

COMMITTEE REPORT

APPLICATION DETAILS

APPLICATION No:	DM/21/02945/FPA
FULL APPLICATION DESCRIPTION:	Change of use of 2-bed C3 (dwelling) to a 4-bed C4 (HMO) with external and Internal alteration.
NAME OF APPLICANT:	Mr Phil Mckay
ADDRESS:	1 Newcastle Terrace, Framwellgate Moor, Durham, DH1 5EG
ELECTORAL DIVISION:	Framwellgate
CASE OFFICER:	Leigh Dalby (Senior Planning Officer) Tel: 03000 261 959 Email: leigh.dalby@durham.gov.uk

DESCRIPTION OF THE SITE AND PROPOSALS

The Site

1. The application site is an end of terrace property located within the Framwellgate Moor area of Durham City.
2. The application site is primarily surrounded by residential properties although the eastern boundary of the site is adjacent to the rear of a number of commercial premises.

The Proposal

3. Planning permission is sought for the change of use of the property from a dwelling (use class C3) to a small HMO (C4) with external alterations to remove an existing window and install 2no. new windows to the 1st floor front elevation.
4. The proposal includes internal alterations to create a bedroom to the ground floor, and a new bathroom on the first floor.
5. The application is reported to Planning Committee at the request of Framwellgate Moor Parish Council due to concerns that a HMO at this location will have an adverse impact on the area and parking.

PLANNING HISTORY

6. The property was subject to an enforcement complaint in January 2021 which claimed the premises was in use as a HMO. An investigation found that this was not the case and the dwelling remained in C3 use. The case was closed accordingly on 29 January 2021 as no breach of planning control had occurred.

PLANNING POLICY

NATIONAL POLICY

7. The following elements of the National Planning Policy Framework (NPPF) are considered relevant to this proposal:
8. NPPF Part 2 Achieving Sustainable Development - The purpose of the planning system is to contribute to the achievement of sustainable development and therefore at the heart of the NPPF is a presumption in favour of sustainable development. It defines the role of planning in achieving sustainable development under three overarching objectives - economic, social and environmental, which are interdependent and need to be pursued in mutually supportive ways. The application of the presumption in favour of sustainable development for plan-making and decision-taking is outlined.
9. NPPF Part 4 Decision-Making - Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available, including brownfield registers and permission in principle, and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of the area. Decision-makers at every level should seek to approve applications for sustainable development where possible.
10. NPPF Part 5 Delivering a Sufficient Supply of Homes - To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
11. NPPF Part 8 Promoting Healthy and Safe Communities - The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Developments should be safe and accessible; Local Planning Authorities should plan positively for the provision and use of shared space and community facilities. An integrated approach to considering the location of housing, economic uses and services should be adopted.
12. NPPF Part 9 Promoting Sustainable Transport - Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. Developments that generate significant movement should be located where the need to travel will be minimised and the use of sustainable transport modes maximised.

13. NPPF Part 11 Making Effective Use of Land - Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land.
14. NPPF Part 12 Achieving Well-Designed Places - The Government attaches great importance to the design of the built environment, with good design a key aspect of sustainable development, indivisible from good planning.

<https://www.gov.uk/guidance/national-planning-policy-framework>

LOCAL PLAN POLICY:

