPF proposal, which I assume aligns with the County Plan and latest planning guidance. It is a useful review of the City planning and economic environment, however, it would be very useful to identify where the gaps lie between the current County guidance and this. I assume that this has been collated to address specific issues that are not covered by the County guidance.

I have some specific comments in relation to recent events:

1. Does the Parish intend to review its proposals in light of the Council's declaration of Climate Emergency?
2. It would be very useful to gain some feeling for the long term trends in economic growth within the Neighbourhood over the past 20-30 years. I suspect there has been a decline in the economy of the city, visitor footfall, as well as the resident population. I have concerns around the term sustainable growth as growth is not a sustainable concept and, if we are already in decline, then economic stability may be a better aspiration. What could be the population and economic climate required for a long term sustainable city? My experience of the new student developments is that they primarily shop on line, so provide no benefit to the surrounding retail offer (a notable case being the now closed Newsagent on Neville's Cross Bank), more needs to be done to promote shopping locally. I am also aware that many students and visitors appreciate the "Harry Potter" history of the city and not simply the cathedral heritage. There is very little made of this, but

you only need to spend time at King's Cross Station to see how much could be made from his popularity.

3. I note your proposals to safeguard the heritage and green areas within the city, however, there is a real need for public realm improvement, particularly around the Passport Office/Freeman's Reach areas. Does the Parish intend to use any of its powers to address these eyesores? The mess left following the construction of the Passport Office has not been hidden by the silver heron.

4. Further, there are plans included showing the areas identified for commercial and industry such as Aykley Heads, however, there does not appear to be any discussion around how these new areas of footfall can be linked to the existing city and retail offers to boost the economy. How can we maximise the benefit of the Aykley Heads development to the city economy? How will the additional traffic be managed?

5. I note there is reference to climate change, and the need for energy efficiency, but little mention of the practical infrastructure that will be required to support this transition to low carbon. There will be a need for electrical charging infrastructure and heat networks to be installed, and there should be an explicit requirement for every new building to have photovoltaic cells and designed for low/zero carbon heating sources. This needs to be strengthened within all County Plans.

6. Lastly, a big bug bear of mine is the lack of amenity for children within the city centre. A neighbourhood plan should support the needs of all ages within the community and there is nothing for children to do in Durham, this is a big business opportunity for the city and should also attract visitors and families from outside of the city. Cinemas are not the only form of family entertainment! It would be lovely to see our teenagers catered for and provided with something positive within the city.

Many thanks for all of your time in collating the plan and attempting to support the sustainability of the city. I hope some of the above comments make sense.

#### **SEM4**

Thank you for consulting the Environment Agency on the Draft Neighbourhood plan. Having assessed the documents I can advise that we support the plan and policies and have attached a formal response letter.

#### **SEM5**

It is good to see the emphasis within the plan on sustainable transport, and the identification of areas for improvement. The map of cycling provision in Appendix D is particularly instructive, though it is unclear how the information contained within it will be used to guide the improvement of provision.

I would suggest that indicator of change number 13 in Chapter 5, "Achievement of a high level of access by all modes of sustainable transport", could be improved as a measure of success: would it be more appropriate to aspire to a higher level of use of all modes of sustainable transport? If the provision of access does not translate to an increase in use, then this could indicate that the level of provision remains inadequate, or that the resources deployed in providing the provision could have been better used.

**Note:** Correspondence re difficulties accessing website

#### **SEM6**

Livin {Livin Housing Limited} has considered your letter regarding the development of a neighbourhood plan and currently we do not have any stock nor plans for stock within the Parish boundary.

We thank you for the opportunity to comment and wish you well going forward with the plan.

#### **SEM7**

Re: Housing sites D1.5 and D1.6 and objection to their non-allocation in policy D1.

