

**THEME 3: A CITY WITH A DIVERSE AND RESILIENT ECONOMY  
PLANNING ISSUE OR ACTION FOR CONSIDERATION  
26th March 2018**

The comments for Theme 3 that raise planning issues or actions that need consideration are listed below.

The comments have unique codes as follows:

- EQ = electronic questionnaire response
- Q = paper questionnaire response
- EM = email response
- WC = web comment

However, no personal details have been provided.

The letters making comments relevant to this theme are coded as follows:

- L1: Alan Townsend, Emeritus Professor
  - L1a: Summary document
  - L1b: Durham LFS Residents datafile
  - L1c: Durham LFS by Workplace datafile
  - L1d: Cities Totals datafile
  - L1e: Cities Sectors datafile
- L2: Coal Authority
- L4: CPRE (Campaign to Protect Rural England)
- L9: Durham County Council (DCC)
  - L9b: Appendices A,B,C
- L10: Durham Miners Association
- L11: Durham Pointers
- L12: Durham University
  - L12b: Response
- L13: Elvet Residents Association
- L19: MGH Card LLP (developer via DPP Planning)
- L23: Nevilles Cross Community Association
- L26: Southlands Management (property owners)
- L27: The Empty Shop CIC

- The codes for categorising the comments are as follows:
- c1: outside the remit of the neighbourhood plan
  - c1a: outside the Plan area
  - c1b: planning issue that has to be dealt with by the Council or by other bodies not by a neighbourhood plan
  - c1c: not a planning issue
- c2: a generic style comment of praise, blame, opinion etc not requiring a response just an acknowledgement
- c3: suggesting changes to the policies
- c4: suggesting changes to the projects
- c5: suggesting changes to the other text of the Plan

The issues for consideration are listed under a general section and then under each policy. For clarity, under each section only the relevant text in the columns is included. Similar comments have been grouped together as far as is possible.

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COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
<b>General comments about theme, or relevant across policies</b>		
<ul style="list-style-type: none"> <li>• Balance</li> <li>• Projects</li> <li>• Bus station</li> <li>• Text</li> <li>• Other</li> </ul>		
<b>Balance of commercial, cultural and residential use (also comments on this issue included under Policies E3 and E4)</b>		
EQ04 We don't need any more drinking establishments in Durham.	c2 Concern about drinking establishments	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
<p>EQ15 I</p> <p>But, but. Durham must stop pretending that it is going to be an industrial or even post-industrial hub - there are better places in the NE for that. So it has to focus on smaller ambitions.</p> <p>The City centre is a mess. There are not enough local or SMEs, just more and more telephone shops and coffee shops. Why not reduce business rates for incomers?</p> <p>This plan must be taken into account by the County Council.</p> <p>The retail plans seem to be focused on drinking and eating. Horrible and lacking imagination.</p>	<p>c3. Concern about threat of overdevelopment: city should have smaller ambitions.</p> <p>c2. Concern about retail balance, and proliferation of eating and drinking establishments.</p>	<p>Consider Theme 3 policies</p> <p>Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way</p>
Q09 We need more retail shops in the city eg John Lewis. Small business need to be encouraged to invest in shops (Less rent to pay) which would attract tourists in eg gift shops. Less coffee shops and charity shops. Copied from Theme 1	c2 Concern about types of retail activity	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types

		of commercial activities in the City in some way
Q19. E4. Not too many more bars, clubs, & estate agents etc. - not attractive to residents or visitors. Need museums & places to go that are not cafes & bars. Durham used to be a place to shop – not now.	C2 Suggestion to broaden the retail offer including culture and the arts	Though decisions about individual establishments are outside remit, consider if Theme 3 and Theme 6 policies can address the imbalance in the types of commercial activities in the City in some way [Also covered in Policy E4]
Q24 Shopping area too large; should encourage more residential. Copied to Theme 4	c3 Concern that retail area too large, and in favour of residential use.	Consider policies regarding retail in conjunction with Theme 4 policies.
Q32 Durham is primarily a tourist attraction rather than a major retail centre. Priority needs to be given to individual / distinct small shops rather than big chains – who are catered for on the 2 out-of-town sites.	c3. In favour of independent retailers.	Consider if Theme 3 policies can address this issue
EQ21 Independent retailers need to be encouraged to make the City different from other shopping destinations.	c3. In favour of independent retailers.	Consider if Theme 3 policies can address this issue
EQ24 There's a large number of cafes in the centre of Durham which are all lovely but it's not particularly diverse. The major chains are likely pushing out smaller, local cafes. Encouraging local business is important. Local business parks that encourage more financial services are important for a more balanced Durham city economy.	c2 Concern about types of retail activity	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
EQ31 4.125. I think the chances of getting a new department store are very low. The emphasis should be on encouraging the small, independent retailer offering a different / more interesting product and associated service, e.g. the 'Crushed Chilli Gallery' which as well as selling glassware etc. runs glasses in glass making and crafts.	c3. In favour of independent retailers.	Consider if Theme 3 policies can address this issue
EQ39 I have scrutinised these aspects of the plan in detail not least because of my concerns about recent developments of retail establishments and drinking establishments in Durham. The policies are well- focused on balanced retail development; and appropriate siting of employment creating	c2. Concern about drinking etc establishments	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can

business.		address the imbalance in the types of commercial activities in the City in some way
EQ39 I have scrutinised these aspects of the plan in detail not least because of my concerns about recent developments of retail establishments and drinking establishments in Durham. The policies are well- focused on balanced retail development; and appropriate siting of employment creating business.	c2. Concern about drinking etc establishments	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
EQ48 Any retail development not only geared up to an itinerant student population would help diversity.	c2 Concern about range of retail development	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
Q53 Variety of employment, encouraging local initiative and small scale set ups all important. At present there is an imbalance, too few shops, too many drink and food outlets.	c2 Concern about commercial imbalance	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
69 Opportunity should be taken to reduce the current high proportion of drinking establishments in favour of a more normal retail offer, with the aim of decreasing the 'night-time economy' with its accompanying disorder and negative public behaviour. ... Part Copied to Theme 4	c2. Concern about high proportion of drinking establishments	Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way
<b>Projects</b>		
Q35 I would like the Millennium Place economy to be more varied, eg a	C5 Suggestion re Millennium Place,	Consider text change to policy E3

small bowling alley or roller/blade skating rink on the broad terrace below the main plaza.	addressed in Policy E3 A) 2) and by Project 12	wording and coverage in Project 12 [Also included under Policy E3]
Q66 Improvements in North road – for example, imaginative use of the old Robins cinema – would be welcomed.	c2. Support for North Road improvements. Addressed by Policies E3 and E4 to some extent and by Project 13 North Road Regeneration	Consider Project 13
WC85 Copied to Theme 6 Durham needs more toilet facilities in the centre, more seating that can be sat on i.e. wooden benches (and not stone blocks as per the market square, which are truly uncomfortable), including more seats along the river bank, and to encourage more shops to come into the city (lower rates?) instead of the numerous cafes. Also, the area outside the Gala Theatre should be redesigned, instead of 'windy city' we should have a beautiful area with pleasant seating etc.	Suggestions for improvement of City Centre. Addressed by Projects 9 and 12	Consider coverage of these points in projects
WC103 The SRA [Sidegate Residents Association] is particularly concerned about North Road. We would like to see the Empty Shop studios above the bus station shops as a catalyst for the development of an arts area similar to Ouseburn. The Shakespeare Hall could also come into play. It is also the point of entry for people coming to the city from neighbouring villages by bus and must also offer the kind of shops they want to see. Charity shops have an important role to play in both meeting people's needs and in recycling goods.	c2. Suggestions for uses of North Rd, including positive role for charity shops. Addressed to some extent by Project 13.	Consider coverage of North Rd by Theme 3. And additions to Project 13. [Also included under general]
WC116 I agree with the SRA [Sidegate Residents Association] that the North Road is a particular area of concern. A lively retail sector here could support arts and heritage premises which would form a suitable entry point to the city. The conversion of Milburngate / the Gates from primarily retail use to residential, with retail provision taking a second place, breaks the flow of customers from the Market Place, and care will be needed to encourage shoppers past this 'natural break' (in both directions).	c2. Suggestions for uses of North Rd. Addressed to some extent by Project 13.	Consider coverage of North Rd by Policy E4. And additions to Project 13. [Also included in Policy E4]
WC128	BALANCEC3 concern regarding the	Consider how Theme 3 policies are