15. The County Durham Plan (CDP) was adopted by Full Council on the 21st October 2020. The following policies of the CDP are considered relevant to the determination of this application.
16. Policy 16 (Durham University Development, Purpose Built Student Accommodation and Houses in Multiple Occupation) seeks to provides a means to consider student accommodation and proposals for houses in multiple occupation in ensure they create inclusive places in line with the objective of creating mixed and balanced communities.
17. Policy 21 (Delivering Sustainable Transport) requires all development to deliver sustainable transport by: delivering, accommodating and facilitating investment in sustainable modes of transport; providing appropriate, well designed, permeable and direct routes for all modes of transport; ensuring that any vehicular traffic generated by new development can be safely accommodated; creating new or improvements to existing routes and assessing potential increase in risk resulting from new development in vicinity of level crossings. Development to have regard to Parking and Accessibility Supplementary Planning Document.
18. Policy 29 - Sustainable Design requires all development proposals to achieve well designed buildings and places having regard to SPD and sets out 18 elements for development to be considered acceptable, including: positive contribution to areas character, identity etc.
19. Policy 31 - Amenity and Pollution sets out that development will be permitted where it can be demonstrated that there will be no unacceptable impact, either individually or cumulatively, on health, living or working conditions or the natural environment and that can be integrated effectively with any existing business and community facilities. Development will not be permitted where inappropriate odours, noise, vibration and other sources of pollution cannot be suitably mitigated against, as well as where light pollution is not suitably minimised. Permission will not be granted for locating of sensitive land uses near to potentially polluting development. Similarly, potentially polluting development will not be permitted near sensitive uses unless the effects can be mitigated.

The above represents a summary of those policies considered most relevant in the Development Plan the full text, criteria, and justifications of each may be accessed at <http://www.cartoplus.co.uk/durham/text/00cont.htm>

STATUTORY AND INTERNAL RESPONSES:

20. DCC Highways – Raise no objection to the application. In doing so they note that under the existing C3 consent, a family could increase the number of bedrooms within the property from 2 to 4 without planning permission. This would have the same potential impact on the parking situation as this proposal which they note only needs permission as it is seeking a change of use from C3 to C4 which they note is no longer permitted development after the Council served an Article 4 Notice removing those rights in May 2017. On that basis the Highway Authority does not consider it would be possible to sustain refusal of the application on highway safety grounds.
21. In addition, they note that most of the properties on North Terrace do not appear to have any off-street parking provision and instead park on the designated (block paved) parking areas which run across the backs of their properties. While Durham County Council Parking Standards would require an additional space to be provided, the Highway Authority consider these standards to apply where there is a material alteration to the building to physically add additional space to accommodate further bedrooms. Given there is no physical increase in floor space and the works could be undertaken without control if it did not involve a material change of use, the Highway Authority does not consider the parking standards should be applied in this instance, and that any refusal of the application based on a failure to comply with those standards, or based on highway safety concerns could be sustained on appeal.
22. Framwellgate Moor Parish Council - Objects to the application calling it to committee citing concerns that a HMO at this location will have an adverse impact on the area specifically in terms of increased demand for parking which they consider is already a huge problem within the street.
23. Env. Health (Statutory Nuisance) - Have confirmed that the development complies with the TANS threshold and as such is unlikely to lead to any unacceptable adverse impact in this regard. They also note that the use would not be considered to lead to any detrimental impact upon those neighbouring commercial uses and that traffic noise is also unlikely to be an issue. Whilst they do recognise that noise could be greater from the HMO use than a single dwelling, (given greater use of the night-time economy by occupants resulting in increased noise during the evening), they note that this is anecdotal as the potential for impact is associated with the individuals residing in the property, the actual impact might differ greatly.
24. They also note that bedroom one on the ground floor maybe adjacent to commercial activities in the adjoining property, and that this could lead to a greater impact for the individual residing in this room, as well as leading to complaints against the reasonable use of the neighbouring property. As a consequence, it is recommended that should the committee be minded to grant planning permission a condition requiring the submission, agreement and installation of a scheme of sound proofing for this room prior to first occupation for the intended purpose.

Based on the information submitted with the application, they are satisfied that the development is unlikely to cause a statutory nuisance.

25. DCC HMO data - Within a 100m radius of, and including 1 Newcastle Terrace, 6.3% of properties are Class N exempt student properties as defined by Council Tax records. The application site does not currently benefit from this exemption.

26. DCC HMO Licensing team - The dwelling will be capable of forming a 4 bed non licensable house in multiple occupation. However, they have provided advice and guidance to ensure compliance with all relevant amenity and fire safety standards relating to a HMO of this type. These include that a full Fire Risk Assessment must be carried out for the property and a suitable means of escape and other appropriate fire precaution facilities and equipment be provided of a type, number and location to the satisfaction of Durham County Council's and the Fire Authority.