**Note:** Correspondence re these sites and how they are provisionally covered in the Neighbourhood Plan



Thanks for your clarification. The exclusion came as a bit of a shock because I wasn't aware of the allocation criteria. The obstacle is obviously one of deliverability rather than sustainability. FRA issues have already been addressed so we probably need to have another chat with {DCC} about the car park. To be realistic this isn't going to be straightforward because of the upcoming car parking problems the city is going to experience city-wide so we are grateful for your provisional acknowledgement of the sites in the plan.

At the outset of our interest in the area – XX as a resident and myself as the owner of a business there – there has been widespread consensus that this part of Durham is neglected, with unrealised potential, mainly due to the presence of the substation. It would be nice to think it can be resolved in my lifetime!

**Note:** Correspondence re these sites and how they are covered in the Neighbourhood Plan

**SEM8** (not used)

### **SEM9**

I apologise immediately if this method of commenting on the Draft Plan does not fit your expectations of how such comments would be structured, but I confess that I found the "box-ticking" approach of the electronic questionnaire somewhat restrictive with, apparently, no opportunity to expand or clarify the choices.

In any case I wished to confine comments to a fairly small number of topics and I trust that you will be able to "cut and paste" these into the appropriate sections in drawing results together.

#### ***Housing for Older People.***

It may prove impossible, but proposals for age-related housing developments should be on relatively flat sites, with good access to local services of all kinds. We cannot alter the unfortunate topography of the City, with all its gradients, but should not compound the difficulties for Older People by positioning such housing at the top of steep banks. Perhaps some of the existing streets of HMOs might usefully be compulsorily purchased and returned to normal family living with an emphasis on the older population?

As an associated issue, the ban on further HMOs should be rigidly enforced, with support for rigorous surveys to expose exactly how houses are being used, to avoid the existing classifications being corrupted or misused. Minimum standards on student room sizes and facilities in such houses are required where they do not already exist. Places on University Campuses should be the preferred accommodation solution for students - not just the suggested 50% - which is clearly inadequate.

#### ***The Night-Time Economy***

The tendency to favour such developments should be reversed - and quickly - before the City centre is denuded of all but bars and clubs. Retail has been subverted and this is having a negative impact on residents - who seem to feature only marginally in planning considerations. The health-related arguments against alcohol are powerful and should be heeded.

#### ***The push towards cycling as an activity***

This enthusiasm should also be halted to ensure that such a dangerous and pedestrian-unfriendly pursuit is confined to formal velodromes and cycle tracks. Cycling races and festivals in the City should be banned. One does not dispute the potential health benefits of cycling, but locally streets are rendered dangerous for the older population and there might usefully be a move to ensure that cyclists push their machines through the City, rather than riding them.

#### ***Retail offering***

While the City cannot be immune to wider pressures on the way in which people shop it must be recalled that not everyone has access to personal transport, or finds it easy or acceptable to use out of town shopping centres. The lesson already exists locally in the serious damage caused to Bishop Auckland town centre through the rapid and considerable development of out-of-town shopping facilities.

A revised car parking policy to encourage local people to shop locally would be of help.

The new development of the Prince Bishops shopping centre - Riverwalk - was sold partly on the idea of additional retail provision. This does not seem to have materialised and new space seems to be confined to food and entertainment outlets. What happened to the promised shops?

### **University developments**

Consideration of the further planned developments should ensure that the views of the World Heritage Site enjoyed by existing residents are not destroyed or damaged by inappropriate or excessively tall buildings - this has already happened with Riverwalk and should not be repeated with Milburngate or Elvet Riverside under any circumstances.

### **Conservation areas**

The restrictive approaches taken by the planners have already prevented the use of "greener" approaches in respect of local buildings - a difficult balance to strike, of course, but one cannot have both. Reference to this dilemma might usefully be made in respect of such items as the use of UPVC windows and the introduction of roof solar panels - while at the same time the University is enabled to create Stalinist barracks in sensitive areas. The poor state of Kingsgate Bridge is a prime example of the neglect of maintenance in a key location and does not bode well for the future appearance of the University Estate.

