



Review of the Sunderland Green Belt

Part 2: Boundary Assessment and Recommendations

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1 INTRODUCTION

Purpose of the Report

- 1.1 Peter Brett Associates LLP ('PBA') has been instructed by Sunderland City Council¹ to produce this report, which follows on from the Sunderland Green Belt Review (Reports 1-3). Our report provides a professional assessment of the city's Green Belt boundary, and recommendations for a new, robust Green Belt boundary.
- 1.2 A report produced separately by PBA² establishes that 'exceptional circumstances' exist which justify amending the currently defined Tyne and Wear Green Belt boundary to accommodate residential growth within SCC's administrative area.
- 1.3 In undertaking our assessment of Sunderland's Green Belt boundary, we have critically reviewed the outputs from the Council's three-stage Green Belt Review. We agree that the 11 'Housing Growth Areas' that are proposed in Washington, North Sunderland and the Coalfield are all in sustainable locations offering least harm to the Green Belt when considered against the purposes set out in paragraph 80 of the NPPF and a wide range of other relevant factors. We also conclude that the 11 Housing Growth Areas are required as part of the strategy to achieve the level of housing growth that has been objectively identified for Sunderland.

Structure of Our Report

- 1.4 Our Part 2 report is structured as follows:
 - Section 2 summarises the national and legal policy context pertaining to Green Belts and the criteria that must be applied when considering the designation and amendment of Green Belts.
 - Section 3 contains the findings from our review of the Council's three-stage Green Belt Review exercise.
 - Section 4 provides a methodology and our recommendations in relation to a new Green Belt boundary for Sunderland.

¹ Hereafter referred to as 'SCC' or 'the Council'. Any references to 'Sunderland' should be taken to mean the City Council's administrative area rather than the city of Sunderland and related settlements, unless otherwise stated.

² Hereafter referred to as our 'Part 1 report', with this report referred to as 'Part 2'.

2 NATIONAL POLICY CONTEXT

- 2.1 At the outset, we consider it important to recap on the national and legal policy context pertaining to Green Belts and the criteria that must be applied when considering the designation and amendment of Green Belts.

The National Planning Policy Framework

- 2.2 The National Planning Policy Framework ('NPPF', 2012) states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 6) and at the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision-taking (paragraph 14).
- 2.3 Paragraph 79 of the NPPF confirms that the Government attaches great importance to Green Belts, and that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and permanence.'*
- 2.4 Accordingly, paragraph 80 the NPPF states that Green Belt serves five purposes, namely to:
- check the unrestricted sprawl of large built-up areas;
 - prevent neighbouring towns merging into one another;
 - assist in safeguarding the countryside from encroachment;
 - preserve the setting and special character of historic towns; and
 - assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5 Policy NE6 of the Publication Draft Core Strategy and Development Plan ('CSDP') slightly updates the five purposes to reflect Sunderland's specific circumstances. The wording in draft Policy EC11 and used in the Green Belt Review is reproduced below for ease of reference:
- check the unrestricted sprawl of the built up area of the city;
 - assist in safeguarding the city's countryside from further encroachment;
 - assist in the regeneration of the urban area of the city;
 - preserve the setting and special character of Springwell Village and Newbottle Village; and
 - prevent the merging of Sunderland with Tyneside, Washington, Houghton-le-Spring and Seaham, and the merging of Shiney Row with Washington, Chester-Le-Street and Bournmoor.
- 2.6 Paragraph 83 of the NPPF then goes on to explain that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy'*, and that *'once established Green Belt boundaries should only be altered in exceptional*

circumstances, through the preparation or review of the Local Plan'. The NPPF compels local authorities to 'consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'.

2.7 Paragraph 84 of the NPPF then states that:

'When drawing up or reviewing Green Belt Boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt Boundary, towards towns and villages inset within the Green Belt Boundary or towards locations beyond the outer Green Belt boundary'.

2.8 When defining Green Belt boundaries, paragraph of 85 the NPPF recommends that local planning authorities should apply the following criteria:

- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- not include land which it is unnecessary to keep permanently open;
- where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- make clear that the safeguarded land is not allocated for development at the present time; planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

2.9 We note, however, that there is no definitive adopted national guidance on how Green Belt Reviews should be carried out.

Draft Revised National Planning Policy Framework

2.10 In March 2018, the Government published its draft revised NPPF for consultation. The revised NPPF is subject to change and is not in its final form, and therefore carries limited weight at present. The revised wording nevertheless indicates the general direction of travel for Government policy, and introduces some new requirements pertaining to the amendment of Green Belt boundaries. Therefore, for completeness, we consider it important to highlight the key messages and changes in the draft revised NPPF insofar as they relate to Green Belt matters.

2.11 Green Belt is covered in Chapter 13 of the draft revised NPPF, and although some of the text remains unaltered from the current (2012) version of the NPPF there are some notable differences.

- 2.12 The text currently at paragraph 83 of the NPPF is proposed to be replaced with the following text at paragraph 135 of the draft revised NPPF:

‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or updating of plans. Strategic plans should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been demonstrated through a strategic plan, detailed amendments to those boundaries may be made through local policies, including neighbourhood plans.’

- 2.13 Crucially, paragraph 136 of the draft revised NPPF introduces an entirely new set of requirements relating to the demonstration of exceptional circumstances necessary to justify changes to Green Belt boundaries, as follows:

‘Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.’

- 2.14 Furthermore, current paragraph 84 of the NPPF is proposed to be amended by new paragraph 137 which includes the following additional text:

‘Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.’

Planning Practice Guidance

- 2.15 The Planning Practice Guidance (‘PPG’) states that local planning authorities should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF or specific policies indicate that development should be restricted. Such policies include land designated as Green Belt.
- 2.16 The PPG also states that once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic

assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any constraints such as Green Belt, which indicate that development should be restricted and which may restrain the ability of an authority to meet its need.

- 2.17 The PPG makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

3 SUNDERLAND GREEN BELT REVIEW

Introduction

- 3.1 The Council considers that exceptional circumstances exist which justify the release of land from the Green Belt to accommodate identified growth needs across the city. In our Part 1 report we review the strategic context and existing evidence base and reach the firm conclusion that we concur with the Council that exceptional circumstances do exist.
- 3.2 Against the background referred to above, the Council has already undertaken a three-stage review of the Green Belt across Sunderland, as follows:
- Stage 1 (Growth Options) – during this stage, Sunderland’s Green Belt was divided into 13 sub-areas, which were then broken down further into smaller ‘fields’. The ‘fields’ were then assessed against the five Green Belt purposes set out in the NPPF. Some land parcels which performed a strong Green Belt function were then excluded from further consideration, while others were recommended to be carried forward for the next stage of assessment.
 - Stage 2 (Update of Stage 1, ‘Call for Sites’ review and Constraints Assessment) – this stage of work involved a review of Stage 1 to consider consultation responses, an assessment of specific sites put forward by landowners and developers through a ‘call for sites’ exercise, and a ‘Category 1’ constraints review (that is, whether the site is constrained by SSSI, RAMSAR, Flood Zone 3, SAC, SPA and other policy designations of national importance).
 - Stage 3 (Site Selection) – this report considered the overall deliverability of the sites taken forward from Stages 1 and 2. Each site was assessed against a range of suitability, availability and achievability criteria, and a conclusion was reached as to which sites were deemed to be the most appropriate for release from the Green Belt.
- 3.3 In this section of our report, we provide the findings from our review of the documents which comprise the outputs from the Council’s three-stage Green Belt Review. At the outset, we note that the documents are comprehensive and so we do not attempt to provide a detailed review of them here. Instead, we provide our key observations regarding SCC’s general approach to the Green Belt Review³, as well as the Council’s findings.

³ The Stage 1 referred to ‘Green Belt Review’ whereas the Stage 1 Update and Stage 2 Report used the term ‘Green Belt Assessment’.

Green Belt Review – Stage 1

- 3.4 SCC published a Stage 1 report in May 2016. The report was comprehensive – running to 116 pages – but we do not provide a detailed review of it here because it was effectively superseded by a follow-up document entitled ‘Green Belt Assessment – Stage 1 Updated and Stage 2’, which was published in 2017.

Green Belt Assessment – Stage 1 Updated and Stage 2

- 3.5 This stage of work involved a review of Stage 1 to consider consultation responses, an assessment of specific sites put forward by landowners and developers through a ‘call for sites’ exercise, and a review of ‘Category 1’ constraints (that is, whether the sites are affected by SSSI, RAMSAR, Flood Zone 3, SAC, SPA, and other designations of national importance). For brevity, we use the shorthand ‘Stage 2 report’ below.