PUBLIC RESPONSES:

27. The application has been advertised by means of site notice, press advert and notification letter sent to neighbouring residents.
28. To date, 3no. letters of objection have been received (including representation from the City of Durham Trust and 2no. residents). These raise the following issues of concern:
- Increase in anti-social behaviour and crime
 - Increase in noise and disturbance
 - That the proposal fails to meet Nationally Described Space Standard (NDSS) in accordance with Policy 29 and therefore fails to provide a high standard of amenity and privacy.

APPLICANTS STATEMENT:

29. Not provided.

The above represents a summary of the comments received on this application. The full written text is available for inspection on the application file which can be viewed at <http://82.113.161.89/WAM/showCaseFile.do?action=show&appType=planning&appNumber=10/00955/FPA>

PLANNING CONSIDERATIONS AND ASSESSMENT

30. As identified in Section 38(6) of the Planning and Compulsory Purchase Act 2004 the key consideration in the determination of a planning application is the development plan. Applications should be determined in accordance with the development plan unless material considerations indicate otherwise. The main considerations in regard to this application are the principle of the use in this location, the impact upon the amenity of residents and highways safety.
31. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF is a material planning consideration in this regard. The NPPF advises at Paragraph 213 that the weight to be afforded to existing Local Plans depends upon the degree of consistency with the NPPF.
32. The Local Plan was adopted in 2020 and is up to date and forms Local Plan to which development should be considered. Consequently, consideration of the development should be led by the plan if the decision is to be defensible.

Principle of Development

33. The General Permitted Development Order 2015 (GPDO) permits the change of use from C3 (dwellinghouses) to uses within C4 (houses in multiple occupation HMOs). HMO's are small, shared houses occupied by between three and six unrelated individuals as their only or main residence and who share basic amenities such as a kitchen or bathroom. The proposed floor plans submitted with the application indicate that the proposal is such that the development would normally benefit from the provisions contained within the GPDO. However, an Article 4 direction came into effect on 13 May 2017 for the area withdrawing permitted development rights in this regard and as such planning permission is required.
34. Policy 16 of the County Durham Plan is relevant to this application which relates to student accommodation/HMO's and states that in order to promote, create and preserve inclusive, mixed and balanced communities and protect residential amenity, applications for new build Houses in Multiple Occupation (both Use Class C4 and sui generis), extensions that result in specified or potential additional bedspaces and changes of use from any use to a Class C4 (House in Multiple Occupation), where planning permission is required; or a House in Multiple Occupation in a sui generis use (more than six people sharing) will not be permitted if:
- a. including the proposed development, more than 10% of the total number of residential units within 100 metres of the application site are exempt from council tax charges (Class N Student Exemption);
 - b. there are existing unimplemented permissions for Houses in Multiple Occupation within 100 metres of the application site, which in combination with the existing number of Class N Student exempt units would exceed 10% of the total properties within the 100 metres area;
- or
- c. less than 10% of the total residential units within the 100 metres are exempt from council tax charges (Class N) but, the application site is in a residential area and on a street that is a primary access route between Purpose Built Student Accommodation and the town centre or a university campus.
35. The most recent up to date Council Tax information identifies that 6.3% of those properties within 100 metres of the site are currently occupied as student let accommodation and are Class N exempt.
36. Policy 16 of the CDP state that new changes of use from C3 to C4 would not be permitted in areas where more than 10% of the total number of residential units within 100 metres of the application site are exempt from council tax charges (Class N Student Exemption).
37. In the case of the application site the current concentration of properties within 100 metres of the site recorded as being Class N Council Tax exempt is 6.3% and this is below the 10% threshold stated in policy 16. In the event that planning permission is granted for the change of use of No.1 Newcastle Terrace to a C4 small HMO as proposed, then this figure would increase to 7.5% which again remains under the 10% threshold stated in policy 16 and as such the development is considered to be compliant with this Policy 16.