### **Strategic Policies**

Further information as to WHY such policies would be deleted needs to be included in the Plan.

### **SEM10**

#### **Network Rail**

Thank you for consulting Network Rail on the proposed Durham City Neighbourhood Plan, we made representations on the plan in 2017 and are comments on this draft plan remain the same. We would ask that you take due consideration of these.

Whilst there is mention of the railway there are no specific policy features regarding the railway.

As you will be aware there is high demand at Durham station for car parking. As such there are aspirations to provide additional car parking at Durham station through the double stacking of the station car park.

We would welcome the inclusion in policy T1 -Sustainable transport accessibility and design, for the support of additional car parking at Durham station to aid the use of rail travel which supports the aims of policy T1 for the use of sustainable transport. This will benefit residents of the Durham City itself and the wider community who rely on Durham Station to access the east coast mainline.

### **SEM11**

I would like to thank you for your work on the Neighbourhood Plan, particularly as I guess most, if not all of it, was carried out unpaid and took up hours of your time. Apologies not being to comment on every item as it is very time-consuming, as I'm sure you know only too well.

I particularly welcome the opportunity to comment on housing policy, following a frustrating moment in April 2019 when the Spatial Policy Team in Durham County Council told me that my one chance to comment on the Interim Policy on Student Accommodation had been during the consultation on the County Durham Plan (which closed in March 2019). Failing that I had to wait for another 10 years, or 5 years if the County Durham Plan had a mid-term review. I was not told that the Neighbourhood Plan could provide another opportunity.

When I comment to you I feel that my comments are valued and given careful consideration, even if they touch on issues that are beyond your remit, and that you do not say 'it is what is' and 'nowt to be done'. Your approach is an example of the trust-building approach that the Raynsford Review of Planning concluded is urgently needed in the UK. I must emphasize that I am not anti-planners, as I recognise that they are in a difficult position trying to balance the interests of different stakeholders whilst constrained by planning law, and whatever they do, someone will always complain.

But, sadly, my sympathy has been eroded following Durham County Council's East and Central planning committee's decision to approve the conversion of the Corner House from a C3 to a C4 property, even though both the officers and councilors had been presented with credible evidence (by residents, the Neville's Cross Community Association and the Parish Council) that their figure of 8.8% of HMO accommodation within 100 metres of the property might be inaccurate. They acknowledged the risk of inaccuracy, but nether put their decision on hold in order to seek out

further information, nor said 'we need to improve our methodology'. That is not good decision-making.

Since then I have been reading planning applications on Durham County Council's planning website, and am struck by the repeated failure of ordinary residents to have their views taken into full and proper consideration in decision-making. Whinney Hill residents are a particularly painful example - they appear to be up against the unspoken but very powerful assumption that it's inevitable that their housing estate (and whole swathes of the city centre) will be taken over by landlords renting to transient students, and that's the way it is, tough.

So thank you Neighbourhood Plan for trying to develop a different and more progressive vision of Durham that benefits us all - I salute you!

See also: SWC2 to SWC5

### **SEM12**

Dear Neighbourhood Plan

When I emailed you my comments last week I neglected two issues.

One is my support for your emphasis in T1 on prioritising pedestrians, cyclists and public transport users. I endorse all initiatives to enable safer cycling in Durham City. I and other cyclists often use Clay Lane and the path/cycle route from the A167 to the Business School along the side of the old golf course, and feel much safer on these routes than on, for instance, Potters Bank. I would like Clay Lane to be designated as a joint cycle/footpath similar to the old golf course footpath. Secondly, I fully support all efforts in G2 to retain Observatory Hill and the the field around Observatory House/the Observatory as protected green spaces. If you were able to count the number of people who use both areas for dog-walking/access/pleasure daily, you would see how important they are to local residents. When the field was ploughed a few years ago it was fascinating to see how many people walked back and forward across it, even though it was muddy, in order to re-create the original 'lines of desire' paths. I also support the protection of the Battle of Neville's Cross sites.