<p>This theme, 'A Diverse and Resilient Economy' is of particular concern. Durham City is no longer noteworthy as a place where people may expect to enjoy a unique shopping experience that fits in with a heritage city. This is a great shame as other cities, not too far away, for example York City, have achieved this. Durham City is now noteworthy for its proliferation of coffee bars and, per head of population, may now equal the US city of Seattle as the coffee capital of the world! The proposal to build yet more coffee bars and restaurants in new developments at The Gates and at Milburngate must be a cause for concern. What stops small shopkeepers from setting up their businesses in Durham City? Are exorbitant rents and other financial penalties a factor?</p>	<p>retail offer in Durham</p>	<p>addressing this issue</p>
<p><b>Bus station</b></p>		
<p>EQ49 On E3, while I completely support the strengthening of the vitality of the primary retail core, and the reinvigoration of an's retail economy, I am totally opposed to any suggestion that the latter should entail moving the bus station to the north of its present site, together with the associated changes to traffic circulation that have been proposed. Copied to Theme 5</p>	<p>c2.Objection to Council moving the bus station north of North Road roundabout</p>	<p>Consider coverage of bus station in Plan</p>
<p>Q64 See above comments about bus station redevelopment [i.e. I consider the proposals for the new bus station to be flawed and unnecessary.] The new proposed station will cause light issues within a listed building and is entirely inappropriate. Refurbishing the current station would be much better.</p>	<p>c2. Concern about DCC's plans for the bus station.</p>	<p>Consider coverage of bus station within Theme 3</p>
<p><b>Text</b></p>		
<p>Q35 I agree with all but I would like lower Claypath included by name – in 4.97 upgrading &amp; in policies re primary &amp; secondary frontages (with emphasis on Policy E4.4).</p>	<p>C5 Suggestion of text change to include Lower Claypath in paragraph 4.97 and E4.4</p>	<p>Consider text change [Also included under Policy E4]</p>
<p>EQ20 This Theme must acknowledge the crucial contribution that Durham University makes to the City's economy (both as large employer and student destination) without which there would be no diverse or resilient economy in</p>	<p>C5 Suggestion to change text to acknowledge University's contribution to the economy.</p>	<p>Consider text change</p>

this City.		
EQ31 Slightly amending of the wording of the vision statements to provide consistency of wording with the overall vision would be helpful. For Theme 3: Durham City will have a sustainable and vibrant local economy, supporting large and small businesses, retail and tourism, and encouraging employment opportunities.	C5 Suggestion for re-wording vision statement	Consider re-wording vision statement
Q62 Map 8 infill colour for "Other Employment" does not match the key	C5 Correction to Map 8	Check and amend map and key
<p style="text-align: center;"><b><u>NEW EMPLOYMENT DATA FOR THE DURHAM NEIGHBOURHOOD PLAN AREA (NPA)</u></b></p> <p style="text-align: center;"><b>With comparison with Durham City as a whole</b> <i>(that is, the City of Durham Constituency/former District Council area)</i></p> <p><b>INTRODUCTION (see last paragraph for technical notes)</b></p> <p>While employment itself is one of the main aspects of the Neighbourhood Plan, data mainly of the Business Register and Employment Survey (BRES) for September, 2016, also provide a surrogate for other measures of activity; for example, on the question of whether the NPA area has been allowed too many restaurants and cafes.</p> <ul style="list-style-type: none"> <li>• There has been a <i>hollowing out</i> of activity from the NPA area, which no longer has half the jobs of the former City area, as in 2007 or 2011.</li> <li>• This was due to the loss of specialist shops and their replacement by larger supermarkets in the rest of the former City area, together with losses from wider accommodation and food services, and from the County Council site.</li> <li>• Two-thirds of NPA jobs remain in public services; including University, Hospital and County work.</li> <li>• More than two-fifths of employees work part-time (less than 30 hours per week), substantially above the GB level</li> <li>• It was found that <i>this area</i> has nearly three times the average national share of licensed restaurants, but only the average of unlicensed restaurants and cafes.</li> <li>• (From the 2011 Census) NPA <i>resident</i> people in work make up only a tenth of the daytime workforce, among whom nearly two-thirds</li> </ul>	c5. Evidence for context section of Theme 3 and Appendix E. Also for SA report.	Consider adding in this evidence, plus use of this evidence in the SA process when considering amending Theme 3 policies



travelled in by car.

- The Constituency/former City as a whole is a natural “growth point” of the County relative to the surrounding areas as a whole, but this description does not apply to the NPA area, at least pending the completion of a large amount of building work.

### **RELATIONSHIP TO RESIDENTS**

The interests of residents and business are very different. It is important to note that the NPA area has very different day-time and night-time, term-time and vacation populations. The 2011 Census at least distinguishes these. Just 2,300 people both lived and worked in the area in 2011, compared with a total of 23,000 workplace jobs and a total “out-of-term-time” population of 16 to 74 of 9,500. However, the latter total still includes “2,900 students” as well as 1,200 retired, 200 unemployed and 900 others, leaving 4,800 economically active in work – a relatively low activity rate – including 520 self-employed residents.

A considerable proportion of those 2,500 people commuting out of the NPA travelled to adjoining and surrounding wards of the former City and vice versa. However, taking necessarily a slightly wider statistical area including the Durham industrial estate at Meadowfield, we know that in 2011, while 13% of the NPA workforce travelled in less than 2 km., and 18% between 2 and 5 km., no less than 22% had a journey of 5-10km. and 31% 10-20 km. Unsurprisingly, no less than 63.9% of the NPA workforce travelled to work by car or van, with only 11.8% by public transport and 11.4% on foot. The jobs of the area were more “white collar” than in England and Wales as a whole: the median job of the area is of the “supervisory, clerical and junior management” kind, with 37.5% of the total, and 28.2% were in management and administrative jobs.

### **COMPARISON WITH DURHAM CITY CONSTITUENCY/FORMER DISTRICT AREA**

- All data from here are to 2016, and exclude the self-employed, a major sector of recent employment growth. as in most places.
- The NPA area contains about 21,000 employee jobs, of which at least 8,000 are held by part-time staff working less than 30 hours per week. This proportion of 41.0% is greater than the national GB

<p>average of 32.2%.</p> <ul style="list-style-type: none"> <li>• The overall number has definitely fallen over the last nine years, showing a marked tendency to decline since 2011, when it stood at 23,000.</li> <li>• Whereas in 2007, the NPA area held half the employee jobs of the former City, 24,000 out of 48,000, the NPA's share has decreased to 46.2%.</li> <li>• The "Outer City" – the former City less the NPA area – has better recovered employment levels since the recession of 2008, increasing from 23,000 in 2011 to 25,000 jobs in 2016.</li> <li>• We know from the LFS/APS, including self-employed, that total workplace jobs in the former City as a whole increased from about 56,000 in 2007 to about 59,000 in 2016 (using 3-year moving means to offset sample error), or from 29% to 31% of the County's jobs, when resident population aged 16-64 remained at about 20% of the County total.</li> <li>• Thus the Constituency/former City as a whole is a natural "growth point" of the County relative to the surrounding areas a whole, but this description does not apply to the NPA area.</li> </ul> <p>[attached files 2 CITIES TOTALS + PART-TIME; DURHAM LFS BY WORKPLACE; DURHAM LFS BY RESIDENTS]</p> <p><b>COMPOSITION OF ECONOMIC ACTIVITY IN THE NPA AREA</b></p> <ul style="list-style-type: none"> <li>• Given the presence of the University, the University Hospital, the historic Prison and the County Council headquarters, it is not surprising that public services together employ 14,000 staff of the 21,000 in the area, or two-thirds of the total.</li> <li>• This is a reduction from the total of 16,000 in 2007 and 2011, due to the loss of administrative work, principally in the County Council. In both 2011 and 2016 the University exceeded Hospital work in size with 4,000 employee jobs compared with 3,000 in the Hospital.</li> <li>• A separate calculation from the same source shows that the "public sector" is now credited with 18% of jobs in GB, having declined, in the era of public spending cuts since the recession.</li> <li>• The next most important sector of the NPA area involves hotels, food and drink, together employing 1,750 people (8.3%), including</li> </ul>		
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the majority of City jobs in licensed restaurants, public houses and bars – though not a majority, in these 2016 data, - in hotels or other food provision.