38. Criteria c) of Policy 16 states that development will not be permitted in instances where less than 10% of the total residential units within the 100 metres are exempt from council tax charges (Class N) but, the application site is in a residential area and on a street that is a primary access route between Purpose Built Student Accommodation (PBSA) and the town centre or a university campus. There are no PBSA facilities within close proximity to the site and as such the street is not considered to be positioned on a primary access route between any PBSA and the University and accords with the requirements of criteria c of Policy 16.
39. Given the above, it is considered that the principle of the development can be supported as the proposal, subject to the conditions stated, would accord with the requirements of Policy 16 of the County Durham Plan pending consideration of other material matters detailed below.

Impact on character and appearance of the area and residential amenity

40. Paragraph 126 of the NPPF advises that planning decisions should create places that have a high standard of amenity for existing and future users. In line with this, CDP Policy 31 states that development will be permitted where it can be demonstrated that there will be no unacceptable impact, either individually or cumulatively, on health, living or working conditions or the natural environment. Proposals will also need to demonstrate that future occupiers of the development will have acceptable living conditions. Development which will have an unacceptable impact such as through overlooking, visual intrusion, visual dominance or loss of light, noise or privacy will not be permitted unless satisfactory mitigation measures can be demonstrated. In addition, criterion e) of Policy 29 states that all development proposals will be required to provide high standards of amenity and privacy and minimise the impact of development upon the occupants of existing adjacent and nearby properties.
41. Framwellgate Moor Parish Council has raised concerns regarding the proposed bedroom sizes and shared spaces within the dwelling which they consider would fail to meet minimum Nationally Described Space Standards (NDSS).
42. NDSS is a government introduced nationally prescribed internal space standard which sets out detailed guidance on the minimum standard for all new homes and was created with the aim of improving space standards within new residential development across all tenures. Evidence compiled during formulation of the County Durham Plan identified that many new homes in the county were being built below NDSS and that this was having an impact on the quality of life of residents. As a result, Council determined that it was necessary to introduce the NDSS in County Durham with the aim of improving the quality of new build development coming forward. The plan included a 12 month transition period for the adoption of the plan in October 2020 to allow house builders sufficient time to adjust their products according to meet those standards.
43. It is noted that the current application relates to a change of use to a property already in residential use and as such would not result in any net increase in the number of residential units. In addition, it is also noted that planning permission for that change is only required as a result of the Council removing permitted development rights for changes of use from C3 to C4 small HMOs, with the aim of maintaining balanced community across the city. Consequently, the rigid application of these standards is not considered appropriate to the current application. Nevertheless, it remains that the NDSS is a relevant measurement against which to assess the suitability of internal space provided within all residential development in the context of policy 29(e) of the CDP which requires new development to provide high standards of amenity and privacy.

44. With regard to the above it is noted that all of the proposed bedrooms meet the minimum requirements of the NDSS and provide at least 7.5sq metres per room. As such these are considered to provide an acceptable amount of internal space in accordance with policy 29(e) of the CDP. With regard to the total overall internal space provided across the dwelling as a whole it is noted that the NDSS does not provide guidance specifically relating to 4 bedspace, 4 person dwellings. However, it does include standards in relation to 3 bedspace 4, 5 or 6 person dwellings and 4 bedspace 5 person dwellings and whilst the proposal would fall below those requirements by between around 9 and 20sq metres respectively, as already noted, the rigid application of NDSS is not considered appropriate in this instance for the reasons outlined in paragraphs 43 and 44.
45. Notwithstanding the above, the acceptability of the overall internal space provided is still required in the context of policy 29(e) of the CDP. In assessing the acceptability of the quality of internal space provided in that regard it is important to note that the scheme includes communal space to the ground floor in the form of a lounge/kitchen area and that this provides space within which to socialise, and that some of the bedrooms provide space in excess of the minimum standard required by NDSS.
46. In light of the above, it is considered that the development provides an adequate level of internal space in accordance with policy 29(e) of the CDP and that any refusal of the application citing a specific failure to comply with NDSS could not be sustained upon appeal.
47. Existing residents have raised concerns that the change of use would have a detrimental impact in terms of increased disruption from noise and antisocial behaviour. The Council's EHO has been consulted and confirmed that the development would fall within the thresholds associated with Council's TANS. They recognise that the change of use proposed will lead to an intensification of the residential property via the introduction of 2 No. additional bedrooms, and that the demographic who use this type of accommodation are often associated with greater use of the night-time economy. As such an increased level of night-time noise may occur. However, they also recognise that the potential for impact is associated with the individuals residing there and as such might differ greatly depending on the occupants.
48. Notwithstanding the above, the EHO considers the use is unlikely to increase the general noise in the area or impact on day-to-day amenity providing good practice and guidance is adhered to. Based on the information submitted with the application, they are therefore satisfied that the development is unlikely to cause a statutory nuisance and raise no objection to the application subject to a planning condition which requires the submission and agreed of a scheme of sound proofing. A condition requiring the submission and agreement of a management plan is also suggested although given the application relates to a small HMO this requirement is not considered necessary or reasonable and no condition has been included in this regard.
49. It is noted that the application site is an end of terraced two storey property located within a residential area predominantly characterised by small family homes. However, noting that there is no identified over proliferation of HMO properties within 100 metres of the application site, it is not considered that the introduction of a single small HMO in this location would result in a level of cumulative impact that would be unacceptably detrimental to residential amenity. Whilst it is noted that tenants would likely change on a yearly basis this is unlikely to have any adverse impact capable of sustaining refusal of the planning application. Consequently, the development is considered to accord with the requirements of policies 16 and 31 of the CDP.

