

THE CITY OF DURHAM TRUST

c/o Blackett, Hart & Pratt, LLP
Aire House
Mandale Business Park
Belmont
Durham, DH1 1TH
4 January 2022

Web site: <http://www.DurhamCity.org>

Dear Mr Jones,

DM/21/03706/FPA Sniperley Farm Durham DH1 5RA

Conversion of existing buildings to form 4 residential units (Use Class C3)

The City of Durham Trust objects strongly to this application, not least because of its submission prior to the approval by Durham County Council of the comprehensive masterplan for the whole of the Sniperley Park site. This is currently under consultation. The application also fails to integrate with the previously submitted proposals for the Bellway ownership and is a significant failure in masterplanning and against a range of other policy requirements. It fails to have any relationship to the County Council's proposed masterplan.

Context

The Farm is a non-designated heritage asset. The proposal inappropriately divides the farm buildings from the surrounding development leading to a complete failure to realise the potential of the farm as a key asset in developing distinctiveness within the Sniperley urban extension. It fails to make any additional contribution to the overall Sniperley development - clearly needed for a development of this size. It is an extremely limited exercise in basic conversion of buildings. The Design Code submitted for the Bellway development includes the farm buildings and is completely inadequate as a code. It is simply a designation of areas of house types and materials for only part of the urban extension.

Masterplan

The proposal is clearly in breach of Policy 5 of the *County Durham Plan (CDP)* which states:

"Development is required to be comprehensively masterplanned and to demonstrate how the phasing of development on these sites will have regard to the provision and timing of the infrastructure and services necessary to support them."

Policy 4 of the CDP defines the Sniperley Park allocation (H5) as consisting of 107.8 Ha and providing 1,700 dwellings. This application covers just the farm buildings - it is a small fraction of the full allocation and of even the previous Bellway submission (*DM/21/02360/FPA Sniperley Park*).

This failure to meet the requirements of Policy 5 is even greater when we consider that the policy text itself goes into considerable detail about the contents of the essential masterplan. These are set out in sub-paragraphs a – l of Policy 5. The Policy 5 supporting text was amended because of Main Modifications required by the inspector following the Examination in Public only last year. Particular requirements this proposal fails against are:

THE CITY OF DURHAM TRUST

- e. Sensitivity to Sniperley Hall and Farm through the provision of public open space, reduced housing densities and the retention of woodlands;
- g. A linear park through the centre of the site (something that Policy 5 describes in detail in the words of the inspector's modification MM48 – the farm is part of this).

It could not be clearer that such a comprehensive masterplan is required before any particular planning application can be considered. Consequently, this application is self-evidently premature as well as being contrary to policy in similar ways to the original Bellway application. If the applicant cannot be persuaded to withdraw this application, the Trust strongly urges the County Council to refuse it because of its lack of compliance with the very specific requirements of Policy 5 the Durham County Plan. It is difficult to see how any appeal against refusal on such grounds could succeed.

Other Policy Failures

However, if the Council chooses to ignore its own recently adopted policy by considering this application in isolation from any masterplan, the application must be regarded as failing against the following list of NPPF and CDP policies.

National Planning Policy Framework – 2021 issue.

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.

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;

THE CITY OF DURHAM TRUST

- 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 (to) support local facilities and transport networks.

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

- 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.

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;
- 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.

Policy 44 Historic Environment

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

For the reasons above the Trust objects to this application.

Yours sincerely,

John Lowe,

Chair, City of Durham Trust