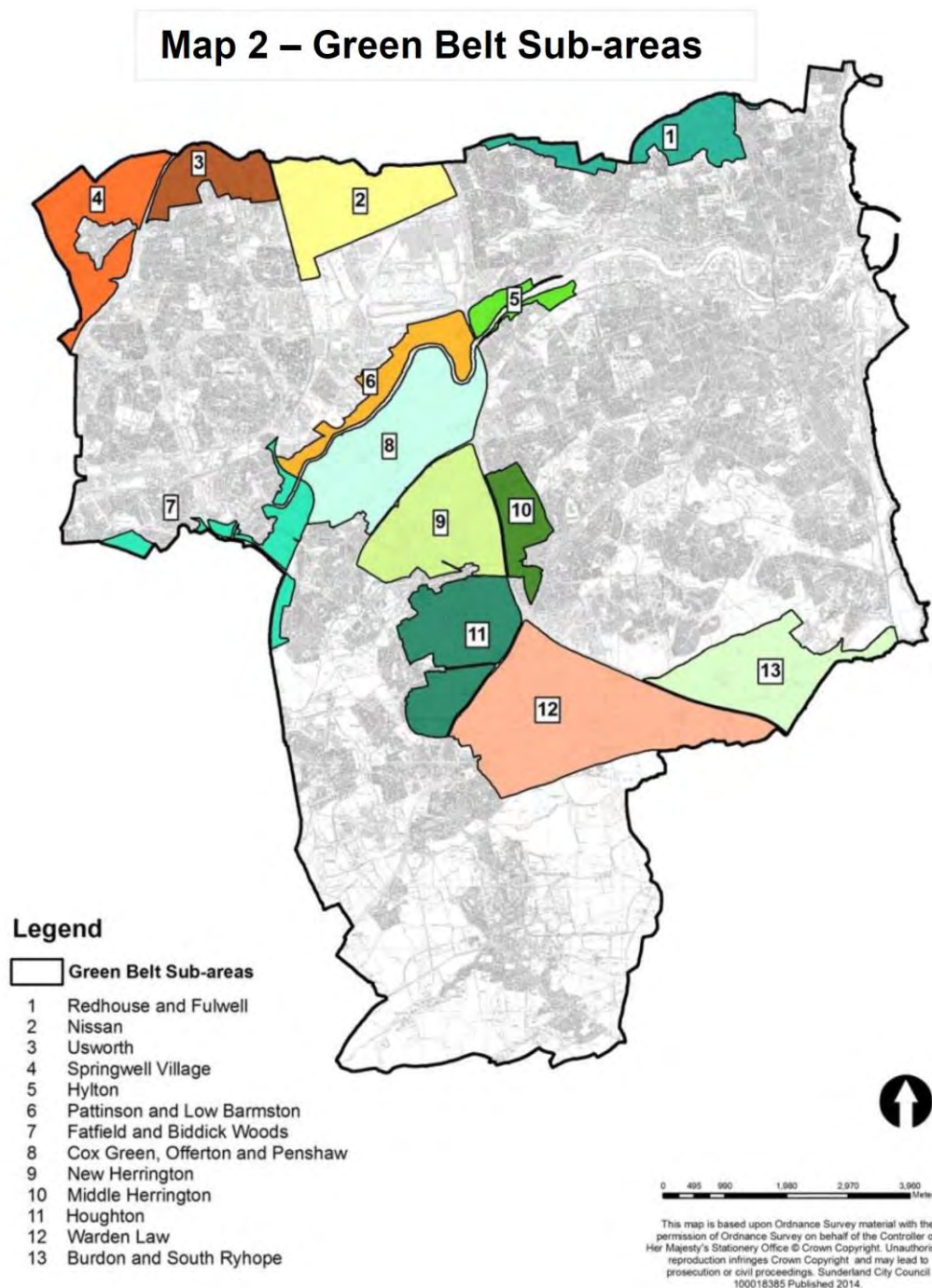
Definition of Sub-areas

- 3.6 SCC divided the Green Belt across Sunderland’s administrative area into 13 ‘sub-areas’, which were defined based on permanent and defensible boundaries including strategic A and B roads, existing and former railway lines, the River Wear, the urban area boundary, and the Sunderland City Council boundary. The 13 sub-areas are depicted graphically on page 16 of the Stage 2 report, which is reproduced below as Figure 3.1 for ease of reference.
- 3.7 It is clear from the Stage 2 report that the Council has recognised the particular roles that each of the 13 sub-areas performs in the context of Sunderland’s Green Belt, rather than assuming that they all perform the same role. For instance, the report recognises that:
- certain sub-areas have an important role to play in terms of separating Sunderland from South Tyneside;
 - various sub-areas prevent specific settlements from merging (such as Washington and Penshaw/Houghton/Sunderland); and that
 - other sub-areas have distinct roles to play in relation to strengthening the role of national and local wildlife sites, preserving the opening of river valley landscapes, and so on.
- 3.8 We have undertaken our own assessment of the role performed by the various sub-areas. We consider that large swathes of Sunderland’s Green Belt should effectively be considered sacrosanct because of their strategic significance. For instance:
- Much of the Green Belt land within the northern and north-western parts of SCC’s administrative area supports an area of separation between Sunderland and South Tyneside, and between Washington and Gateshead.
 - The central band of Green Belt to the south of the River Wear – corresponding to sub-areas 8, 9, 10, 11 and 12 – prevents Houghton-le-Spring and other

settlements in the western part of the city from merging with Sunderland. This swathe of Green Belt also supports strategic green corridors within the central part of the city.

- 3.9 In general terms, we consider that the specific roles performed by the various parts of Sunderland's Green Belt have been appropriately taken account of in the conclusions reached for each of the sub-areas. Thus, where a sub-area (or part of a sub-area) is identified as performing a fundamentally important Green Belt role, then it was not considered further in the review process.
- 3.10 The one departure from the approach described above relates to sub-area 2 (Nissan Area), but there are important reasons for that apparent departure. Whilst the Stage 2 report recognises the important contribution that the sub-area makes in terms of physically separating Washington from Sunderland – and the city generally from South Tyneside – it also acknowledges that there has been considerable industrial and housing development within the employment areas of Nissan and Pattison, and that these areas continue to grow.
- 3.11 The report also acknowledges that the strategic purpose of separating Washington from Sunderland has already been weakened by the existing employment land associated with the Nissan Motor Manufacturing complex, which is located between the two urban areas. Furthermore, the role of the sub-area in terms of supporting a north-south green infrastructure corridor to the River Wear has also been weakened by recent development between Nissan and Pattinson.
- 3.12 Moreover, the sub-area is located within a wider area that is subject to a Nationally Significant Infrastructure Project, which will deliver an International Advanced Manufacturing Park ('IAMP') adjacent to Nissan on land that is within the Tyne and Wear Green Belt, to be progressed as a Development Consent Order. A separate report produced jointly by SCC and South Tyneside Council and dated February 2017 concluded that there is a clear exceptional circumstances case for the proposed IAMP. The site was duly allocated in the IAMP AAP, which was adopted in November 2017.

Figure 3.1 Green Belt Sub-areas



Definition of Parcels

- 3.13 The 13 sub-areas were broken down into separate 'parcels', based mainly on durable features such as strategic roads, railway lines, water bodies and established boundaries, but within softer/less durable boundaries used in other cases (using professional judgement) in order to define manageable parcels. The features used to define the parcels are specified in Table 2 of the Stage 2 report, which we reproduce below for ease of reference.

Figure 3.2 Definition of Parcel Boundaries in the Sunderland Green Belt Assessment

Type of feature	Feature
Durable features (readily recognisable and likely to be permanent)	<p>Infrastructure:</p> <ul style="list-style-type: none"> • Motorway • Roads ('A' Roads, 'B' Roads and unclassified 'made' roads) • Railway line (in use or mothballed) • Existing boundaries with clear established, contiguous boundaries <p>Natural:</p> <ul style="list-style-type: none"> • Water bodies and water courses (lakes, rivers, streams) • Protected woodland (TPO) or hedges or ancient woodland that is contiguous <p>Prominent landform (e.g. ridgeline)</p> <p>Combination of a number of boundaries below</p>
Features lacking durability (Soft boundaries which are recognisable but have lesser permanence)	<p>Infrastructure:</p> <ul style="list-style-type: none"> • Private/unmade roads or tracks • Existing development with irregular boundaries • Disused railway alignments • Footpath accompanied by other physical features (e.g. wall, fence, hedge) <p>Natural:</p> <ul style="list-style-type: none"> • Watercourses (brook, drainage ditch, culverted watercourse) accompanied by other physical features • Field boundary accompanied by other natural features (e.g. tree line, hedge line)

- 3.14 In our assessment, the approach taken to define the extent of the various land parcels is robust and consistent with the advice provided within paragraph 85 of the NPPF. We confirm that Green Belt Reviews commonly follow the approach outlined above. A general observation is that the field parcels do not necessarily correspond with developable plots, and so the latter can therefore sometimes be discounted because they are within field parcels that include significant constraints which could otherwise be avoided. The Council's approach during Stage 2 of the Green Belt Review was pragmatic and reviewed submitted sites again, with sites often using part of a parcel only or alternatively using a combination of parcels that avoided the most sensitive and constrained areas. This approach is fully endorsed.
- 3.15 Accordingly, what we perceive to be a common methodological flaw with Green Belt reviews, described above, has not manifested itself in Sunderland's case. SCC recognised that there may be exceptions within 'eliminated' parcels that could be considered further, especially where they adjoin an existing urban area.

SCC's Assessment of Green Belt 'Parcels'

- 3.16 Each parcel was assessed against the five purposes of Green Belt, which are consistent with the purposes set in the NPPF, but adjusted to reflect local circumstances and the unique character of Sunderland. The assessment undertaken during Stage 1 was updated in Stage 2, taking into account representations made during the Growth Options consultation.