50. The alteration to the front elevation, to remove the existing front window and install two new windows is not considered to detrimentally impact the character or appearance of the host property or the area, nor will they lead to a greater level of overlooking or loss of privacy given that one window will serve a non-habitable room (Bathroom), and that the property is not directly adjacent to any neighbouring dwelling. It is therefore considered that the external alterations are acceptable in accordance with Policy 29 of the CDP.
51. In light of the above the proposal is considered acceptable in terms of the impact upon the character and appearance of the area and the residential amenity of existing and future occupiers in accordance with the requirements of policies 16, 29 and 31 of the County Durham Plan and Paragraph 174 of the NPPF

Parking, Access and Highway Safety

52. Policy 16 of the CDP requires new HMO's to provide adequate parking and access and Policy 21 states that new development should ensure that any vehicular traffic generated can be safely accommodated on the local and strategic highway network. This displays broad accord with paragraph 110 of the NPPF which requires new development to provide safe and suitable access to the site.
53. The proposal is located within an area where properties do not have off-street parking and as such residents utilise existing on street parking along North Terrace. The application property is typical of terraced properties in this locality in that it has limited opportunity to increase in curtilage parking to fully accord with the Council Parking Standards. Objections have been received from neighbouring residents and the Parish Council in this regard who are concerned that the proposal would increase demand for on street parking and the number of vehicles using the local road network to the detriment of highway safety.
54. However, it is noted that the site is situated in a highly sustainable location with ready access to main bus routes offering links to the city centre and wider area. The Highway Authority offers no objection to the application recognising that the number of bedrooms could be increased without control in the event the property remained in use as a C3 dwellinghouse, and that this has been the case at other properties within the locality. In responding they note that although the Council's Parking Standards require additional in curtilage provision to serve the development, given the limited opportunity to provide this (which is an arrangement mirrored at other properties within the street), they do not consider it appropriate to rigidly apply those standards in this instance. In conclusion, they confirm that the development would not result in any unacceptable impact in terms of highway safety, and that any refusal of the application for this reason could not be sustained upon appeal.
55. Policy 16 of the CDP includes requirement for the provision of sufficient cycle parking, bin storage and other shared facilities. The Highway Authority has not raised any objection to the application in this regard and it is noted that the application site provides sufficient opportunity to accommodate appropriate cycle parking and bin storage within the curtilage of the property. Should the committee be minded to approve the application, the submission and agreement of full details in this regard prior to the first occupation of the property for the intended use, could be secured through planning condition.
56. In light of the above it is considered that the development would accordance with the aims of policy 16 and 21 of the CDP and paragraph 110 of the NPPF.

