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

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22 December 2025

Ms Michelle Hurton
County Council Planning Development
PO BOX 274
Stanley
County Durham
DH8 1HG

Dear Ms Hurton,

DM/25/02948/OUT: Outline application with all matters reserved except access for residential development of up to 45no dwellings (Class C3), land to the north of Witton Grove, Framwellgate Moor, Durham DH1 5AB

The proposal is for the development of up to 45 dwellings on land located between Witton Grove and the Sniperley park-and-ride facility.

The Trust has two main concerns about the proposal: the site is in the green belt, and the proposed access is in a difficult location.

Green Belt

The County Durham Plan applies the national policy on green belts, essentially that almost all forms of development are inappropriate, that very special circumstances need to be demonstrated to justify development, but that in certain circumstances a site within the green belt may be classified as 'grey belt' within which development might be allowed if it meets 'golden rules' for achieving an enhanced level of affordable housing, necessary improvements to local or national infrastructure, and the provision of green spaces accessible to the public.

The outline application is accompanied by a Planning and Sustainability report that addresses many of the relevant considerations for this green belt location. The Trust acknowledges the assertions about the site qualifying as grey belt, and about meeting the golden rules. However, we consider that assaults on the green belt around Durham city and the history of approved schemes on controversial grounds that have nibbled away at the green belt mean that the utmost vigilance and indeed scepticism should be applied in all cases, including this one.

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Furthermore, NPPF Paragraph 155 c regarding 'grey belt' considerations states that “**The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.**”

In turn, Paragraph 115(d) requires that “**any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.**”

For the reasons put forward later in this letter, the Trust considers that the proposed development does not take account sufficiently of the hazardous movements of traffic into and out of the proposed access point and the nearby location of the roundabouts. This creates a highway safety issue and there is no vision-led approach to mitigation demonstrated to satisfy the terms by which 'grey belt' approval may be acceptable.

The Planning Authority should, we believe, examine with the greatest rigour whether this outline proposal truly meets all the green belt/grey belt tests set by national policy as enshrined in the latest NPPF, backed by Policy 20 of the County Durham Plan. If in any respect it does not completely satisfy every criterion then it should be refused.

Access

The proposed access is the only aspect of the proposed development for which detail is formally provided. The plans show an access road at the position of the long-established farmland access, a right-angle turn directly off the major A691 road into Durham city and only 50 metres from the A691's exit from the Sniperley Park and Ride roundabout. The applicant's Planning and Sustainability report

Vehicles naturally accelerate away from roundabouts and here would encounter traffic attempting to enter the proposed development at the extremely tight corner proposed in the detailed drawings. Larger vehicles such as Council refuse collection vehicle will necessarily take the proposed corner even more carefully and therefore even slower. Similarly, vehicles exiting the proposed housing estate will pose a hazard, especially if they attempt to turn right across the flow of traffic accelerating away from the roundabout.

The applicant's Planning and Sustainability report states that “*vehicular access would be via a simple junction onto A161 along the western boundary. This provides safe and acceptable visibility from the site onto A161 appropriate for the observed vehicle speeds and in full accordance with current highway design guidance.*” Road A161 runs from Goole to Gainsborough, west of Doncaster, but in any case the Trust considers that the detailed access road proposal is inherently unsatisfactory and unsafe. A different access solution is required to accord with CDP Policy 24(c) to “make safe and proper provision for all users which prioritises the movement of pedestrians, cyclists and public transport”.

Conclusions

The proposal lies in the Durham city Green Belt and should be refused unless in all respects it satisfies every criterion of **CDP Policy 20** and the **NPPF**. It should in any case be refused as the proposed access fails to make safe and proper provision for all users in the terms of **CDP Policy 24(c)**.

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Yours sincerely

Sue Childs

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