- 3.17 For purposes 1-4, each parcel was assessed using a green-amber-red system, with green representing a zero or minor impact in relation to the Green Belt purpose, amber signifying a moderate impact and red denoting a major adverse impact.
- 3.18 For purpose 5 (*'assist in urban regeneration, by encouraging the recycling of derelict and other urban land'*), parcels were assessed in a different way, reflecting the specific wording of purpose 5 in the Sunderland context. A green rating was assigned to brownfield and greenfield land within the built-up area, or brownfield land in urban fringe locations, whereas brownfield land within the open countryside and greenfield land in urban fringe or open countryside locations was given an amber rating.
- 3.19 The detailed scoring system is described on pages 19-23 of the Stage 2 report. For brevity, we do not repeat that detail in full here, suffice to record that we consider the Council's approach to be thorough, taking account of a wide range of relevant factors including the following:
- the extent of shared boundaries with the existing urban form;
 - whether the parcel could be considered to represent infill or rounding-off of the urban area or settlement;
 - the likelihood of further sprawl beyond any potential new Green Belt boundary, taking account of existing physical features and the characteristics of the surrounding area;
 - the distance between neighbouring settlements;
 - whether the release of the parcel would materially affect the character of separate settlements; and
 - the role of the parcel in terms of supporting overall countryside openness.
- 3.20 Parcels were also assessed in relation to various 'Category 1' constraints, namely designations of national importance. Any land affected by these absolute constraints was deemed not be suitable for development and ruled out from assessment. The area of land not affected by the Category 1 constraints was then re-tested against the five Green Belt purposes, including an analysis of the defensibility of the site's boundaries.
- 3.21 Some land parcels which performed a strong Green Belt function were then excluded from further consideration, while others were recommended to be carried forward into the next stage of assessment. If a site was not deemed to have a major impact on Green Belt purposes and is not affected by category 1 constraints, it was then able to be considered as part of the Site Selection process.
- 3.22 We endorse the approach described above, which accords with the approach that we routinely take when undertaking this type of assessment exercise.
- 3.23 The findings in relation to each land parcel are contained within Appendices 1 and 2 to the Stage 2 report. Section 7 of the report contains a schedule of those sites which were consequently recommended to be taken forward for more detailed assessment in subsequent stages. Having undertaken our own review of the Stage 2 work on a site-by-site basis – informed by site visits – we consider that the assessment of the

various land parcels described above is comprehensive, and adequately takes account of the particular roles performed by each section of Sunderland's Green Belt.

- 3.24 We note in passing that the conclusion reached for Green Belt Parcel reference BU2 on page 117 of the Stage 2 report is that it should be 'discounted' – that is, not taken forward for further consideration – but the subsequent text in the Stage 2 report then also stated that the site should be *'considered as part of site selection process'*. We note that this error is corrected in the 2018 Addendum to the Stage 3 Green Belt Site Selection Report.
- 3.25 We also support the following elements of the Council's approach to the Green Belt Review:
- SCC's use of a ranking system rather than a scoring system. In our experience, the latter is too blunt an instrument because greenfield Green Belt parcels/sites often attain a similar score when measured against the five Green Belt purposes. For instance, most such areas of land will encroach into the countryside at least to some degree; most will not affect the special character of historic towns and settlements; and most will not assist in urban regeneration. Accordingly, a scoring system often results in a narrow band of scores, which is of little utility.
 - The Council has properly acknowledged the importance placed upon Green Belts by the NPPF. The reports emphasise the clear direction in paragraph 83 of the NPPF, namely that Green Belt boundaries are intended to be permanent in the long term and should only be altered in exceptional circumstances. The same section also acknowledges that unless there is clear evidence of an under-provision in the supply of housing or employment land – or other unique circumstances exist – the Green Belt boundaries in the city should remain unchanged.
 - We are also satisfied that the Council has examined the whole of the Green Belt, to determine if it is fully fit for purpose and aligned to the five purposes of the Green Belt. We confirm that the Council's approach is comprehensive in terms of its geographical coverage. That is an important point because some other Green Belt reviews that we have seen are partial in their coverage, which can leave them open to criticism at the plan examination stage.

Green Belt Assessment – Stage 3 Site Selection Report

- 3.26 The Stage 3 report considered the overall deliverability of the sites taken forward from Stages 1 and 2. Each site was assessed against a range of suitability, availability and achievability criteria, and a conclusion was reached as to which sites were deemed to be the most appropriate for release from the Green Belt.
- 3.27 Section 3 of the Stage 3 report provides details of how candidate sites were assessed. A wide range of evidence base studies were used to inform the assessments and the specific assessment criteria encompassed a wide range of

factors, again using a green-red-amber system, with green indicating zero or minor impact, amber a moderate impact and red a high level of impact.

- 3.28 As with the assessments during earlier stages of the process, we consider the Council's approach to Stage 3 to be comprehensive and robust. We also endorse the Council's approach in relation to achievability/viability and estimating the development potential of sites – including factors such as density, gross to net ratios and build rates – which is commonly an area of weakness with studies of this nature.

4 GREEN BELT BOUNDARY ASSESSMENT AND RECOMMENDATIONS

Methodology

- 4.1 In this section, we provide the findings from our comprehensive review of the entire Sunderland Green Belt along with our recommendations regarding the most appropriate Green Belt boundary for Sunderland.
- 4.2 For each of the 13 sub-areas that were defined during the Green Belt Review process – as depicted on page 16 of the Stage 2 report, reproduced above as Figure 3.1 – we summarise the role performed by the sub-area and we identify the broad boundary areas that should be retained, highlighting the nature of the boundary and why it is strong and durable.
- 4.3 We then cover each of the elements described below in turn, before providing a summary of our assessment and the resultant new Green Belt boundary for Sunderland, which we believe is logical and robust.

SCC's proposed Housing Growth Areas⁴

- 4.4 We have reviewed the Council's assessments in relation to the 11 proposed Housing Growth Areas and we agree that each of them represents a logical opportunity for helping to ensure that Sunderland is able to meet its housing growth requirements. Moreover, we agree that the 11 Housing Growth Areas are required as part of the Council's strategy to achieve the level of housing growth that has been objectively identified for Sunderland, and that the Council's proposed strategy represents the most sustainable approach to meeting its housing requirement, whilst offering the least harm to Sunderland's Green Belt.
- 4.5 In order to reach an informed view, as well as reviewing the Council's evidence base documents, we visited each of the sites in person to record details of site characteristics using a standard pro-forma. Our pro-forma and photographs of each site are contained within the Appendices to this report.
- 4.6 Our findings and recommendations in relation to the Green Belt boundary amendments necessitated by the release of each of the proposed Housing Growth Areas are then set out. We agree with the Council's proposed boundary in most instances, but in a number of cases we recommend adjustments to the specific boundaries. We also comment on the need for bolstered and/or new permanent, defensible Green Belt boundaries wherever appropriate.
- 4.7 Some of the proposed Housing Growth Areas do not currently have established, permanent, defensible boundaries, being defined by relatively sparse existing hedgerows and/or treelines and, in some cases, there is no readily identifiable on-ground boundary present. In those instances, there will be a need to create a more

⁴ Previously referred to as 'Housing Release Sites' in the Green Belt Assessment and other documents.

robust, durable boundary either by means of substantially bolstering the existing hedgerow/treeline, or by creating a new boundary.

- 4.8 It is unrealistic to expect sites to be demarcated by new motorways/strategic roads, railway lines and water bodies and so, in most cases, we suspect that the bolstered or new boundary will be created through dense additional planting of hedgerows/treelines. The most appropriate approach to the boundary treatment can be determined through a design exercise (presumably best undertaken by a landscape architect).

The Council's proposed Safeguarded Land

- 4.9 We provide our detailed observations and advice regarding the large area of Safeguarded Land that is proposed, adjacent to the IAMP in the northern part of the city. We acknowledge that the Council also proposes to safeguard land adjacent to Springwell, but that section of land is much smaller and so we do not comment on it in our report, instead focusing on other proposed changes around Springwell.

Other changes to the Green Belt boundary

- 4.10 There are some instances where the existing Green Belt boundary includes areas of land (usually small-scale) which appear to serve no meaningful Green Belt purpose. In other cases, the Green Belt excludes parcels of land for no obvious reason and their inclusion would create a more sensible boundary line or 'rounding off' of the Green Belt.
- 4.11 Accordingly, within our commentary for each of the 13 Green Belt sub-areas, we provide our recommendations for other changes to the Green Belt boundary (that is, over and above the proposed Housing Growth Areas and Safeguarded Land), which comprises a combination of additions and deletions.

Green Belt Sub-Area 1 – Redhouse and Fulwell

Role Performed by the Sub-Area

- 4.12 Sub-area 1 is located within the northern part of the city and has an important role to play in separating Sunderland from South Tyneside. Consequently, it would be illogical to remove Green Belt land adjacent to the administrative boundary between Sunderland and South Tyneside and so the entire northern boundary of sub-area 1 should not be altered.
- 4.13 Below, we provide our assessment of the most appropriate future boundary for sub-area 1, focusing on the southern and eastern part of the boundary given our comments above.

Our Assessment of HGA8 (SHLAA site ref. 675) – Fulwell

- 4.14 HGA8 is located to the immediate north and west of the built-up part of Fulwell, with the open Green Belt to the north. We agree that residential uses at the site would relate well to existing housing in Fulwell.

- 4.15 The site is bounded by a dense treeline to the west and south and by trees alongside the A1018 Newcastle Road to the east. The southern boundary is currently in the form of a high spiked metal fence and a treeline/other planting, which thins out near the A1018. The main requirement would be to create a new, defensible Green Belt boundary along the northern part of the site, presumably by means of a new treeline and/or dense vegetation.
- 4.16 Given the presence of a golf driving range and a pub/restaurant to the north of HGA8 as currently defined, we have considered whether further land could be removed from the Green Belt to the north of HGA8, perhaps up to the up to the A184. On the one hand that could make some sense, given the extent of built development to the east of the A1018. Our conclusion, however, is that the boundary should remain as currently shown on the Council's plans.
- 4.17 In forming the conclusion outlined above, we have taken account of the wider context to the west of the A1018, as well as the important contribution that this part of the Green Belt makes in terms of maintaining a strategic gap between Sunderland and South Tyneside. In our assessment, releasing further land to the north of HGA8 as currently defined would weaken the role of this part of the Sunderland Green Belt.