57. Part 8 of the NPPF relating to the promotion of healthy and safe communities, states within paragraph 92 that planning decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Paragraph 93 further states that in order to provide social, recreational and cultural facilities and services to meet community needs, planning decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
58. Whilst it is acknowledged that residents hold fears that crime in the area would increase as a result of the proposals, there is no evidence to underpin this. As the courts have held that the fear of crime is only a material consideration where the use, by its very nature, would provide a reasonable basis for concern, it is considered that a refusal reason framed around this issue would not be capable of being sustained. Issues of crime and the fear of crime are material considerations in determination of the application but given the nature of the proposed use it is not considered that there would be any material increase in crime as a result of the development and as such this should be afforded limited weight in the determination of this application in accordance with part 8 of the NPPF.

CONCLUSION

59. It is considered that the principle of development would accord with the requirements of Policy 16 of the County Durham Plan which is the principal policy against which the application should be assessed. In this regard it is noted that the percentage of HMOs already present in the area is below the 10% threshold contained within the policy at 6.3%, and that the change of use as proposed would not exceed this threshold.
60. When assessed against other criteria contained within policy 16 and the remaining policies of the County Durham Plan relevant to the application, it is considered that the introduction of a single small C4 HMO in this location would not unacceptably imbalance the existing community towards one dominated by HMOs, and nor would it result in any unacceptable impact upon the amenity of existing or future residents or highway safety in accordance with policies 16, 21, 29 and 31 of the County Durham Plan or parts 9, 12 and 15 of the NPPF.
61. Whilst the concerns raised by the Parish Council and objectors are noted, for the reasons discussed within this report they are not considered sufficient to sustain refusal of the application.
62. In light of the above, the application is reported to the Committee with a recommendation to approve, subject to conditions.

RECOMMENDATION

That the application be **APPROVED** subject to the following conditions;

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: Required to be imposed pursuant to Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall be carried out in strict accordance with the approved plans listed in Part 3 - Approved Plans.

Reason: To define the consent and ensure that a satisfactory form of development is obtained in accordance with Policy(ies) 16, 21, 29, and 31 of the County Durham Plan and Parts 8, 9 11 and 12 of the National Planning Policy Framework.

3. Prior to the first occupation of the development hereby approved, details of all bin stores and cycle storage shall be submitted to and approved in writing by the Local Planning Authority. The bin stores and cycle storage shall thereafter be constructed in accordance with the approved details and be made available prior to the first occupation of the property as a C4 HMO.

Reason: In the interests of visual amenity and highway safety in accordance with Policies 21 and 29 of the County Durham Plan and Parts 9, 12 and 15 of the National Planning Policy Framework.

4. Before any part of the development hereby approved is commenced a scheme of sound proofing measures shall be submitted to and approved in writing by the local planning authority. The aim of the scheme shall be to ensure that the noise insulation of walls, floors, windows, roofs between the adjoining properties shall be sufficient to prevent excessive ingress, egress of noise. The approved scheme shall be implemented prior to the beneficial occupation of the development and shall be permanently retained thereafter.

The scheme shall ensure that noise insulation should meet the requirements of BS 8233: 2014 in relation to sleeping areas within the rooms. A scheme designed to the requirements of Document E of the Building Regulations should prove sufficient.

Reason: In the interest of residential amenity in accordance with Policy 29 and 31 of the County Durham Plan and Part 12 of the National Planning Policy Framework.

STATEMENT OF PROACTIVE ENGAGEMENT

In accordance with Article 35(2) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, the Local Planning Authority has, without prejudice to a fair and objective assessment of the proposals, issues raised and representations received, sought to work with the applicant in a positive and proactive manner with the objective of delivering high quality sustainable development to improve the economic, social and environmental conditions of the area in accordance with the NPPF

BACKGROUND PAPERS

Submitted application form, plans supporting documents and subsequent information provided by the applicant.

The National Planning Policy Framework (2021)

National Planning Practice Guidance Notes

County Durham Plan (Adopted 2020)

Statutory, internal and public consultation responses



Planning Services

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Comments

Date

February 2022