Many thanks and best wishes

See also SWC2 to SWC5, SEM11

### **SEM13**

Thank you to all involved in developing the plan and for putting in the hard work.

I feel there is much to commend.

I feel we do need to ensure a move towards healthier streets for the City and more support for pedestrians and cycling

I would hope that we can build on the excellent principles contained in the plan to ensure that cycling and walking are both encouraged throughout the City and notably on off road paths such as the riverbanks, Clay Lane, Mill Hill road and possibly Silver Street /Framwellgate bridge.

Yours sincerely

### **SEM14**

Code not used

### **SEM15**

This is my formal response: I've shared this with the Economy Theme convenor.

The wording of the Economy policies (Theme 3) lack the words 'and' / 'or' (as applicable) linking the listed criteria.

### **SEM16**

#### **Forewords**

The Neighbourhood Plan is exemplary in its procedures and content. It deserves to be welcomed by the public, local groups and organisations and the County Council. In pursuit of that, perhaps it could be accompanied by a short further statement signed by supporting groups and organisations to demonstrate its widespread approval and relevance and their part in the preparation of the Plan.

#### **The Climate Crisis and the Neighbourhood Plan**

Recent and growing concern about the climate crisis and the need for rapid transition to a low carbon economy suggests that neighbourhood plans will increasingly be judged by their effectiveness in these matters. Our Plan has been successful in doing this, but could benefit from more direct evidence that it is formative part of the development of the Plan.

Here are some suggestions for changes in presentation to bring these concerns into a clearer focus.

**Challenges** – Global, regional and local. This section could be restructured to show that these challenges that Durham faces are wide and serious and have been factored into the strategy, policy and resilience of the Plan. The challenges could be expressed as:

1. The climate crisis. (At present, para. 2.10 only highlights the need to avoid development in the local flood plain rather than an existential challenge posed by climate change to be addressed within the Plan. This would relate directly to sustainability policyS1 as the Plan's response to this threat).

2. A low carbon economy. (The challenge is to address the weakness of the local economy in part caused by the continual drain of resources in particular young people, skills and talent to London and the South East. The solution (which is first referred to in Figure 1) should be presented here ie innovation to create a low carbon economy by encouraging green jobs, technological innovation and green tourism) .

There are three other challenges already covered. Perhaps we should be clearer that there are 5(?) challenges rather than the rather unstructured chapter we currently have.

3. The growth of the University in an historic city. (The control of accelerating growth of the the University in a City incapable of accommodating the impact with consequences for the availability of affordable housing, the viability of shopping, and community cohesion. Durham City has the highest ratio of students to permanent residents in the UK could be mentioned.)

4. The City as a focus for growth in the County. (Pressure for general development in and adjacent to a beautiful and historic city, and the consequences for its World Heritage Site and its setting.)

5. Improve to benefit the lives of residents, employees and its visitors in terms of diversity, choice, and fairness.

**Figure 1 – Key Resource Sustainability Issues.**

Figure 1 could be slightly reconfigured to become 'The Climate Crisis and the Neighbourhood Plan' while still referring to the key resource sustainability issues. Somewhere, a direct reference to permeable pavement systems to reduce the probability of local flooding could be added.

**Policy S1: S.D. Requirements**

Looking at i) and j) again SUDS should be more about permeable pavement surfaces to avoid local flooding than water quality etc which is covered again in i) (perhaps it referred to directly because it is ignored so often in new development)

**Policy S2; The Requirement for Master Plans**

The master plans are the main opportunity to encourage exemplary development and should therefore include the test of contributing to the creation of a low carbon economy

**Theme 2b: A Beautiful and Historic City – Green Infrastructure**

Possibly a mention in the vision or the objectives of meeting the challenge of climate change?