- By contrast the NPA area employs very small numbers (much less than the “Outer City”) in activities requiring physical access; manufacturing, transport, wholesaling and storage, motor trades and builders’ depots.
- It will require reflection that retail sector jobs in the NPA area stand at only 1,000 (4.8%), having declined from 1,750 in 2007 to 1,250 in 2011 – within the constant total of 4,000 for the City as a whole. There is a closer analysis of sub-sectors below.
- It is perhaps disappointing that the whole of the nationally buoyant group of financial and business services is poorly represented in the NPA area, with only 1,800 jobs together (in industries 10-14 inclusive) , compared with 3,500 in the “Outer City” and 3,100 in 2007.

[attached file 2 CITIES SECTORS]

#### **COMPARING ELEMENTS OF CHANGE, 2007-2011 and 2011-2016**

- Remarkably, there are very few sectors of expanding employee jobs in the NPA area. In the attached Table, where the data are divided into two time periods and 18 sectors; there are apparent increases to be found in Education and Health (apart from a temporary increase in finance, professional, scientific and technical sectors), but in effect they simply changed places, with the Hospital the leading sector with 4,000 jobs in 2007, the University with 3,000, a position reversed from 2001.
- Retailing declines by 750 jobs, principally in non-specialised sectors, and accommodation and food services by 500, 2007-16 (but see below).
- Looking at more detailed headings, restaurants did increase, by 400 jobs, between 2007 and 2011. Remarkably the information and communication sector was affected by a reported reduction of 575 employee jobs in programming and consultancy, and there are other apparent losses in activities such as management consultancy.

<p>[attached 2 CITIES SECTORS]</p> <p><b>CITY CENTRE ACTIVITIES</b></p> <ul style="list-style-type: none"> <li>• More detailed analysis shows a shift away from the City centre (NPA) within the stable totals – in both 2007 and 2016 for the City as a whole - of 4,000 in retailing and 4,500 in accommodation and food services.</li> <li>• In retailing the reduction from 1,750 to 1,000 NPA employee jobs results from a trend away from specialist shops in both parts of the City, and a drop in supermarket (“non-specialist retailing”) jobs; in 2007 the centre held 600 out of the total of 1,750 jobs of this type compared with 350 out of 2,000 in 2016.</li> <li>• In accommodation and food services the reduction from 2,250 in 2007 to 1,750 in 2016 occurred despite an apparent increase in the main activities, from 500 to 700 in restaurants and 450 to 530 in pubs, bars and clubs.</li> <li>• This includes an 88% "excess compared with GB data" of employee jobs in licensed restaurants and cafes, but none for unlicensed. Further data shows that there's no excess for the wider industry (hotels, pubs and sale of drink and prepared food together) over the wider area (the Travel-to-Work area which now includes Bishop Auckland).</li> </ul> <p><b>SOURCE NOTES</b></p> <p>All data are obtained via Durham University’s “Nomis” system, which received the annual GB-wide update to data for employment by workplace on October 2. This provides detailed reporting for employees at work by local areas to September, 2016 and is compared back here and in attachments to 2007, including the period 2009-2012 previously reported in 2014 to the Neighbourhood Development Forum.</p> <p>The main analysis covers workplaces in the Neighbourhood Plan Area (NPA), by summing figures for “Medium” and “Lower Super Output” (statistical) Areas, which align precisely with data previously extracted under the title of the “Neighbourhood Development Forum”, which combined 3 former City Wards. This area is too small to carry statistically significant results in the Labour Force Survey or Annual Population Surveys (LFS/APS), used by the Neighbourhood Plan for activity rate analysis,</p>		
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because they are sampled surveys (although they alone, unlike BRES, include the self-employed).		
L9 b Appendix C At 4.91 It is unclear what is meant by 'limited lunchtime economy' and how this has been evidenced.	TEXT C5 comment regarding text	Consider adding evidence to the text
<b>Other</b>		
EQ43 Re: Policy S2.9 - Appropriate adaptation for re-use of existing buildings in the city centre is something we wholeheartedly back as an organisation. We would like to see evidence that property owners have explored the potential for adaptive re-use of primary and secondary frontage premises before permission is granted for demolition or major alteration, unless the usage is deemed to be a priority i.e. appropriate to town centre use as defined in the Economic policy proposals. Copied from Theme 1	c3 Suggestion for policy change re adaptive use etc.	Consider Theme 3 policies
Q39 So much needs to be sustainably and imaginatively developed. Not all large scales.	C2 Concern about design and sustainability	Consider a design strategy somewhere in the plan, in relationship with Themes 1 and 2a
Q43 It is a bit surprising that there is no policy specifically about tourism.	C3 Suggestion for additional policy about tourism	Consider policy suggestion as well as addressing it through a project such as Project 14
WC6 Theme 2a The Prince Bishops and Milburngate developments block the views of our beautiful city and these types of developments really need to be better thought out.	C2 Comment on loss of views and lack of design-brief for large scale developments in the City. Safeguarding views addressed by Policy E3 and Theme 2a A Beautiful and Historic City- Heritage Policies H1 & H2	Consider need for design briefs

<p>L2 It is noted that the Neighbourhood Plan appears to propose the allocation of sites for future development. I can see no reference in the Neighbourhood Plan to the potential risks posed to development by past coal mining activity or any evidence that consideration has been given to these issues. The Coal Authority would therefore wish to see consideration given to the risks posed to the proposed developments by past coal mining activity in accordance with National Planning Policy prior to any formal allocation. The Coal Authority is of the opinion that building over the top of, or in close proximity to, mine entries should be avoided wherever possible, even after they have been capped, in line with our adopted policy: <a href="https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries">https://www.gov.uk/government/publications/building-on-or-within-the-influencing-distance-of-mine-entries</a></p>	<p>Comment regarding the development of previously mined land but also c1b. Building regulation issue outside our remit (for other body)</p>	<p>Consider changing text for land development policies to include this restriction</p>
<p>L9 b appendix A However, the county council is mindful that it is not the role of a neighbourhood plan to deal with strategic matters or to advocate policy approaches or proposals which conflict with the current local plan (in this case the City of Durham Local Plan (CDLP)) and policy approaches set out in the more recent National Planning Policy Framework(NPPF). The current draft of the DCNP contains a suite of planning policies which fall into one of the following types:</p> <ul style="list-style-type: none"> <li>• Land use zoning (i.e. Employment land (strategic and non- strategic sites) and non-strategic housing land use allocations)</li> </ul> <p>In terms of this plan the county council firmly considers that these strategic aspects centre on inclusion of policies which:</p> <ul style="list-style-type: none"> <li>• Allocate 'strategic' employment sites at Aykley Heads and at Mount Joy.</li> <li>• Significantly alter the boundary of the primary and secondary retail frontages within the city centre as defined in the CDLP and in the absence of any robust evidence</li> </ul>	<p>C2 Objection regarding scope of plan and the inclusion of strategic sites for employment which DCC consider outside the remit of a NP, i.e. Policy E1, Policy E3</p>	<p>Objection noted and agree to be discussed with officers</p>
<p>L9 b Appendix A The council has identified several instances where the DCNP approach deviates from and conflicts with that of the council's existing and evidence relating to emerging plans and strategies. Examples of this include:</p>	<p>C2 Objection regarding conflict with emerging DCC Local Plan. Specifically noting policies E1, E2, C2, G2, G3</p>	<p>Objection noted and agree to be discussed with officers. Policy C2 to be covered by the Community Theme discussions.</p>