Other Changes to the Boundary of Sub-Area 1

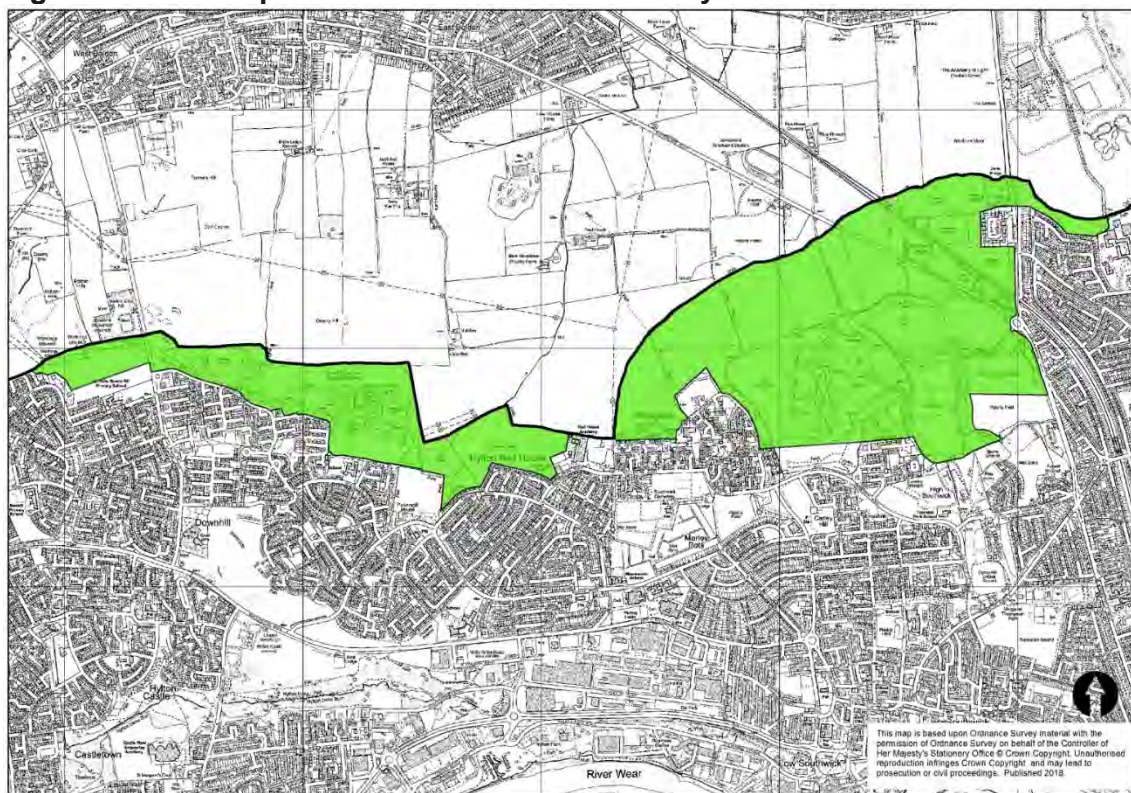
- 4.18 The following table identifies our other recommended changes to the boundary of sub-area 1.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
23	Land north of Emsworth Road	Addition to Green Belt	Extension of the Green Belt boundary to the east to include part of Fulwell Quarries parkland that extends up to the existing right of way / fence line. Green Belt extended north of Eyemouth Lane to follow the existing built development and to stop cutting through the middle of a protected Local Nature Reserve. A logical straightening of the Green Belt to the west is supported (requiring a new robust and defensible boundary), which would be bounded to the south by a future housing development.	57
24	Land north-west of Rhodesia Road	Addition to Green Belt	The current boundary cuts through area of green space - it would be more logical to bring all this land within the Green Belt to create a more defensible and recognisable boundary following the rear of the existing properties off Rhodesia Road.	58
32	The Square	Deletion from Green Belt	Land has been developed for housing and should be removed from the Green Belt.	60

Summary

- 4.19 The amendments described above will ensure that a logical and robust Green Belt boundary is in place on the northern side of Sunderland, which is capable of enduring so that a strategic gap is maintained between Sunderland and South Tyneside. A plan showing the overall new proposed Green Belt boundary for Sunderland is provided within the Appendices to this report, and an extract illustrating the new boundary in this part of the city is provided below for ease of reference.

Figure 4.1 Our Proposed New Green Belt Boundary for Sub-Area 1



Green Belt Sub-Area 2 – Nissan

Role Performed by the Sub-Area

- 4.20 The Nissan sub-area makes an important contribution in terms of physically separating Washington from Sunderland, and the city generally from South Tyneside. Notwithstanding that important role, there has been considerable industrial and housing development within the employment areas of Nissan and Pattison, which continue to grow, and the strategic purpose of separating Washington from Sunderland has already been weakened by the existing employment land associated with the Nissan Motor Manufacturing complex, which is located between the two urban areas. Furthermore, the role of the sub-area in terms of supporting a north-south green infrastructure corridor to the River Wear has also been diminished by recent development between Nissan and Pattinson.
- 4.21 Furthermore, as we explained in Section 2, the eastern section of the sub-area forms part of the IAMP, adjacent to Nissan. The IAMP is already allocated in the IAMP Area Action Plan ('AAP'), which was adopted in November 2017.
- 4.22 We turn now to consider the remaining part of the sub-area, namely the land to the west of the allocated IAMP, east of Washington. As with sub-area 1, there is no justification for amending the Green Belt boundary along the administrative boundary between Sunderland and South Tyneside. The remaining section of land does not contain any proposed Housing Growth Areas but it is identified in the Publication

Draft CSDP as Safeguarded Land. We provide our assessment of the Safeguarded Land, below.

Our Recommended Boundary – Safeguarded Land

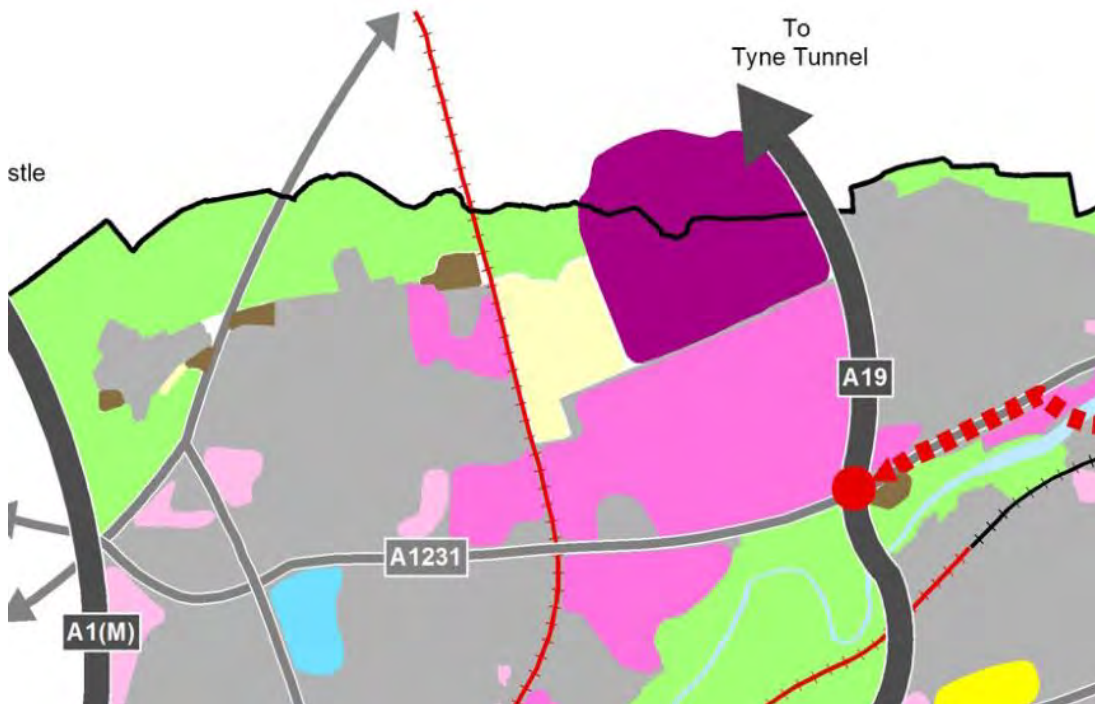
- 4.23 The NPPF indicates that Green Belt should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. When revising Green Belt boundaries, the NPPF also indicates that local planning authorities should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The third bullet point under paragraph 85 of the NPPF explains that, where necessary, the local planning authority should identify 'safeguarded land' between the urban area and the Green Belt, in order to meet likely longer term strategic development needs beyond the plan period.
- 4.24 To this end, proposed Policy SS3 ('Safeguarded Land') of the Publication Draft CSDP identifies approximately 100 hectares of land to the east of Washington and to the west of the International Advanced Manufacturing Park ('IAMP') site as a Safeguarded Land, to meet future development needs beyond 2033. The draft CSDP explains that the land is not allocated for development within the CSDP and that the site will not be developed within the plan period unless a review is undertaken. The land will, however, be removed from the Green Belt and held in reserve to meet future development needs, to assist in maintaining the permanence of the new Green Belt boundary and to reduce pressure to undertake a further Green Belt boundary review in the near future.
- 4.25 As part of our current instruction, we have reviewed the need to identify Safeguarded Land to accommodate development beyond the plan period, and we have considered whether the location and extent of land identified in the draft CSDP is appropriate. In the interests of completeness, we have also considered whether there is a compelling case to release this land for development during the plan period.