**Theme 3: A City with a Diverse and Resilient Economy**

Perhaps inclusion of reference to a low carbon economy and eco- tourism in the objectives and a para on what this means in the context section?

**Theme 4: A City with Attractive and Affordable Places to live**

Policy D6 should perhaps refer somewhere to 'a new generation of housing built on ecological principles in response to the climate crisis' ?

**Theme 5: A City with a Modern and Sustainable Transport Infrastructure**

Already refers to a low carbon future in the vision. Just a check on whether this has been followed through as far as it can be in the context that follows ie transport is probably the most important of all means on the transition to a low carbon economy

**Chapter 5: Monitoring the Plan**

Para 5.3 should perhaps extend the 3rd bullet point to read ' the sustainability principles within new development has (sic) been effectively applied within the context of adaptation and mitigation of climate change and the transition towards a low carbon economy'

## **WEB COMMENTS**

Code:

SWC = Web comment

### **SWC1**

New comment on your post "Theme 2(b): A Beautiful and Historic City - Green Infrastructure"  
As part of the healthy lifestyle there should be a policy of extending the cycle network across the neighbourhood and also amend the current cycle network to make it safe and cohesive.

### **SWC2**

New comment on your post "Policy D2"

I welcome Policy D3 and in particular section (e) as under the current Interim Policy on Student Accommodation PBSAs are not counted when assessments are made about the percentage of student accommodation/HMOs in a postcode area/within 100 metres of a new PBSA development or the conversion of a C3 home to a C4 HMO.

I question the strength of the word 'appropriate' in (g), (h) and (i), as recently-built student accommodation, such as the new accommodation blocks at Van Mildert College, lacks the careful and creative design of earlier accommodation blocks, such as the hexagonal style blocks surrounded by trees in Trevelyan College. The new blocks at Van Mildert may be 'appropriate', but are higher and more densely packed than earlier equivalents, and this trend is mirrored across various new PBSA developments in Durham. I am concerned that 'appropriate' is an overly elastic term that will be used to justify any overly tall and overly jam-packed off-the-shelf building, be it built by Durham University or by private PBSA developers.

Regarding (j) I am concerned that 'PBSA Management Plan' sounds good on paper but is less effective in practice, as neither Durham University nor Durham County Council/Durham Parish Council have much control over the operations of private PBSA businesses, and they also appear (from anecdotal evidence and inspection of staff lists on their websites) to have very few enforcement officers.

I welcome the references to 'affordable' and 're-purposing' in the bottom three paragraphs, and live in hope that they will not become elastic words stretched to mean something different from the original intention.

### **SWC3**

New comment on your post "Policy D5"

I welcome D5, and 4.197 and 4.198, and the ways in which you envisage the reversion of HMOs to affordable homes.

### **SWC4**

New comment on your post "Policy D3"

I welcome Policy D3 (apologies for using D3 in my earlier comment on D2 which should have had D2 in the text not D3) as it tightens up the Interim Policy on Student Accommodation.

I welcome the inclusion of 'new-build HMOs' and 'extensions' in the first paragraph as perusal of Durham County Council planning website shows that there has been an increase in the number of approvals for expansions of small terraced houses in eg: the Viaduct area from 3 to 5,6 and even 7 bed houses, and also an increase in applications to turn any empty bit of land into a money-making HMO.

In (a) I welcome the addition of the words 'including the proposed development' as currently the Interim Policy only seems to cover existing C4 houses eg: when the Corner House was given C3 to C4 permission on 15.5.2019 the (disputed) 8.8% figure did not include the Corner House itself.

In (a) I welcome the addition of the words 'including those in Purpose Built Student Accommodation' as currently the Interim Policy only covers C4 houses eg: when 45 Dalton Crescent was given C4 conversion permission on 16.2.2017 and 56 Dalton Crescent on 13.7.2017, the existence of the neighbouring huge PBSA - that is now Ustinov College - was ignored.