<p>d) Site allocations: The extent of the redevelopment site of Aykley Heads</p> <p>e) Approach to town centre uses: which includes a proposal to redefine the primary and secondary frontages. The implication is that town centre uses other than retail will be unable to locate within a larger part of the City centre (including areas such as North Road and Milburngate which could benefit from a more diverse range of town centre uses).</p> <p>g) Approach to tourism: which fails to adequately recognise the key challenges facing the visitor economy of Durham, and as such this is a missed opportunity for the DCNP to add value to the existing policy context for the area.</p> <p>Furthermore, the DCNP which advocates the provision of a visitor centre which is an approach which has proved unsuccessful in the past and conflicts with Visit Durham's existing approach.</p> <p>In light of the above the county council is concerned that the plan is deficient in this respect in the context of the requirement to meet the relevant Basic Condition relating to this matter. It is firmly urged that this situation is remedied as the plan prior to the plan advancing to Submission stage.</p> <p><b>REPRESENTATIONS REGARDING COUNCIL ASSETS</b></p> <p>To date the DCNF have not formally discussed the inclusion of any county council owned sites with the Assets Team. This relates back to the concerns raised regarding the effectiveness of pre consultation engagement. As part of preparing this response the county council's assets team have now undertaken an interrogation of the council's land terrier in the context of the draft plans content. The following council owned sites have been identified as being specifically referenced:</p> <ul style="list-style-type: none"> <li>• The Aykley Heads site</li> </ul> <p>The proposed Aykley Heads allocation is shown on a map as a number of separate development parcels with all Green Belt land (including County Hall car park) excluded. The county council firmly considers that Aykley Heads is a 'strategic' employment site and therefore should not be included in the Neighbourhood Plan in any form as it is a matter for the Local Plan. Notwithstanding this, the main concern to the county council is the exclusion of any Green Belt land from the Aykley Heads employment site identified in</p>		<p>Policies G2 and G3 to be covered by the Green Infrastructure Theme discussions.</p> <p>Note: Only the DLI grounds are covered in Policy G2 as a Local Green Space. The sites in the Emerald Network (Policy G3), which includes Aykley Heads, as a whole are not designated as Local Green Spaces.</p> <p>Note: These Economy sites were covered in the December 2017 meeting with DCC</p>
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<p>Policy E1, particularly in light of the fact that there has been no discussion with the council as landowner about this.</p> <ul style="list-style-type: none"> <li>• Fowlers Yard</li> </ul> <p>This site is allocated by DCNP Policy E2 (Other Employment Sites) for office and business enterprises (Use Class B1). The site is currently occupied and this policy deviates from the scope of uses that exist and would be permitted within it. There is no adequate justification provided for this allocation and the implications for it have not been sufficiently considered. From a policy perspective the plan serves to limit the types of uses that would be permitted within this City centre location which is contrary to the national policy approach. From a land owner perspective such restrictions are unjustified and could impact upon the future ability for the council to secure full occupancy of the units concerned.</p> <ul style="list-style-type: none"> <li>• Aykley Heads/ DLI</li> </ul> <p>This site is designated as a Local Green Space as part of the proposed 'Emerald Network'. In doing so this protected status would be the equivalent of Greenbelt. However, the site is already afforded Greenbelt protection and therefore the proposal seems superfluous.</p>		
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<b>Policy E1: Larger Employment Sites</b>		
EQ13 Mountjoy would only be suitable with very major road changes. Even without future university expansion traffic jams are already quite frequent. Copied to Theme 5	c3 Concern over road access to Mountjoy	Consider coverage in Policy E1 and cross ref to Theme 5
EQ23 E1 - More needs to be made of this. National government policies are not particularly strong either, including the new Industrial Strategy. In Durham City, the Aykley Heads site is excellently located. All efforts should be made to attract future-focussed businesses (like Atom Bank) and to resist overtures from developers and businesses who want it because it is a good location and has a DH1 postcode. The built (and non-built) environment will be important to these businesses and the accesses to the railway station, A1M and airport. Active involvement of the University (but not led by the University) is also essential for success. The current plan is too laissez-faire and will in all likelihood end up being development driven rather than policy or people driven.	C3 Suggestion to strengthen wording of E1 Larger Employment Sites to have control over the design and purpose of the Aykley Heads site	Concern noted and consider strengthening the wording of policy E1. Consider including a master plan in policy E1
EQ42 I endorse the support to be given to development for new businesses at Aykley Heads and the Science Site in line with Economy Policies E1 & E2, however for the larger development proposals such as these traffic management/vehicular access solutions must be carefully explored (particularly at Aykley Heads). Copied to Transport Theme 5 Policy T1	C3 Support for Policies E1 and E2 but raises concern about access and traffic management	Consider a master plan for Policy E1 to deal with access issues (see comment above in EQ23) and cross reference to Theme 5 Policy T1 Accessibility of Proposed Developments
EQ49 On E1, the objective should be secured without encroachment on the existing Green Belt. It is also essential that, if appropriate employment uses do not emerge, other uses - eg family housing or hospital expansion - should not be precluded for consideration at Aykley Heads.	C3 support for E1 no encroachment on green belt, however others uses for the Aykley Head site should be considered.	Support for E1 non-encroachment on green belt noted, but consideration for other uses for Aykley Heads should be given. Consider including a master plan in Policy E1
Q15 Could not some of this development be carried out at the former colliery villages – It would give them a boost. Durham city needs to decide what sort of town it wants to be.	c3. In favour of development in villages rather than Durham city.	Consider amending policies E1 and E2 to constrain further development in the city. [Also covered under Policy E2]
Q42 E1: There should be no detriment to existing provision eg DLI	C2 Suggestion to protect DLI building	Concern regarding loss of DLI

museum closure. Copied to Theme 6	at Aykley Heads site through policy E1	building noted. Consider Policy E1
Q43 Policy e1 needs to mention the need for a master plan which incorporates the S.D. requirements.	C3 Suggesting change to Policy E1 regarding need for a master plan at both sites	Suggestion regarding E1 noted and consideration will be given to incorporating a master plan for the both sites in Policy E1-See comments above (EQ23, EQ42, EQ49)
Q48 Development at Aykley Heads should be limited to avoid traffic congestion at the small roundabout at the hospital. Copied to Theme 5	C3 Concern about traffic congestion at Aykley Heads	Consider coverage in Policy E1 and relationship with Theme 5 and Project 7
Q73 Risk of more pollution from cars and lorries passing through the City. (Although controversial - ? need for a bypass ?!) Copied to Theme 5	c1b. Concern about pollution caused by traffic. Outside our remit to some extent but addressed to some extent by Theme 5	Consider effect of Policy E1 in relationship to Theme 5
Q75 I don't think a major development of a business park at Aykley Heads is warranted unless major improvements to transport links are made, ie regular public transport, improvements to paths and cycleways in order to avoid future congestion by cars and other vehicles. Copied to Theme 5	C3 Concern with transport issues for Policy E1 Aykley Heads business park.	Consider effect of Policy E1 in relationship to Theme 5
Q76 E1. Aykley Heads could be developed for mixed uses near the railway station and Wharton Park, this could consist of hotels, museums, art galleries, cafes, linked together to provide mixed and vibrant uses. Massing scale, height and materials are very important considerations at Aykley Heads as well as belts of planting.	C3 Suggestion for uses at Aykley Heads Policy E1	Consider change of wording in Policy E1 to include wider uses for Aykley Heads site.
EM8. ... mentioned that you are interested in hearing about my Masters' Aykley Heads project. For the wider site strategic plan, I covered the Frankland Farm and riverside area also. Following that I developed a hotel with an edible landscape on the site of the station long-stay car park. Although it has been completed (as a hypothetical study), it would be very interesting for me to discuss it with you or the whole Forum. Please get in touch if you would like to arrange a meeting. Forum response (summary). Thanks given and information provided about drop in sessions.	C2 comment policy E1 and sharing of ideas	Comment noted and consider scheduling meeting with correspondent