The need to identify safeguarded land in Sunderland

- 4.26 We have examined the strategic context and existing evidence base insofar as it relates to the possible need to release land from the Green Belt around Sunderland, which has involved a comprehensive review of relevant national and local policy and evidence base documents. Having carefully considered the current and emerging national guidance relating to Green Belt boundary reviews, we have reached the conclusion that, in our professional judgement, exceptional circumstances do exist that justify the removal of some land from the currently defined Green Belt within the northern part of SCC's administrative area.
- 4.27 In reaching the conclusion outlined above, we have taken account of the imbalance in the spatial distribution of the identified supply of available development land in Sunderland. The vast majority of the identified supply is located within the southern part of SCC's administrative area, which is not currently constrained by Green Belt. Furthermore, we have highlighted that the focus of economic growth and employment generation over the plan period will be at the IAMP to the north of the existing Nissan plant in Washington.

- 4.28 The effect of removing the IAMP site from the Green Belt is that there is an area of land to the immediate west of that site which will arguably perform a more limited Green Belt function than was the case prior to the allocation of the IAMP in the adopted IAMP Area AAP), as shown in the excerpt from the Publication Draft CSDP below (the proposed Safeguarded Land is shown in beige):

Figure 4.2 Extract from the Publication Draft **CSDP** 'Key Diagram'



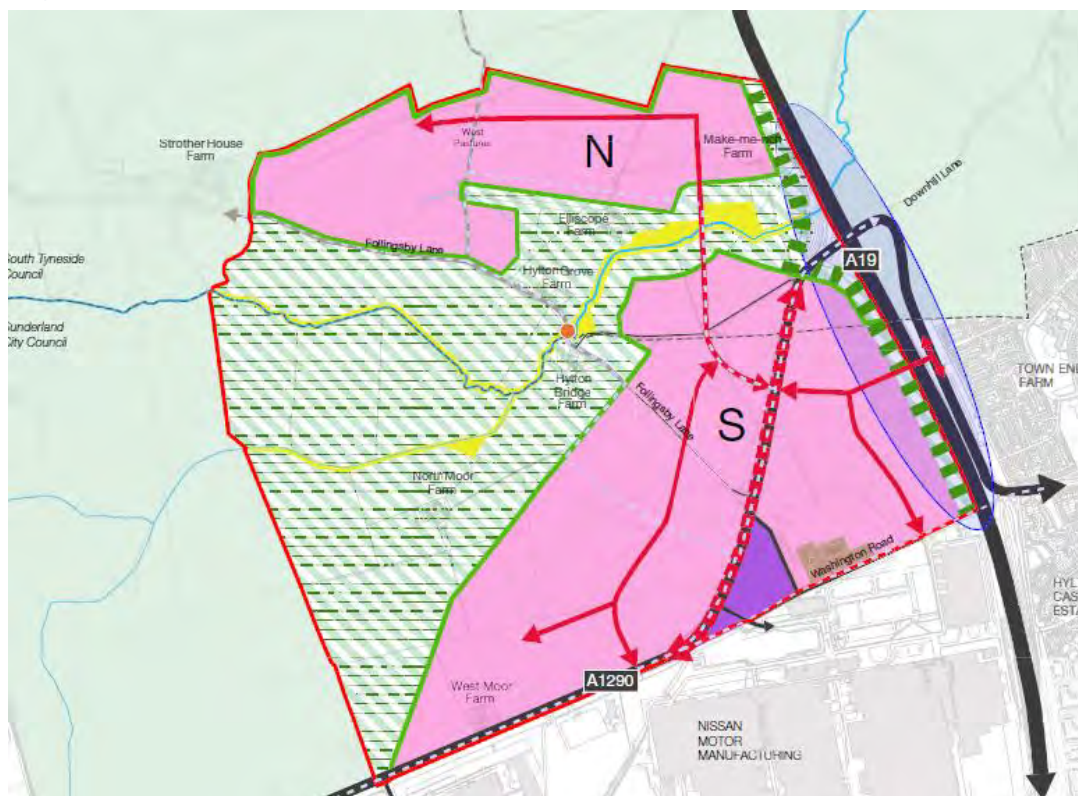
- 4.29 The proposed Safeguarded Land is well contained between existing built development to the west and south, and the boundary of the IAMP site to the east (shown in purple on the plan extract above). The removal of part or all of this land from the currently defined Green Belt therefore appears to be a logical step in the context of the wider strategic release of Green Belt in this location. This area of land is well-placed to meet potential future development needs in the northern part of the city, and will assist in ensuring the permanence of the new Green Belt boundary in accordance with the NPPF.
- 4.30 While this general area of land will become isolated from the broader Green Belt and there is strong justification for the removal of some or all of the land to accommodate future development needs, we are not convinced that there is compelling evidence to suggest that the land should be released and allocated for development within the plan period. The Council has undertaken a robust and comprehensive Green Belt Assessment, which has resulted in the identification of 11 proposed Housing Growth Areas. Those 11 sites, together with the IAMP, are capable of accommodating the projected housing and employment needs of the city over the plan period. The Council has sought to identify a range of sites in sustainable locations in the north and south of SCC's administrative area, and we consider that the overall proposed spatial strategy is sound.

- 4.31 The development sites identified in the Publication Draft CSDP have been assessed in detail and are considered to be deliverable. In contrast, the area of land currently identified for safeguarding will require significant new infrastructure to facilitate development, and therefore while it is likely to be developable in the longer term, it is not considered to be as deliverable in the short to medium term as the currently proposed Housing Growth Areas.
- 4.32 From the evidence available at present, we consider that it is unnecessary for the proposed Safeguarded Land to be allocated for development at an earlier point in time, unless there are significant changes to the evidence base underpinning the plan strategy and a review is required before the end date of the new CSDP. We would also have some reservations regarding the timescales involved in bringing the land forward for development, and therefore immediate release of this site may jeopardise progress in terms of meeting the development needs of the city in the more immediate term.

Safeguarded Land boundary

- 4.33 Looking in more detail at the allocated IAMP site in the adopted AAP, it is clear that the built-up areas will be confined to two parcels, namely the Northern Employment Area (area 'N' in the plan excerpt below) and the Southern Employment Area (area 'S' in the plan excerpt below). The area of land in-between these two parcels and to the west of the IAMP site is identified as an 'Ecological and Landscape Mitigation Area', incorporating Local Wildlife Sites around the River Don.

Figure 4.3 Extract from the IAMP AAP Policies Map



- 4.34 For the reasons outlined above, the western boundary of the IAMP site will not comprise the edge of built development, but will continue to function as open undeveloped land. Against that contextual background, the case for the release and development of the entire area of land currently identified for safeguarding is arguably less clear cut. The currently proposed area of Safeguarded Land will therefore still read as a broad swathe of undeveloped land to the north of Sunderland, stretching across and over the IAMP Southern Employment Area. The release and development of the currently defined Safeguarded Land, either now or in the future, could potentially create a somewhat isolated parcel of land between the eastern boundary of the site and the Northern and Southern IAMP Employment Areas. Accordingly, in our assessment, there is a case to maintain an open interface between the western boundary of the IAMP AAP area, and the remainder of the Tyne and Wear Green Belt.
- 4.35 The proposed Safeguarded Land was also assessed in detail as part of the Green Belt Assessment undertaken by the Council, the assessment parcels in question being NI5, NI6, NI10, NI11, NI12 and NI13. The early recommendation in the Green Belt Assessment was that parcels NI5 and NI6 should not be assessed further. That view was subsequently revised, however, with the Stage 2 report explaining that those two parcels should be considered further as part of a larger land area.
- 4.36 Accordingly, land parcels NI5, NI6, NI10, NI11, NI12 and NI13 were considered in the Stage 3 Green Belt Site Selection Report. The Stage 3 report recognised that the north-western part of that overall area is affected by flood risk and that the western half of the combined area is part of a strategic green corridor. Nevertheless, the report concluded that if the scale of development can enable provision of on-site facilities to enable the site to become suitable and sustainable in access terms – and the significant constraints relating to the impact to the local highway network and to area biodiversity, hydrology and green infrastructure can be overcome – then the site is potentially achievable. The Stage 3 report concluded that the combined area – that is, parcels NI5, NI6, NI10, NI11, NI12 and NI13 taken together – should be safeguarded and removed from the Green Belt.
- 4.37 Whilst we consider that there is a case to exclude parcels NI5 and NI6 from the area of proposed Safeguarded Land, and confine the area of release to the land comprising parcels NI10, NI11, NI12 and NI13, we accept that the wider area of land (that is, incorporating parcels NI5 and NI6) provides the opportunity to address the various constraints through a comprehensive approach to development.
- 4.38 We also consider that the existing hedgerow/treeline along the northern edge of the proposed Safeguarded Land arguably provides a stronger boundary than the field boundaries to the north of parcels NI10, NI12 and NI13.
- 4.39 On balance, we support the proposed boundary for the Safeguarded Land as defined by the Council.

