

THE CITY OF DURHAM TRUST

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DM/21/02360/FPA: Sniperley Park

Dear Mr Jones

The City of Durham Trust has already written to object to the fact that this application has been submitted and validated prior to the agreement with Durham County Council of a masterplan for the whole site (H5) as required by Policy 5 of the *County Durham Plan* (CDP).

It is important to remember that masterplanning is a long-standing spatial policy of the County Council. The October 2013 Pre-Submission Draft states: "It is envisaged that due to the size of these sites, they will be developed by consortiums of builders, each providing differing products at locations within the scheme at the same time, working to an **overall masterplan**." (Emphasis added)

However, in case the Council should choose to ignore its own long-standing policy, incorporated in Policy 5 of the recently adopted CDP, and consider this application in isolation from any masterplan, the Trust has identified the following list of NPPF and CDP policies against which we judge the application must fail and be refused.

National Planning Policy Framework – 2021

Section 2 - Achieving sustainable Development (General requirements, determined by local plans and planning submissions)

- b) A social objective** - well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being;
- c) An environmental objective** –protect and enhance our natural, built and historic environment; mitigating and adapting to climate change, including moving to a low carbon economy.

Section 8 - Promoting healthy and safe communities

- a)** That promote social interaction,
- b)** That are safe and accessible
- c)** That enable and support healthy lifestyles

Para 93. To provide the social, recreational and cultural facilities and services the community needs.

- a)** By planning positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments;
- b)** By taking into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- e)** By ensuring an integrated approach to considering the location of housing, economic uses and community facilities and services.

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Para 95. Ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.

Section 9. Promoting sustainable transport

Para. 104.

- a) Addressing the potential impacts of development on transport networks;
- c) Ensuring opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) Ensuring the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including avoiding and mitigating any adverse effects,
- e) Ensuring that patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places

Para 110

- a) Ensuring that appropriate opportunities to promote sustainable transport modes have been taken up.
- b) Ensuring safe and suitable access to the site can be achieved for all users;
- c) Ensuring that the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code,
- d) Ensuring that any significant impacts from the development on the transport network in terms of capacity and congestion or on highway safety are mitigated

Para 112.

- a) Give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second to facilitate access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services.
- b) Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- e) Be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Section 12. Achieving well-designed places

Para 130. Ensure that the development:

- a) Will function well and add to the overall quality of the area over the short term and the lifetime of the development;
- b) Is visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- c) Is sympathetic to local character and history.
- d) Will establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- e) Will optimise the potential of the site support local facilities and transport networks.

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f) Will create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users

Para 131 – Ensure tree lined streets

Para 132 – Effective engagement with the community to ensure design quality

Section 16. Conserving and enhancing the historic environment

Proposals affecting heritage assets - Para 197

a) Ensure that the significance of heritage assets is sustained and enhanced

County Durham Plan

Policy 5 Durham City's Sustainable Urban Extensions

b. Ensure the provision of a new primary school

d. Provide a surface and foul water drainage management plan incorporating SuDS with no further water draining into the Blackdene Burn.

e. Ensure that the design of development in the vicinity of Sniperley Hall and Farm will have regard to their character and setting, and the recognition of the area as an Historic Park and Garden of Local Interest, including through the provision of public open space and the use of reduced housing densities

g. Ensure the overall provision of a linear park through the centre of the site. from Folly Plantation in the north, through to the parklands of Sniperley Hall -including a network of footpaths and cycleways linking housing with the local centre, wider countryside. Incorporate the mature woodlands and tree groups of Sniperley Park, maintaining the relationship of the Hall with land to the north and with Sniperley Farm, having regard to their setting.

i. The development must be connected to the existing development to the east of the A167 through suitable, convenient, safe and attractive cycleways and footpaths;

k. Ensure that there are no unacceptable impacts on highway safety or severe residual cumulative impacts on the wider road and agree details of on and off-site highway works and improvements as part of the comprehensive masterplan. These works shall include,

- capacity improvements along the A167 corridor from Neville's Cross to Sniperley, including improvements to Sniperley Roundabout.
- a new link between the B6532 and the A167 park and ride roundabout;

A contribution is required to delivering sustainable transport in accordance with policies 21) and 22 (Durham City Transport)

Policy 21 Delivering Sustainable Transport

Ensure that the development will sustainable transport by:

a. delivering, accommodating and facilitating investment in safe sustainable modes of transport in order of priority: those with mobility issues or disabilities, walking, cycling, bus and rail transport, car sharing and alternative fuel vehicles;

b. providing appropriate, well designed, permeable and direct routes for walking, cycling and bus access, so that new developments clearly link to existing services and facilities together with existing routes for the convenience of all users;

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- c. ensuring that any vehicular traffic generated by new development, following the implementation of sustainable transport measures, can be safely accommodated on the local and strategic highway network and does not cause an unacceptable increase in congestion or air pollution and that severe congestion can be overcome by appropriate transport improvements;
 - d. ensuring the creation of new or improvements to existing routes and facilities do not cause unacceptable harm to the natural, built or historic environment.
- and ensure; the appropriate provision for electric vehicle charging, including charge points and laying of cables

Policy 29 Sustainable Design

Ensure that the development

- a. Contributes positively to the area's character, identity, heritage significance, townscape and landscape features, and helps to create and reinforce locally distinctive and sustainable communities;
- c. Minimises greenhouse gas emissions, by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation,
- g. Respond creatively to topography and to existing features of landscape or heritage interest and wildlife habitats;
- h. Respects and takes opportunities to create attractive views of and from the site;
- k. As edge of settlement development, provide for structural landscaping to screen or assimilate the development into its surroundings and provide an attractive new settlement boundary.

Places and Spaces - Ensure that the development:

- m. Creates a well-defined, easily navigable and accessible network of streets and spaces which respond appropriately to local context, to ensure that:
 1. The public realm is designed to be functional, well-managed safe and durable, taking into account the lifetime needs of its users;
 2. Convenient access is provided for all users whilst prioritising the needs of pedestrians, cyclists, public transport users, people with a range of disabilities, and, emergency and service vehicles;
 3. That connections are made to existing cycle and pedestrian networks;
 4. That the public realm benefits from natural surveillance;
 5. Amenity open space is designed with regard to the local micro-climate including sunlight, shade and shelter; and
 6. Communal amenity space is well-defined, defensible and appropriate in its design, size and location to the needs of its users.

Policy 44 Historic Environment

Confirm that the development will sustain the significance of non-designated heritage assets and their setting. Ensure that the development proposals will contribute positively to and enhance the built and historic environment.

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This application for just a part of CDP site H5 comprehensively fails the above national and local planning policies and should be refused. The Trust emphasises that no attempts to meet the above specific policy requirements on just one fifth of the site can overcome the fundamental issue that CDP Policy 5 requires a comprehensive masterplan for the whole of the Sniperley Park site.

Yours sincerely,

John Lowe
Chair, City of Durham Trust