<p>WC25 Copied to Theme 5 POLICY E 1. In accepting the identification of the Aykley Heads site as one with the potential to locate high-tec businesses and employment opportunity it is crucial that access arrangements are planned to take account of and deal effectively with the enormous additional volume of traffic which will be generated in the Sniperley roundabout area, given plans for very major housing development at Sniperley, and the spectre of the so-called western relief road converging at this point. Copied to Transport Theme 5 Policy T1</p>	<p>C3 Comment regarding generation of traffic and access to Aykley Heads site Policy E1</p>	<p>Consider change to policy E1 to include a master plan and cross reference to Theme 5 Policy T1</p>
<p>L4 Supports proposals which will help to save greenfield sites outside the city from being developed. We welcomed these proposals and note that policy E1 in respect of Akley Heads specifically supports the development of non-greenbelt land. We believe however that the design of these developments should include provision for sustainable transport – see comments on Theme 5</p>	<p>c3. Need for sustainable transport links to business sites</p>	<p>Addressed by Theme 5. But also consider change to Theme 3 policies and supporting text</p>
<p>L9b Site E1.1 Aykley Heads, the county council firmly considers that the site is 'strategic' and therefore should not be included in the Neighbourhood Plan in any form as it is a matter for the Local Plan. The county council therefore strongly opposes the inclusion of this policy and further references to it within the supporting text of the policy.</p>	<p>C2 Objection to Policy E1 regarding the Aykley Heads site as being 'strategic'</p>	<p>Discuss with council officers</p>
<p>L9b Site E1.2 Durham Science Park, , the county council firmly considers that the site is 'strategic' and therefore should not be included in the Neighbourhood Plan in any form as it is a matter for the Local Plan. Notwithstanding this the county council would advise on-going discussion with the landowners to understand the site's availability and their aspirations for the type of development on the site.</p>	<p>C2 Objection to Policy E1 regarding the Durham Science Park as being 'strategic'</p>	<p>Discuss with council officers</p>
<p>L12 Policy E1.2 refers to upper Mount Joy and is a legacy of a 2004 City plan. This university's intentions have changed in the last 13 years and this allocation could conflict with the master plan which proposed a higher education used for science faculties. We request a widening of scope and text policy to include educational uses.</p>	<p>C2 Objection comment to the scope of development at the Mountjoy site (Policy E1.2) which Durham University are the landowners of.</p>	<p>Objection noted and consideration be given to this request for broadening the wording of the policy</p>

<p>Site E1.2 – Mountjoy – <i>a minimum buffer of 15 m of native tree planting is required against the ancient woodland and the wetlands.</i> 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 15 m) in the context of the proposed scheme. Reword: “ a buffer of native treeplanting is required against the ancient woodland and the wetlands”</p>	<p>C5 Comment on the wording of E1.2 paragraph 4.109 and re-wording suggested</p>	<p>Consider changing text. Note: This wording was a DCC suggestion</p>
<p>L14 We encourage sustainable flood prevention measures with the new development such as SuDs and we will make it recommend that these are designed in a way that provides additional happy habitat.</p>	<p>C3 c5 Comment regarding resilience to climate change and flood prevention</p>	<p>Consider if text change may be necessary in Policies E1 &amp; E2 with regard to carrying out a sequential test on flood risk sites. [Also included under Policy E2]</p>
<p>L23 We have reservations about policy E1: larger employment sites, and suspect that the entrepreneurial Hub proposed for Aykley Heads is not sufficiently evidenced. We would not oppose the policy but we wish the plan to ensure that the hub precedes any proposal for executive housing. There is likely to be sufficient housing in Durham and especially at Mount Oswald to supplement the hub but we would reluctantly support the use of the site for housing alone.</p>	<p>C2 concern that the site at Aykley Heads will become a housing development not a business hub</p>	<p>Consider Policy E1 wording re effectiveness</p>

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
<b><i>Policy E2: Other Employment Sites</i></b>		
Q15 Could not some of this development be carried out at the former colliery villages – It would give them a boost. Durham city needs to decide what sort of town it wants to be.	c3. In favour of development in villages rather than Durham city.	Consider amending policies E1 and E2 to constrain further development in the city. [Also covered under Policy E2]
Q33 Durham definitely needs more small, interesting shops for both residents & the tourists. Fowler’s Yard should be for that purpose not for finance and business services. ... Centre of York is a good example.	c2 Role of Fowlers Yard addressed by policies E2, E3 & E4	Consider strengthening text re Fowlers Yard [Also included under Policies E3 and E4]
Q37 E2. Important that Fowler’s Yard should be protected as a cluster of independent craft businesses & workshops – safe from demolition & rebuild plans. Local theatre building should be safeguarded.	c3 c5 suggestion for safeguarding current uses of Fowlers Yard	Consider strengthening wording of policy E2:1 and text re theatre
EQ42 I endorse the support to be given to development for new businesses at Aykley Heads and the Science Site in line with Economy Policies E1 & E2, however for the larger development proposals such as these traffic management/vehicular access solutions must be carefully explored (particularly at Aykley Heads). Copied to Transport Theme 5 Policy T1	C3 Support for Policies E1 and E2 but raises concern about access and traffic management	Consider a master plan for Policy E1 to deal with access issues (see comment above in EQ23) and cross reference to Theme 5 Policy T1 Accessibility of Proposed Developments
EQ43. Re: Policy E2.1. Further development of Fowler’s Yard must be undertaken in such a fashion as to preserve the existing creative space for local artists and practitioners or alternative, affordable, city centre based provision for the creative community provided.	C3 suggestion for safeguarding current uses of Fowler’s Yard	Consider strengthening wording of Policy E2:1
Q63 Policy E2 should be more restrictive on development in flood zones 2 & 3 and in Green Belt. Copy to Theme 1 Policy S1.2 & S1.5	C3 Suggestion to refer to restrictive development in flood zones and Green Belt in Policy E2	Consider suggestion to additional wording in Policy E2 regarding development in Green Belt and Flood Zone and cross- reference to Policy S1.2 & S1.5 Sustainable Development Requirements of All

		Development and Redevelopment Sites
<p>WC26 POLICY E 2. I support this Policy and especially the content of para. 4.11 in relation to existing approvals on large sites. With sites being limited would there be benefit in including within the Policy emphasis on better utilisation of existing buildings/underused space?</p>	<p>C3 Support for Policy E2 and suggestion to include wording similar to Policy E3 B). 2 reuse of underused space</p>	<p>Consider strengthening wording in Policy E2 similar to paragraph in Policy E3 B).2</p>
<p>L9b E2.1 The county council is concerned over how the sites in E.2.1 will be developed given that they appear to currently have buildings and structures on them. The 'term' development needs defining for the purpose of this policy. With regards to all three sites, the county council would advise on-going discussion with the landowners to understand the site's availability and the owner's aspirations for the type of development on the site.</p> <p>In addition it is unclear what 'district centres' the plan refers to, these do not appear to be defined and are not mentioned within the supporting text.</p>	<p>C5, c3 Comment regarding term 'development' and term 'district centres'</p>	<p>Consider revising text and Policy E2.1</p>
<p>L9 b Site E2.1.1 Blagdon Depot, as acknowledged within para 4.113 the site is located within Green Belt. The County Council is concerned that the exceptional circumstances for development within the Green Belt are not articulated and not supported through sufficient evidence.</p> <p>In relation to flood risk on the site, the County Council advise that given the identified flood risk, a sequential test should have been carried out prior to allocating which would form part of the evidence for its allocation. This presents a procedural issue for the plan that must be addressed.</p> <p>The policy is proposing uses within the A2 and B1 use class that by definition within the Annex 2 of the NPPF would be main town centre uses that should be located with the town (city) centre in the first instance. This site would represent an 'edge of centre' site by the boundaries defined within the Plan.</p> <p>The county council would advise that such an allocation should be justified by evidence including a sequential test, looking at the potential of sites within</p>	<p>c2. Concerns about Site E2.1.1. re Green Belt uses and flood risk. Need for sequential test</p>	<p>Consider uses appropriate for site E2.1.1. Discuss with Council.</p>