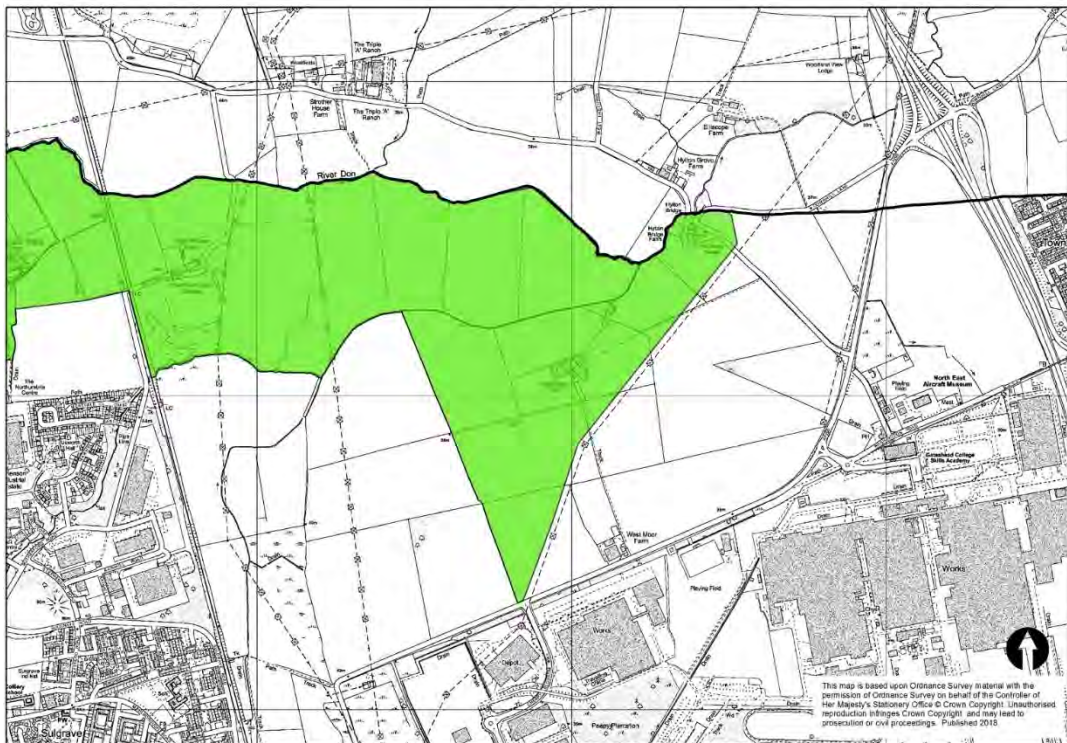
Other Changes to the Boundary of Sub-Area 2

- 4.40 We do not have any other recommended changes to the boundary of sub-area 2.

Summary

- 4.41 The plan below shows the new Green Belt boundary following the proposed amendments described above. Whilst the various changes associated with the IAMP (already effected through the IAMP APP) and the proposed Safeguarded Land have the effect of significantly changing the Green Belt boundary of sub-area 2, the new Green Belt boundary will help to ensure that a strategic gap remains between Sunderland and South Tyneside.

Figure 4.4 Our Proposed New Green Belt Boundary for Sub-Area 2



Green Belt Sub-Area 3 – Usworth

Role Performed by the Sub-Area

- 4.42 The portion of Green Belt to the north of Usworth/Washington performs an important role in physically separating Washington from Gateshead. Accordingly, much of the land within this area is fundamental to the purposes of the Sunderland Green Belt and there is no justification for removing Green Belt land adjacent to the administrative boundary between Sunderland and Gateshead, which should therefore remain unaltered.
- 4.43 The southern boundary of sub-area 3, however, closely follows the built-up area around Washington/Usworth. Accordingly, land adjacent to that boundary has been assessed and the Council proposes two Housing Growth Area sites adjacent to that boundary. Having completed our review, we agree that those two sites represent excellent candidates for meeting housing needs in a sustainable location, without materially harming the strategic Green Belt role performed by sub-area 3. Below, we

provide our recommendations regarding the most appropriate Green Belt boundary for this part of Sunderland's Green Belt.

Our Assessment of HGA3 (SHLAA ref. 567) – North of High Usworth

- 4.44 The release of HGA3 provides the opportunity to straighten the Green Belt boundary. The site is bounded by Stone Cellar Road to the south, immediately beyond which is existing housing. HGA3 is adjoined to the east by a car park associated with the George Washington Mercure Hotel, with existing housing beyond, and the site is bordered to the north and west by the George Washington Golf Course and the A194(M), respectively. For these reasons, we agree that HGA3 represents a logical 'rounding-off' of the north-western extent of Usworth and does not represent a significant incursion into the open Green Belt beyond the line of the existing urban area.
- 4.45 The site is surrounded by an existing dense treeline, the northern part of which would represent an appropriate new, permanent Green Belt boundary. The car park to the east of the housing site should also logically be removed from the Green Belt when the boundary is revised, so as not to inadvertently create an unusual 'island' site which does not fulfil any meaningful Green Belt role. Furthermore, the release of HGA3 – in tandem with an amendment to the Green Belt boundary to the north east of Springwell, as described below under sub-area 4 – will create a new Green Belt boundary running west-east along the northern edge of Springwell and Usworth, but without fundamentally undermining the strategic function of this part of Sunderland's Green Belt.

Our Assessment of HGA4 (SHLAA site ref. 463A) – North of Usworth Hall

- 4.46 Whilst the Green Belt in this location is acknowledged to perform an important role in maintaining separation between Washington and Gateshead, HGA4 is sandwiched between the Northern Area Playing Fields to the west and the Leamside railway line to the east, with existing housing to the immediate south. Against that background we agree that the site's release for housing – up to the northern boundary as proposed, but not further – will not undermine the strategic function of the Green Belt in this part of Sunderland.
- 4.47 The proposed northern and eastern boundaries are currently somewhat arbitrary lines through the existing farmland. We therefore consider that the site's eastern boundary should be the eastern edge of the railway line, which will constitute a permanent defensible boundary. Land adjacent to our proposed eastern boundary is subject to flooding, but it is logical to take the railway line as the new boundary rather than drawing it slightly to the west to exclude the area affected by flooding.
- 4.48 A new treeline and/or dense vegetation would be required along the site's northern edge to create a new, defensible Green Belt boundary. The western site boundary already comprises dense woodland and is therefore already a robust and defensible boundary.

Other Changes to the Boundary of Sub-Area 3

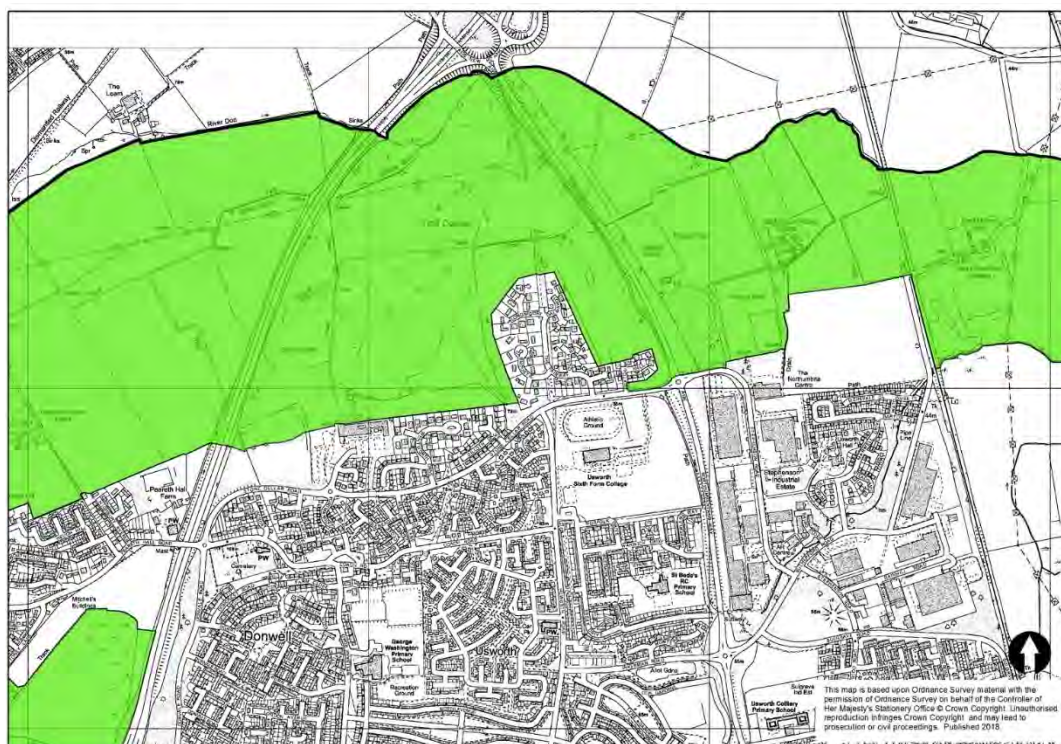
- 4.49 Our other recommended changes to the boundary of sub-area 3 are detailed in the following table.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
22	Land south of George Washington Golf Course	Addition to Green Belt	Extension to the Green Belt up to the edge of existing built development, to create a more defensible and logical boundary.	56
31	Land north of Foxton Hall	Deletion from Green Belt	Minor adjustment to the Green Belt boundary required to follow fence line of existing dwellings on the north side of Foxton Hall.	56

Summary

- 4.50 The amendments described above will ensure that a logical and robust Green Belt boundary is in place on the northern side of Usworth/Washington, which is capable of enduring so that a strategic gap is maintained between Sunderland and Gateshead. The following plan depicts the new proposed boundary in this part of the city.

Figure 4.5 Our Proposed New Green Belt Boundary for Sub-Area 3



Green Belt Sub-Area 4 – Springwell

Role Performed by the Sub-Area

- 4.51 The wider section of Green Belt around Springwell and to the north of Usworth provides the entire strategic separation between Washington and Gateshead. Much of the constituent land is therefore deemed to be fundamental to the purposes of the Sunderland Green Belt in terms of preventing the city merging with Gateshead. Accordingly, as with sub-areas 1, 2 and 3, there is no justification for removing Green

Belt land adjacent to the administrative boundary between Sunderland and Gateshead.

