

# THE CITY OF DURHAM TRUST

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Phone (0191) 386 2595  
Email: [chair@durhamcity.org](mailto:chair@durhamcity.org)  
Web site: <http://www.DurhamCity.org>

c/o Blackett, Hart & Pratt, LLP  
Aire House  
Mandale Business Park  
Belmont  
Durham, DH1 1TH  
5 July 2021

## **DM/21/01789/FPA: Housing at St John's Road**

Dear Ms Morina

The City of Durham Trust objects strongly to the proposal to build 12 town houses on the site of the former Shell petrol station. We fully endorse the many well argued objections from local residents, including that from Councillor Brown who is also one of our trustees.

The applicant's *Heritage Statement* claims that "The quantum of development and layout has been informed by the character of St John's Road and more recent developments to the west beyond the boundary of the Conservation Area." (6.28) However, the reality is that it has been informed only by the "more recent developments to the west beyond the boundary of the Conservation Area" and it is completely out of character with St John's Road which is within the Conservation Area. As such the proposal fails against Policy 44 of the *County Durham Plan (CDP)* and Policy H2 of the *Durham City Neighbourhood Plan (DCNP)*.

The applicant's *Financial Viability Report* argues that the development of the site would be unviable with fewer than 12 houses and even with that number it cannot meet the requirements to provide a proportion of affordable housing and housing suitable for older and disabled persons. The proposals thus fail to meet the requirements of Policy 15 of the *CDP* and Policies D2 and D3 of the *DCNP*. Financial viability must not be a key determinant of housing design and density.

A further seriously problematic aspect of the proposal is the fact that it provides access from both the A167 and St John's Road, thus inevitably creating a through-route. This is clearly contrary to Policy T1 of the *DCNP*. This states that "New access roads and residential streets, and alterations to existing ones, should include, where appropriate...b) measures to ...exclude through-routes for motor vehicles." It is clearly appropriate, indeed necessary, to include such measures in this case as St John's Road is a quiet residential street and the area is used heavily by pupils walking to and from the three schools in the locality.

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The Trust would very much like to see an appropriate housing development on this redundant site, but the current proposal is not fit for purpose and should be rejected completely. I have attached below an Appendix setting out in more detail our views on design and heritage weaknesses of the application.

Yours sincerely

John Lowe  
Chair, City of Durham Trust

## **APPENDIX: Design/Heritage Comments**

### **Context**

The site lies within the City Centre Conservation Area and the Durham City Neighbourhood Plan Area. Policies relating to these apply. The area forming the character area that should be the main determinant of impact is St John's Road rather than the A167 and the development on the far side of it that is outside the conservation area. This is of relative low density at the cul de sac head and a mix of terraced houses on the earlier part of the street. The Victorian and Edwardian buildings are a strong character element and the modern buildings contribute because of their low profile and landscaped gardens. This is recognised in Durham County Council's *Strategic Housing Land Availability Assessment* (2018) that identified scope for six units.

### **Application**

In proposing to double the recognised number of units on the site the development will reduce the scope for landscaping. Coupled with their height (three storeys with extensive roof accommodation) this will become dominant on the street and discordant with the two existing patterns of development. The impact is further heightened by the design styling. This bears little resemblance to the examples shown on the applicant's *Design and Access Statement* by consisting of over simple repetitive units with no sensitivity for the street character.

The result will be to create negative impact on the street character and conservation area, removing landscaping and reducing space for replacement. The mass is higher and greater than the street character and design is overly simple creating large unrelieved blocks.

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## Policies

The proposals fail against the following Policies:

### *County Durham Plan*

#### **Policy 44 - Historic Environment - Conservation Areas**

f. The proposals fail to demonstrate understanding of the significance, character, appearance and setting of the conservation area and how this has informed proposals to achieve high quality sustainable development, which is respectful of historic interest, local distinctiveness and

h. The proposals fail to respect and reinforce the established, positive characteristics of the area in terms of appropriate design (including pattern, layout, density, massing, features, height, form, and detailing).

### *Durham City Neighbourhood Plan*

#### **Policy S1: Sustainable Development Requirements of all Development Conservation, preservation and enhancement of Our Neighbourhood:**

c) The proposals fail to harmonise with their context in terms of scale, layout, density, massing, height, and soft landscaping.

d) The Proposals fail to conserve the significance of the setting, character, local distinctiveness, tranquillity and the contribution made to the sense of place by the immediate neighbourhood's non-designated heritage assets;

#### **Policy H2: The Conservation Areas - Durham City Conservation Area**

a) The proposals fail to sustain and enhance the historic and architectural qualities of buildings.

b) They fail to sustain and enhance street patterns, boundary treatments, and roofscape.

i) The fail to have appropriate scale, density, massing, form, layout, landscaping and open spaces.

j) They fail by having, detailing inappropriate to the vernacular, context and setting.

k) They fail to use high quality design sympathetic to the character and context of the local area and its significance and distinctiveness