<p>the city centre first. This presents a procedural issue for the plan that must be addressed.</p> <p>Given all of the above, the county council strongly advises that the allocation of this site requires further consideration.</p>		
<p>L9b Site E2.1.2 Providence Row, the county council advises that given the identified flood risk, a sequential test should have been carried out prior to allocating which would form part of the evidence for its allocation. This presents a procedural issue for the plan that must be addressed.</p>	<p>c2. Need for a sequential test for site E2.1.2.</p>	<p>Discuss with Council</p>
<p>L9b Site E2.1.3 Fowlers Yard, the county council is unclear on the rationale for this site's allocation for A2 and B1 given that, as acknowledged, it is 'an area already thriving as craft and specialist shops'. Furthermore, the site falls within the ownership of the county council and it is concerning that the proposals for this site have not been explored with the council as land owner.</p>	<p>c2. Concern over uses for site E2.1.4 c2. Concern over ownership issues</p>	<p>Discuss with Council Note: These Economy sites were covered in the December 2017 meeting with DCC?</p>
<p>L9b E2.2 The county council is concerned over the wording within this policy which is very general. For example there may be instances where a windfall brownfield site would be wholly inappropriate for residential development due to other issues such as amenity.</p>	<p>c2. Concern over wording of Policy E2.2. Needs clarification</p>	<p>Discuss with Council</p>
<p>L9b The county council wishes to point out that in the interests of clarity the wording of paragraphs 4.114 – 4.116 should be reconsidered. Furthermore, in respect to this text: At Para 4.114 the county council is concerned over the emotive wording within this paragraph. There is no evidence that the approvals have been unsupported. Notwithstanding this the positioning of this text within this part of the plan is questioned. At Para 4.115 the county council is concerned over the wording within this paragraph.</p>	<p>c5. Concern over text paras 4.114 - 4.116</p>	<p>Consider changing text</p>

<p>It implies that businesses should be located on these sites in the first instance. Whilst unclear what type of businesses the text refers to, if it is interpreted that it refers to A2 and B1 uses, it should be noted that these are town centre uses and should not be restricted by having to locate to these allocations. In addition the reference to 'local centres' is confusing as these do not appear to be defined anywhere within the Plan. The paragraph as a whole is confusing and should be amended. At Para 4.116 the county council is unclear as to what an 'external, flexible space' is and how this could be assessed and applied through the Development Management process.</p>		
<p>L12 E2.2: <i>support will be given to the development of residential, including units for older people, families with children and young professionals.</i> Either 'families with children, and young professionals' or 'young professionals and families with children'</p>	<p>c3, c5. Comment on suggested rewording of E2.2 and paragraph 4.114</p>	<p>Consider changes to policy and text</p>
<p>L14 We encourage sustainable flood prevention measures with the new development such as SuDs and we will make it recommend that these are designed in a way that provides additional happy habitat.</p>	<p>C3 c5 Comment regarding resilience to climate change and flood prevention</p>	<p>Consider if text change may be necessary in Policies E1 &amp; E2 with regard to carrying out a sequential test on flood risk sites. [Also included under Policy E2]</p>



COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
<b>Policy E3: Retail Development</b>		
<p>EQ02 3. 6. "What is bad about Durham City Centre?"  "North Road (tawdry and dirty, run down, ASB focus, charity shops, poor introduction to City for visitors":  this is all too true, but alas it is not a novelty but has been true ever since I came to Durham in 1965.  I think part of the problem is that local politicians, of all shades, have regularly had unrealistic ambitions for Durham as a great shopping centre: there are improvements which might work (book shops, antique shops, etc., which one would expect to find in a city such as Durham but does not; but tact and guidance will be needed to achieve shopping developments which work for Durham and will succeed. Copied from Theme 6</p>	c2 Concern about North Road, & retail offer	Consider effects of policies on North Road. [Also included under Policy E4]
<p>Q33 Durham definitely needs more small, interesting shops for both residents &amp; the tourists. Fowler's Yard should be for that purpose not for finance and business services. ... Centre of York is a good example.</p>	c2 Role of Fowlers Yard addressed by policies E2, E3 & E4	Consider strengthening text re Fowlers Yard [Also included under Policies E2 and E4]
<p>Q35 I would like the Millennium Place economy to be more varied, eg a small bowling alley or roller/blade skating rink on the broad terrace below the main plaza.</p>	C5 Suggestion re Millennium Place, addressed in Policy E3 A) 2) and by Project 12	Consider text change to policy E3 wording and coverage in Project 12 [Also included under General]
<p>Q48  We need more shops, particularly a department store. Enclosed shopping malls are vital because of our awful weather.  A central recreation area providing e.g. indoor bowls, ice rink, bowling alley would be good for residents.</p>	C2 Need for more retail and leisure facilities. Addressed by policies E3 & E4 and Project 14 Visitors and Tourists	Consider Theme 3 policies re types of facilities [Also included in Policy E4]
<p>Q56 How do you restrict the inexorable spread of coffee shops, letting agencies / estate agents etc in what should be retail frontages?</p>	C2 Concern about retail provision	Consider if it is possible to strengthen the wording of policies E3 and E4 [Also included in Policy E4]
<p>Q57 Retail development is vital to Durham city. Durham is NOT a decent</p>	C2 concern regarding retail offer in	Consider if Theme 3 policies or text

<p>shopping centre. Residents and visitors do NOT come to Durham for shopping but go elsewhere to the bigger towns, cities and outlying shopping centres.</p> <p>Bigger shops are located outside the city at the Arncliffe Centre Dragonville Estate etc which limits the availability in the city.</p> <p>More smaller independent shops and businesses should be invited and encouraged to set up business in Durham which in turn would make the city more vibrant for shopping.</p>	<p>Durham and a need for more independent shops</p>	<p>could cover this issue [Also included under Policy E4]</p>
<p>Q57. More choice of leisure activities is welcome in the city. Previous developments have closed down the North Road cinema, ice rink, bowling alley, Aykley Heads sports centre etc.</p> <p>New cinema and bowling alley developments being built are welcome. BUT there are too many food outlets, drinking establishments, and hot food takeaway is. Residents and visitors also need open spaces to relax and enjoy.</p>	<p>C2. Concern about large number of takeaways, drinking establishments, etc.</p>	<p>Concern noted, see also comments from Q76, EQ04 and EQ15 Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way [Also included in Policy E4]</p>
<p>Q67 Please please please no more cafes! Residents need more than tea / beer / wine ...</p>	<p>C2 Concern about retail provision</p>	<p>Consider if it is possible to strengthen the wording of policies E3 and E4 [Also included in Policy E4]</p>
<p>Q76 E4. Concerned about the number of coffee shops etc and the lack of retail in the primary shopping areas. Can this be controlled.</p>	<p>C2. Concern about proliferation of coffee shops.</p>	<p>See also comments from respondents EQ04 and EQ15 Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way [Also included under Policy E4]</p>
<p>EQ22 With regards to E3.b.6 despite it being a desirable outcome I doubt how conceivable this will be as pavements and roads are far too narrow throughout the city but are bordered by buildings. I fail to see where the</p>	<p>C3 Objection to Policy E3.B) 6 to improve City Centre for pedestrians and cyclists as unrealistic because of</p>	<p>Consider whether change of Policy wording required in relationship with Theme 5</p>