- 4.52 The Green Belt boundary is, however, tightly drawn around Springwell Village. The Green Belt Review recommended that the boundary encompassing Springwell should therefore be reconsidered, in order to ensure that the village has the potential to retain both its distinctive identity and its local facilities over the plan period and beyond. We support that recommendation.
- 4.53 Against the background outlined above, we support the release of the two proposed Housing Growth Area sites in Springwell which, for the reasons outlined below along with our recommended Green Belt boundary, would not undermine the strategic role of this part of Sunderland's Green Belt.

Our Assessment of HGA1 (SHLAA site ref. 407C) – South West Springwell

- 4.54 HGA1, which comprises a roughly square piece of greenfield land bounded to the north and east by existing housing in Springwell, bounded to the south and west by agricultural land in active use, would logically round-off the southern extent of Springwell.
- 4.55 Whilst the northern and eastern boundaries of the site are adjoined by existing housing, the western and southern boundaries will need appropriate reinforcement to create a permanent, defensible new Green Belt boundary. The southern boundary currently consists of wooden fencing and a treeline separating the site from the adjacent agricultural field, and that boundary should be bolstered through appropriate landscape treatment.
- 4.56 The proposed western boundary initially appears to be somewhat arbitrary, running through the centre of the field north to south, with no physical evidence on the ground suggesting an existing permanent boundary in that location. Including land to the west of the proposed western boundary of HGA1 would, however, result in various harmful effects, including the coalescence of Springwell with Eighton Banks and encroachment into a local green corridor. We therefore agree that the proposed boundary is appropriate, albeit it will need to be reinforced through the creation of a new treeline and/or dense vegetation to create a permanent, defensible new Green Belt boundary.

Our Assessment of HGA2 (SHLAA ref. 424) – East Springwell

- 4.57 HGA2 is also a roughly triangular piece of land located in the gap between the existing urban extent of Springwell and the A194(M). We therefore consider that it represents a logical infill site and that its release will not fundamentally affect the strategic function of the Green Belt in this part of the city.
- 4.58 The southern boundary of the site, which faces what would become the new edge of the Green Belt, comprises a weak metal fence and sparse hedgerow and would require reinforcement in the form of dense planting/new treeline or other appropriate treatment to create a new, permanent boundary.

- 4.59 A roughly rectangular area of land to the south of the proposed Housing Growth Area, adjacent to Stoney Lane, is proposed to be removed from the Green Belt and designated as Safeguarded Land. In our assessment, the eastern boundary of the rectangular piece of land provides a more logical and defensible Green Belt boundary, though it would still need to be bolstered by dense planting to strengthen the boundary further.

Other Changes to the Boundary of Sub-Area 4

- 4.60 Land to the north of Peareth Hall Road, which comprises a roughly triangular piece of land, contains existing private dwellings and driveways and so it is partially brownfield. Development at the site following its removal from the Green Belt would complete the filling in of a gap between the existing urban extent of Springwell and the A194(M) and, as with HGA1, the release of this modest site will not affect the strategic role of this part of Sunderland's Green Belt.
- 4.61 Furthermore, the release of this land will 'mirror' the similar logical filling-in to the east of the A194(M) which will be effected by the release of HGA3, thereby creating a new Green Belt boundary running west-east along the northern edge of Springwell and Usworth but without fundamentally undermining the strategic function of the Green Belt in this part of Sunderland. The northern boundary comprises dense woodland and would represent a defensible boundary.
- 4.62 Our other recommended changes to the boundary of sub-area 4 are detailed in the following table.

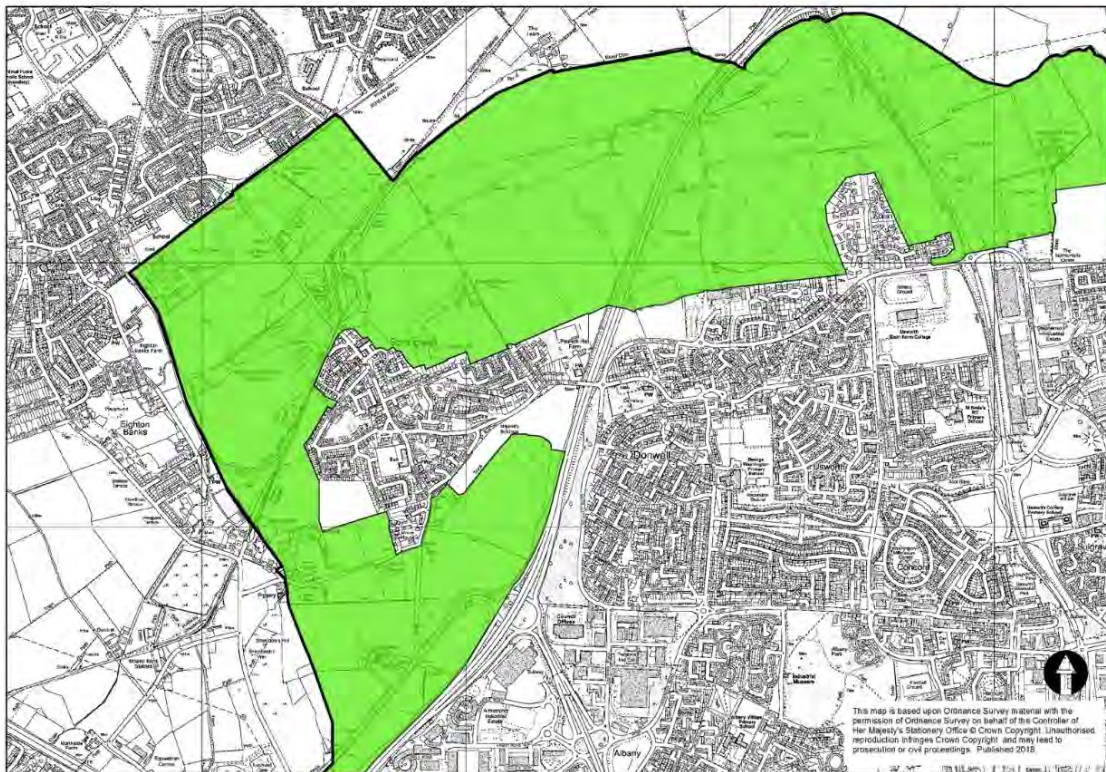
Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
21	Land north of Fairhaven	Addition to Green Belt	The Green Belt here currently cuts through middle of greenspace following no recognisable boundary. Minor adjustment required so that it follows the edge of Fairhaven and the playground adjacent to properties on Somerford.	55

- 4.63 The new boundaries referred to above remove the 'insetting' of Springwell Village, but the original gap between Springwell and Washington is already compromised at Peareth Hall Road.

Summary

- 4.64 The amendments described above will ensure that a logical and robust Green Belt boundary is in place on the northern and eastern side of Springwell, which is capable of enduring so that a strategic gap is maintained between Sunderland and Gateshead. The proposed new boundary in this part of the city is shown on the following plan.

Figure 4.6 Our Proposed New Green Belt Boundary for Sub-Area 4



Green Belt Sub-Area 5 – Hylton

Role Performed by the Sub-Area

- 4.65 This section of Sunderland's Green Belt – to the east of the A19, between North Hylton and South Hylton – performs a key role in maintaining a strategic green infrastructure corridor along the River Wear Estuary and preventing urban sprawl within that area. For those reasons, most of the land within sub-area 5 – in particular, the land closest to the river – is fundamental to the purposes of Sunderland's Green Belt and so it should not be released.
- 4.66 A section of land within the north-western part of sub-area 5 is proposed as a Housing Growth Area because its contribution to the Green Belt is deemed to be much lesser than other land within the sub-area. We agree that the site's release for housing will not undermine the strategic Green Belt role performed by the sub-area as a whole. Below, we provide our recommendations regarding what we consider to be the most suitable future Green Belt boundary for this sub-area.

HGA7 (SHLAA site ref. 416A) – North Hylton

- 4.67 The Green Belt Review concluded that, unlike land to the south and east, HGA7 does not perform a fundamental Green Belt role. We agree with that conclusion, given the site's containment to the north, west and east by existing roads, namely the A1231, the A19 and Ferryboat Lane, respectively.

- 4.68 Regarding the southern boundary, our assessment is that the existing treeline which runs in a roughly south-easterly direction from the adjacent roundabout would form a more logical boundary than the one currently shown on the Council's various plans, which is more arbitrary in nature, cutting through an existing field with no physical boundary present.
- 4.69 We agree that Ferryboat Lane represents an appropriate, natural and defensible south-eastern boundary to HGA7 and that the area of land to the east of Ferryboat Lane should remain open.
- 4.70 We therefore recommend that the proposed site boundary should be amended in line with our comments above. Whilst our proposed southern boundary is generally robust, it would benefit from additional planting in certain locations where the existing treeline is thinner than elsewhere.

