THE CITY OF DURHAM TRUST

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

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29 October 2026

Ms Emma Price,
Durham County Council Planning Development
PO BOX 274
Stanley
County Durham
DH8 1HG

Dear Ms Price,

DM/26/01846/FPA Land West of Flass Vale Hall Newcastle Road Crossgate Moor Durham DH1 4HR

Construction of 1no. self-build dwelling

The Trust set out its objection in its previous letter of the 20th of August and maintains its position. Responses are now available from Durham County Council's Design and Conservation and Planning Policy sections plus additional supporting evidence from the applicant. The Trust wishes to reinforce its comments in view of these because of great concern stemming from the Council responses.

Whilst this is an application for one house, the principles involved in determining it will have very substantial ramifications for dealing with smaller sites in the Green Belt, the working definition of Grey Belt and ultimately failure to adequately protect the Green Belt.

Small Sites - Both Council responses substantially weaken adequate defence of this application site, being overly fixated on the small and contained nature of the site. The Design and Conservation response correctly identifies the site's *'part of the wider landscape character of Flass Vale'.* Unfortunately, it then contradicts itself by describing the site as *'well contained from surrounding visual receptors'.* This ignores the Green Belt and intrinsic landscape value by concentrating on key viewpoints only. This is to be misled by the small size of the plot and its tree containment. Under this limited approach, development on almost any small site in the green belt could be assessed as having limited impact. Contemporary design proposals do not compensate for the failures caused by only adopting this method. The Planning Policy response ultimately fails by also being unduly led by both containment and small size. It reduces the value of the site against Purposes A and D of a Green Belt '*when assessed in isolation'.*

The point that the Trust wishes to make can be illustrated by a question: when does the impact on a Green Belt become a concerning factor when dealing with small sites? Should the first small site be ignored, the next nearby, three sites, or more?

All Green Belts are mosaics; in the surrounds of this site, it is relatively small in grain. However, cherry picking such a site and then reducing its value by size or containment alone is always going to underestimate its significance by failing to recognise it as part of that mosaic and interdependent with its surrounds. In this instance, the Fernhill site has already been lost to proposed development, while this site plan shows another vehicle access onto the adjacent plot (opening up the possibility of a further application) and two nearby sites have been put forward for assessment of development under the forthcoming County Durham Plan revision. The Trust's question is not rhetorical; it is the *de facto* situation facing this important part of Durham's setting.

Grey Belt -The Trust has stated its case as to why the site is conclusively not Grey Belt, even using some of the applicant's submitted assessments. This is why the conclusion of the Planning Policy response is so concerning when it states that '*there is a reasonable basis for concluding that the site is capable of meeting the definition of Grey Belt*'. This is simply not the case. It is not previously developed land and contributes strongly to Purposes A and D as a small unbuilt part of a greater whole. Surely this site does not accord with the underlying principles of seeking to identify poor quality land in the Green Belt for development?

Green Infrastructure - Ultimately the County Council should be seen as the upholder of its own definitions of Green Belt. The Trust draws attention to the case of Exeter, a city with a historic core and based on a river, where green wedges like Flass Vale extend from the countryside surrounds into the City and have been formalised as spatial planning policy for over 50 years. Flass Vale is long overdue this recognition and protection, and piecemeal attempts to unpick it as valuable green infrastructure extending into the City should be resisted no matter how small. Recognition is offered by the Green Belt designation, but this is generalised and, as proven, open to piecemeal approvals of development. The Durham City Neighbourhood Plan does refer to the problem of edges of Flass Vale being eroded by additional development. In this instance the neck of the green wedge at the A167 is quite narrow and the value of this small application site should be recognised. It will extend the school and Flass Hall developed area intrusively into Flass Vale.

The Trust also dismisses the additional applicant's points as being not relevant to the central principles of this application's assessment.

Accordingly, the Trust maintains its objection to this application with the addition of the comments above.

Yours sincerely

Allan Gemmill
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