space will be found. Copy to Theme 5 Transport Policy T2 Designing for Sustainable Transport	topography of medieval streets	
EQ23 E3 - I broadly agree but the City centre could provide more of the support infrastructure that the businesses Durham wants, and tourists, will demand. A small example: the lanes off Silver Street and Saddler Street are ill-lit dumping grounds that the Council does its best to maintain (Some students refer to the alley south of Cotswold to the moat as Murder Alley). In Seville, instead of these lanes being used for uses no-one wants, they are clean and tidy and have small restaurants and shops. Instead of being no-go zones they are actively sought out by tourists.	c2. Suggestions for uses of the Vennels	Consider how this could be covered by Theme 3 policies [Also included under Policy E4]
EQ54 The retail offer in Durham has been so dramatically reduced lately that it is necessary to drive to other towns to buy many things. Durham is in danger of not functioning as a County Town. The city needs a policy to get city centre shops all back in use. Copied from Other Comments	C3 Concern about reduction in retail offer	Consider coverage of Policy E3
Q68 Attachment Disabled Parking. Copied to Theme 5 The group [Durham City Access for All] has regular issues about the lack of disabled parking in the City. Disabled parking was removed from the market place when it was refurbished and has not been replaced elsewhere. For those wishing to worship or visit the Cathedral there are only a few disabled places at the rear of the Cathedral and these are often occupied by skips. Parking at the Palace Green is impossible. The University/Cathedral seem unwilling to help sort it out.	c2. Concern over lack of disabled parking in the City.	Consider coverage of this issue between Themes 3 and 5. And coverage in existing projects, or a new project.
WC103 The SRA [Sidegate Residents Association] is particularly concerned about North Road. We would like to see the Empty Shop studios above the bus station shops as a catalyst for the development of an arts area similar to Ouseburn. The Shakespeare Hall could also come into play. It is also the point of entry for people coming to the city from neighbouring villages by bus and must also offer the kind of shops they want to see. Charity shops have an important role to play in both meeting people's needs and in recycling goods.	c2. Suggestions for uses of North Rd, including positive role for charity shops. Addressed to some extent by Project 13.	Consider coverage of North Rd by Theme 3. And additions to Project 13. [Also included under general]

<p>WC218 Retail premises should not have external security blinds of the metal roller variety on front doors and/or windows.</p>	<p>c3. Suggestions re detailed design of shop frontages</p>	<p>Consider the level of detail possible in Policies E3 and E4. And cross reference to Theme 2a policies, particularly H2 and H3 [Also included in Policy E4]</p>
<p>L26 Draft policy E3 sets out the approach to retail development in the city centre and draft policy E4 outlines the acceptable use classes within the primary and secondary Frontages. The supporting text on page 73, however, include some broad opinions – for example paragraph 4.125 states '<i>at present there are too many food outlets (use classes a three) in the city, which has to decrease the overall retail attractiveness.</i>' We understand the neighbourhood plans ambition is to widen the offer of national and independent retailers centrally, we query whether this statement is based on any evidence. Indeed the food and drink sector plays an important role in the vitality and viability of Durham city centre, and adding to the diversity of uses, supporting increased dwell time and having a positive impact on economic activity. As such, we consider that greater value should be given to the role of mixed offers – e.g. A1, A2 and A3 – and policies E3 and E4 could be home full if they are overly restrictive.</p>	<p>C3 c5 comment concerning the acceptable uses for primary and secondary frontages and questioning the evidence for the paragraph 4.125 regarding too many food and drink outlets</p>	<p>Consider change for wording for Policy E3 and supporting text [Also included under Policy E4]</p>

COMMENTS TO PRE-SUBMISSION CONSULTATION DRAFT	COMMENT CATEGORISATION	PLANNING ISSUE OR ACTION TO BE CONSIDERED
<b>Policy E4: Primary and Secondary Frontages</b>		
<p>EQ02 3. 6. "What is bad about Durham City Centre?"  "North Road (tawdry and dirty, run down, ASB focus, charity shops, poor introduction to City for visitors":  this is all too true, but alas it is not a novelty but has been true ever since I came to Durham in 1965.  I think part of the problem is that local politicians, of all shades, have regularly had unrealistic ambitions for Durham as a great shopping centre: there are improvements which might work (book shops, antique shops, etc., which one would expect to find in a city such as Durham but does not; but tact and guidance will be needed to achieve shopping developments which work for Durham and will succeed. Copied from Theme 6</p>	c2 Concern about North Road, & retail offer	Consider effects of policies on North Road. [Also included under Policy E3]
Q04 Just answered ? Number 3. as I disagree due to the fact that I don't quite know what primary and secondary fronts are and what the difference between the primary and the secondary	c5 Concern about clarification and explanation of Primary and Secondary frontages in text supporting Policy E4	Consider change to text under policy E4
Q19. E4. Not too many more bars, clubs, & estate agents etc. - not attractive to residents or visitors. Need museums & places to go that are not cafes & bars. Durham used to be a place to shop – not now.	C2 Suggestion to broaden the retail offer including culture and the arts	Though decisions about individual establishments are outside remit, consider if Theme 3 and Theme 6 policies can address the imbalance in the types of commercial activities in the City in some way [Also covered in General]
Q33 Durham definitely needs more small, interesting shops for both residents & the tourists. Fowler's Yard should be for that purpose not for finance and business services. ... Centre of York is a good example.	c2 Role of Fowlers Yard addressed by policies E2, E3 & E4	Consider strengthening text re Fowlers Yard [Also included under Policies E2 and E3]
Q35 I agree with all but I would like lower Claypath included by name – in 4.97 upgrading & in policies re primary & secondary frontages (with emphasis on Policy E4.4).	C5 Suggestion of text change to include Lower Claypath in paragraph 4.97 and E4.4	Consider text change to policy E4.4 wording [Also included under General]

<p>Q48 We need more shops, particularly a department store. Enclosed shopping malls are vital because of our awful weather. A central recreation area providing e.g. indoor bowls, ice rink, bowling alley would be good for residents.</p>	<p>C2 Need for more retail and leisure facilities. Addressed by policies E3 &amp; E4 and Project 14 Visitors and Tourists</p>	<p>Consider Theme 3 policies re types of facilities [Also included in Policy E3]</p>
<p>Q56 How do you restrict the inexorable spread of coffee shops, letting agencies / estate agents etc in what should be retail frontages?</p>	<p>C2 Concern about retail provision</p>	<p>Consider if it is possible to strengthen the wording of policies E3 and E4 [Also included in Policy E3]</p>
<p>Q57 Retail development is vital to Durham city. Durham is NOT a decent shopping centre. Residents and visitors do NOT come to Durham for shopping but go elsewhere to the bigger towns, cities and outlying shopping centres. Bigger shops are located outside the city at the Arniston Centre Dragonville Estate etc which limits the availability in the city. More smaller independent shops and businesses should be invited and encouraged to set up business in Durham which in turn would make the city more vibrant for shopping.</p>	<p>C2 concern regarding retail offer in Durham and a need for more independent shops</p>	<p>Consider if Theme 3 policies or text could cover this issue [Also included under Policy E3]</p>
<p>Q57. More choice of leisure activities is welcome in the city. Previous developments have closed down the North Road cinema, ice rink, bowling alley, Aykley Heads sports centre etc. New cinema and bowling alley developments being built are welcome. BUT there are too many food outlets, drinking establishments, and hot food takeaway is. Residents and visitors also need open spaces to relax and enjoy.</p>	<p>C2. Concern about large number of takeaways, drinking establishments, etc.</p>	<p>Concern noted, see also comments from Q76, EQ04 and EQ15 Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way [Also included in Policy E3]</p>
<p>Q67 Please please please no more cafes! Residents need more than tea / beer / wine ...</p>	<p>C2 Concern about retail provision</p>	<p>Consider if it is possible to strengthen the wording of policies E3 and E4 [Also included in Policy E3]</p>
<p>EQ43. Re: Policy E4.4 Decisions regarding other proposed uses - those not</p>	<p>C3 concern regarding lack of retail</p>	<p>Consider change of wording in</p>