In (a) I am concerned about the words 'already in use'. One of the justifications for awarding 45 and 56 Dalton Crescent C4 conversion status was that the PBSA was not occupied, even though plans were well underway for students to move in during autumn 2017, and furthermore Durham University was publicising its plans to move Ustinov College from Howlands Farm to Sheraton Park in autumn 2017. Can you nuance the word 'in use' and add something about 'definite plans' in order to strengthen this bit of the policy?

I welcome (c) as anyone who has seen/driven past/found themselves caught up in flows of student pedestrians knows how overcrowded the pavements can become eg: Margery Lane, Church St.

Is there any chance of you strengthening (c) by carrying out a pedestrian origins and destinations survey jointly with Durham County Council and Durham University?

Is there any chance of you strengthening D3 as a whole so that it covers not only 3-6 bed HMOs and PBSAs, but also 1 and 2 bed flats? There is a rise in the number of developers applying to build 1-2 bed flats eg: 24 The Avenue, 36 The Hallgarth, 10 Redhills Terrace. These fall into the C3 category but are developed with the student market in mind.

Is there any chance of you counting the number of category D (ie: non-council tax paying) students in each postcode area/100 metre area in Durham in order to develop an accurate picture of the true extent of studentification across the city? The weakness in the Interim Policy is that it only covers certain categories of properties and students. Some students/properties fall outside these categories eg: properties where the landlord pays council tax, properties owned by students' parents/guardians, properties sub-divided into 1-2 bed flats and properties where the owners have spare rooms and take in student lodgers. A door to door survey (similar to a census survey) would shed lights on the extent of the different categories and help with the construction of an accurate evidence base which could be drawn on by decision-makers.

I must emphasize that I am not anti-student, I moved to Durham because it is a university city and I value the university. But over the past 10 years in particular the university has grown too big, the community has become increasingly unbalanced, and the feeling of cumulative damage and loss is intensifying. Some students notice this and they say things like " we realise how many of us there are in the city, it's less intimate in Durham than we thought it would be, it must be annoying, I realise we don't pay council tax so you are paying for our bins to be emptied." They have a right to a decent home during their time in Durham and they lose out from the current system as much as permanent residents in that they pay huge rents - hence their 'ripped off' campaign against over-priced (and sometimes shoddy) accommodation.

A stronger Interim Policy on Student Accommodation (and better enforcement) would benefit us all.

### **SWC5**

New comment on your post "Policy D4"

I welcome policy D4 and the emphasis on re-purposing - population ageing is an increasingly significant issue in the UK and progressive policy-making is needed. There are some good examples in Durham eg: the conversion of the old Post Office building on Claypath. Could the policy be further strengthened in ways which will increase the likelihood of other old buildings being converted in this way rather than becoming student accommodation?

### **SWC6**

New comment on your post "Policy G1"

Essential to start classifying our 'green assets' as carbon storage - critical that we do not lose any more (see the Natural Carbon storage map here (scroll down):

[https://community.rspb.org.uk/ourwork/b/martinharper/posts/our-best-places-for-nature-are-also-](https://community.rspb.org.uk/ourwork/b/martinharper/posts/our-best-places-for-nature-are-also)

important-carbon-stores-we-need-to-look-after-them?

utm\_source=campaigns\_update\_jun19&utm\_medium=email&utm\_content=b3\_text

Thanks.

### **SWC7**

New comment on your post "Housing Sites"

How do our roads cope with the additional vehicles that these planning approvals will bring? 1,297 households will equate to approximately 2,000 cars all trying to get in, out and around the city centre. Where are the schools, medical services and other infrastructure to support these households? What safeguards will be put in place to prevent landlords and their agents speculating, buying into these developments thereby interspersing residential communities with transient populations and the ASB these bring? Who will risk paying premium prices (and let's face it you will always pay a premium to live in DH1) to end up living next to students?