<p>included in the definition of appropriate to a town centre - should account for impact on proportion of available space for appropriate uses. The lack of available space for appropriate use in the secondary frontage spaces within the centre creates affordability issues. This has an impact on the ability of the city to generate the number of businesses required for a critical mass of reasons to visit.</p>	<p>space for appropriate uses for a town centre may discourage some businesses</p>	<p>Policy E4</p>
<p>Q35 I agree with all but I would like lower Claypath included by name – in 4.97 upgrading &amp; in policies re primary &amp; secondary frontages (with emphasis on Policy E4.4).</p>	<p>c5. Suggestion for change of wording in paragraph 4.97 to include Claypath</p>	<p>Suggest change in text in paragraph 4.97 to include Claypath</p>
<p>Q57 Retail development is vital to Durham city. Durham is NOT a decent shopping centre. Residents and visitors do NOT come to Durham for shopping but go elsewhere to the bigger towns, cities and outlying shopping centres. Bigger shops are located outside the city at the Arniston Centre Dragonville Estate etc which limits the availability in the city. More smaller independent shops and businesses should be invited and encouraged to set up business in Durham which in turn would make the city more vibrant for shopping.</p>	<p>C2 concern regarding retail offer in Durham and a need for more independent shops</p>	<p>Consider if Theme 3 policies or text could cover this issue [Also included under Policy E3]</p>
<p>Q76 E4. Concerned about the number of coffee shops etc and the lack of retail in the primary shopping areas. Can this be controlled.</p>	<p>C2. Concern about proliferation of coffee shops.</p>	<p>See also comments from respondents EQ04 and EQ15 Though decisions about individual establishments are outside remit, consider if Theme 3 policies can address the imbalance in the types of commercial activities in the City in some way [Also included under Policy E3]</p>
<p>EQ23 E3 - I broadly agree but the City centre could provide more of the support infrastructure that the businesses Durham wants, and tourists, will demand. A small example: the lanes off Silver Street and Saddler Street are ill-lit dumping grounds that the Council does its best to maintain (Some students refer to the alley south of Cotswold to the moat as Murder Alley). In Seville, instead of these lanes being used for uses no-one wants, they are clean and tidy and have small restaurants and shops. Instead of being no-go</p>	<p>c2. Suggestions for uses of the Vennels</p>	<p>Consider how this could be covered by Theme 3 policies [Also included under Policy E3]</p>

zones they are actively sought out by tourists.		
<p>WC116 I agree with the SRA [Sidegate Residents Association] that the North Road is a particular area of concern. A lively retail sector here could support arts and heritage premises which would form a suitable entry point to the city. The conversion of Milburngate / the Gates from primarily retail use to residential, with retail provision taking a second place, breaks the flow of customers from the Market Place, and care will be needed to encourage shoppers past this 'natural break' (in both directions). The same is true of the foot of Claypath, where the existing difficulty of encouraging shoppers up the hill has been exacerbated by the construction of Millennium Place, and by the abandonment of the designation of lower Claypath as retail.</p>	<p>c2. Suggestions for uses of North Rd. Addressed to some extent by Project 13.</p> <p>C2. Concern about lower Claypath.</p>	<p>Consider coverage of North Rd by Policy E4. And additions to Project 13. [Also included in General]</p> <p>Consider coverage of lower Claypath by Policy E4</p>
<p>WC218 Retail premises should not have external security blinds of the metal roller variety on front doors and/or windows.</p> <p>L9b Part A the county council is extremely concerned that the Plan redefines the town centre boundaries alongside retail frontages which are contrary to evidence within the Council's Retail and Town Centre Study. Particular concerns relate to the defined Primary Frontage which significantly extends this area from that recommended within the Retail and Town Centre Study. The policy identifies that the Primary Frontage should be in mainly retail use. Further clarification is required in relation to the word 'mainly' in terms of the application of the policy. Further to this another significant concern is whilst the intended aim may be to encourage retail development and uses into these areas, and also acknowledging E4.2, extending the extent of this area could potentially restrict non retail town center uses coming forward that could offer vibrancy and vitality to the</p>	<p>c3. Suggestions re detailed design of shop frontages</p> <p>c2. Concern about the areas included within the frontages.</p>	<p>Consider the level of detail possible in Policies E3 and E4. And cross reference to Theme 2a policies, particularly H2 and H3 [Also included in Policy E3]</p> <p>Discuss with Council</p>



City Centre. Given the acknowledgement that retail development is 'leisure led development' (para 4.126), the policy could act as a barrier to future investment within large areas of the city centre.

The county council urges that the following areas, in particular, defined as Primary Frontage to be reconsidered:

The Gates/Riverwalk: The redevelopment of the site (currently under construction) is a leisure led development (cinema and restaurants) alongside student accommodation. The character of this area will no longer be retail and therefore the county council is concerned that designating the whole of this area as Primary Frontage would not correctly reflect it. The county council therefore considers that the northern area of the site which is to incorporate the cinema and A3 uses should be removed from the Primary Frontage.

Milburngate: This area of the city centre has historically never been in retail use and as the county council has granted planning permission (subject to a legal agreement) for a scheme that will incorporate leisure, office and residential elements, it is therefore not considered appropriate to define the area within the Primary Frontage.

North Road: This area of the city centre has historically been secondary frontage which reflects the nature of the offer. Given the acknowledgement within the Plan that North Road should be 'upgraded' (para 4.97), the county council is concerned that such a restrictive policy approach may act as a barrier to new development coming forward.

Further to this, the county council is concerned that other areas that have been redefined as Primary Frontage are not based on evidence and are not reflective of the nature of uses found within these areas.

Part B the county council is concerned that the policy reads as if all the criteria need to be conformed to by the use of the word 'and'. For certain developments, certain criteria may not be applicable or achievable.

L9 b

<p>E4.1 The county council is concerned that this element of the policy does not provide a workable criteria for assessment. It is not possible to specify particular types of shop within the A1 Use Class and therefore a judgement on a proposal that will improve the range of shops cannot be made. It is urged that this element of the policy is reconsidered or removed.</p>	<p>c2. Concern about E4.1 and E4.2</p>	<p>Discuss with Council</p>
<p>E4.2 The county council is concerned as to how such non-retail uses will be assessed in relation to adding vitality and viability to the City Centre.</p>	<p>C2 objection to Policy E4 and allocation of Primary frontage at Millburngate development site as defined in Map 9 of Retail areas</p>	<p>Reconsider primary and secondary frontage designation.</p>
<p>L19 Millburngate has been included as a primary shopping frontage. Primary shopping advantages generally include a high proportion of class a one retail uses where a secondary shopping frontages provide greater opportunities for a diversity of Town center uses. The approved scheme for the mixed use development at Millburngate only allows for a small amount of class a one retail floor space. Therefore the site should not be allocated for retail in the primary shopping frontage. The development is more akin to a secondary shopping frontage and the allocation should be amended to reflect this.</p>	<p>C3 c5 comment concerning the acceptable uses for primary and secondary frontages and questioning the evidence for the paragraph 4.125 regarding too many food and drink outlets</p>	<p>Consider change for wording for Policy E3 and supporting text [Also included under Policy E3]</p>
<p>L26 Draft policy E3 sets out the approach to retail development in the city centre and draft policy E4 outlines the acceptable use classes within the primary and secondary Frontages. The supporting text on page 73, however, include some broad opinions – for example paragraph 4.125 states '<i>at present there are too many food outlets (use classes a three) in the city, which has to decrease the overall retail attractiveness.</i>' We understand the neighbourhood plans ambition is to widen the offer of national and independent retailers centrally, we query whether this statement is based on any evidence. Indeed the food and drink sector plays an important role in the vitality and viability of Durham city centre, and adding to the diversity of uses, supporting increased dwell time and having a positive impact on economic activity. As such, we consider that greater value should be given to the role of mixed offers – e.g. A1, A2 and A3 – and policies E3 and E4 could be home full if they are overly restrictive.</p>	<p>L26</p>	<p>L26</p>

<p>The primary frontages identified on map 9 comprise a relatively large area and go beyond what could reasonably be defined as such (Having regard to the definition set out in Annex two of the NPPF). Indeed there are areas within both a defined Primary and Secondary frontages which in our view, it should not form part of these areas at all – not least as they do not provide any traditional street frontages and/or contain any significant proportion of retail uses. As such we suggest consideration is given to NPPF paragraph 23 and the primary shopping area and primary and secondary frontages definitions, set out in Annex two (glossary) on page 55, to ensure consistency with national policy.</p>	<p>C2 Objection to defining a large area of Primary Frontage</p>	<p>Objection noted and reconsider the Primary Frontage area as defined in Map 9</p>
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