Other Changes to the Boundary of Sub-Area 5

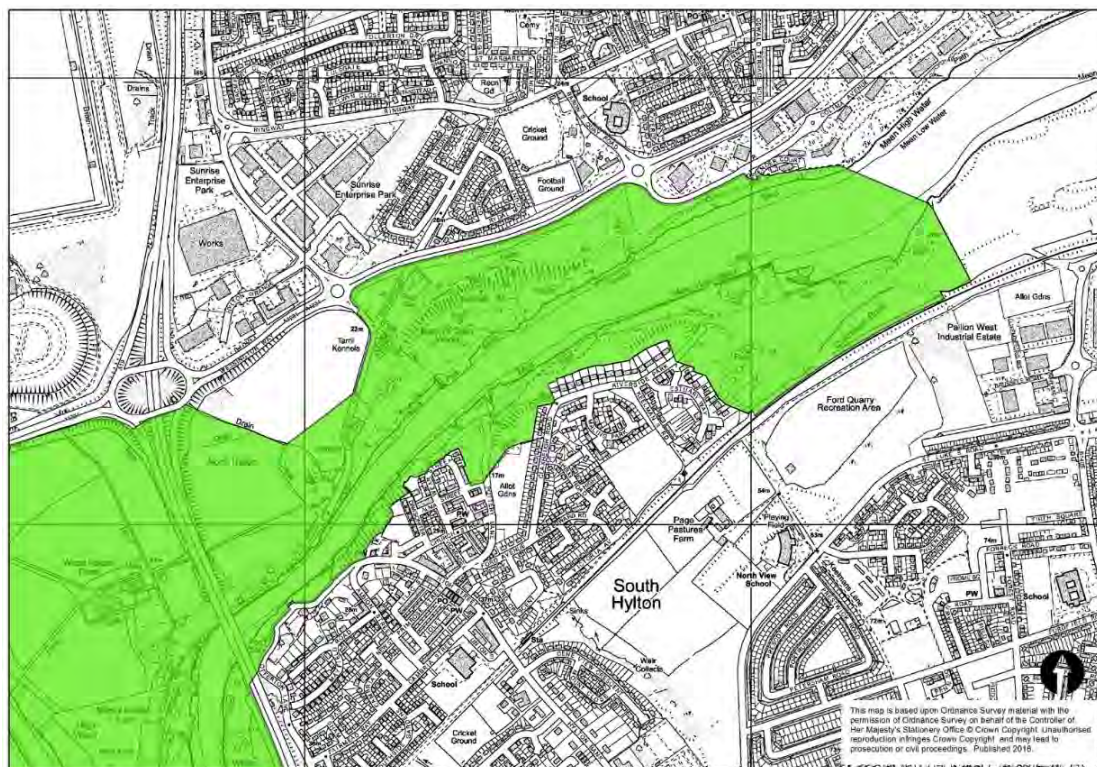
- 4.71 The following table provides details of our other recommended changes to the boundary of sub-area 5.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
6	Land west of Riverside Park	Addition to Green Belt	Suggested addition to Green Belt so that the boundary follows the edges of existing residential properties on Claxheugh Road/Riverside Park.	49
7	Land north of Riverside Park	Addition to Green Belt	Small slither of land to rear of property on the north side of Riverside Park - appears to be a mapping anomaly. More sensible for Green Belt boundary to follow the fence line to the rear of existing house.	49
8	Land east of Estuary Way	Addition to Green Belt	Suggested extension to the Green Belt boundary up to the rear of properties on the north-eastern side of Estuary Way. This would be more logical and defensible.	50
9	Land north of Pallion West Industrial Estate	Addition to Green Belt	Boundary anomaly - more logical to follow fence line of adjacent quarry site.	50
10	Land south of Colima Avenue	Addition to Green Belt	Current boundary cuts through area of green space - more logical to bring all this land within the Green Belt and create a more defensible and recognisable boundary following Colima Avenue.	50
27	Railway track north of Ford Quarry Recreation Area	Deletion from Green Belt	Isolated section of railway track currently within the Green Belt. More logical to remove this and create a new defensible boundary to the northern side of the track, aligning better with the existing Green Belt boundary to the east and west.	50

Summary

- 4.72 The amendments described above will ensure that a logical and robust Green Belt boundary is in place in this part of the city. The following plan shows the proposed new Green Belt boundary in this part of Sunderland.

Figure 4.7 Our Proposed New Green Belt Boundary for Sub-Area 5



Green Belt Sub-Area 6 – Pattinson and Low Barmston

Role Performed by the Sub-Area

- 4.73 This narrow section of Green Belt provides an important contribution to maintaining the separation of Washington from Houghton and Sunderland. The sub-area also supports wildlife corridors along the River Wear estuary. No Housing Growth Area sites are proposed within this sub-area and we conclude that no strategic changes to the existing boundary are justified.

Other Changes to the Boundary of Sub-Area 6

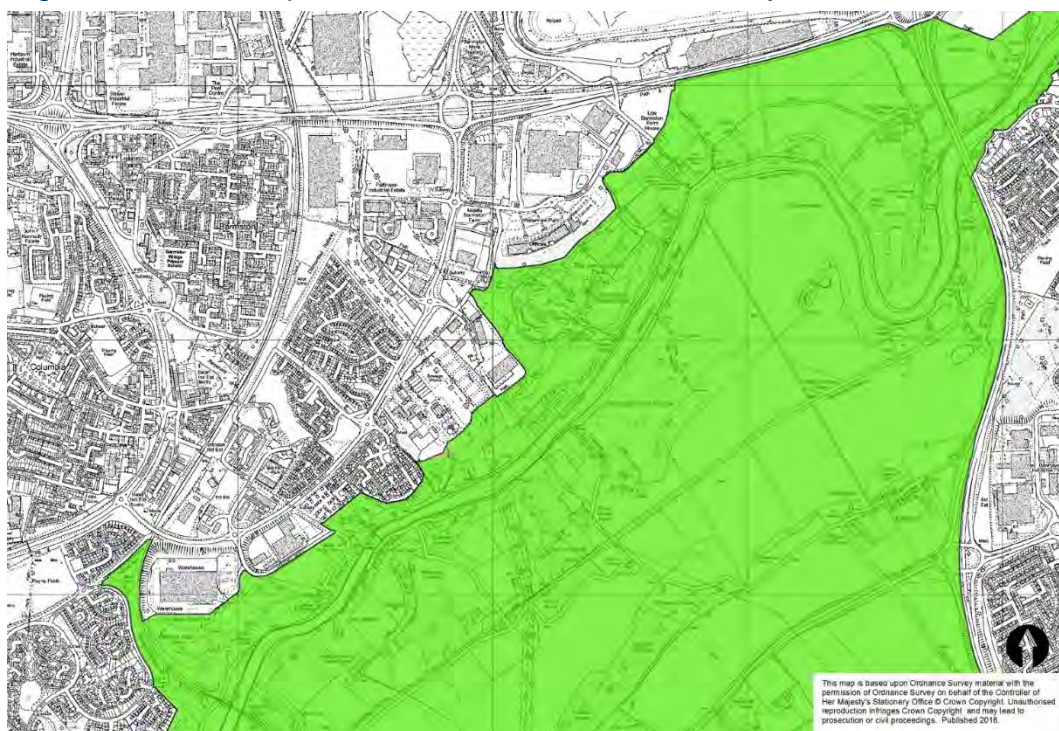
- 4.74 Our other recommended changes to the boundary of sub-area 6 are detailed in the following table.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
18	Land south of Asda warehouse, Staithes Road	Addition to Green Belt	Extension of the Green Belt up to the rear of the Asda warehouse, which is a more logical and defensible boundary.	53
19	Land south of Staithes Road	Addition to Green Belt	Extension of the Green Belt up to the southern side of Staithes Road, which is a more logical and defensible boundary.	53
20	Land at Toby Gill and north-east of Barmston Lane	Addition to Green Belt	Logical extension of the Green Belt to include greenspace around Toby Gill, up to boundary of adjacent field which is part of Pattinson North Industrial Estate.	54
28	Land south of Pattinson Road	Deletion from Green Belt	Residential development now on site, therefore land should be removed from the Green Belt and the southern woodland buffer will create a robust and defensible boundary.	53
29	Land north-east of Monument Park	Deletion from Green Belt	Current boundary cuts through industrial/commercial area - more logical to remove this from the Green Belt and create a new boundary following the edge of the existing built up area.	54

Summary

- 4.75 The changes outlined above will help to ensure that a logical and robust Green Belt boundary is in place eastwards from the former Leamside Line to the junction of the A1231/A19. The proposed new Green Belt boundary in this part of the city is shown on the following plan.

Figure 4.8 Our Proposed New Green Belt Boundary for Sub-Area 6



Green Belt Sub-Area 7 – Fatfield and Biddick Woods

Role Performed by the Sub-Area

- 4.76 As a whole, the section of the Green Belt around Fatfield and Biddick Woods prevents the coalescence of Washington and Penshaw (Houghton-le-Spring) and safeguards against countryside encroachment westwards into County Durham. All of the land within the narrow (approximately 500m) gap between Washington and Penshaw (Houghton) is therefore regarded as fundamentally important in Green Belt terms. Having completed our review, we concur with that conclusion.
- 4.77 HGA5 and HGA6, however, both represent sustainable housing sites and we agree with the Council's assessment that their release would not harm the strategic role of the Green Belt. Below, we provide our recommendations regarding the most appropriate future Green Belt boundary in this part of the city.

Our Assessment of HGA5 (SHLAA site ref. 673) – Fatfield

- 4.78 HGA5 is a roughly square piece of land within James Steel Park to the south east of the settlement of Harraton. Whilst the site's release would result in the loss of existing greenspace, it is situated between the existing settlement extent and the A182 to the south and west – and by the River Wear to the east – which would form permanent, defensible Green Belt boundaries.
- 4.79 We recommend that the entire section of land between the River Wear, the A182 and Bonemill Lane should be removed from the Green Belt. Whilst we acknowledge the presence of a children's play area and some existing buildings within the western area, if that section of land was not removed it would leave an isolated triangle of land which does not fulfil any meaningful Green Belt role.

Our Assessment of HGA6 (SHLAA site ref. 671) – Rickleton

- 4.80 HGA6 represents a sustainable housing site, located between existing built development within the southern part of Rickleton, and Durham's administrative boundary to the south.
- 4.81 The eastern boundary currently comprises a well-defined hedgerow and field boundary. Nevertheless, our view is that significant enhancement in the form of additional dense vegetation and/or trees will be required in order to create a more robust, defensible new Green Belt boundary. The proposed southern boundary will be permanent and defensible by virtue of the existing dense woodland immediately beyond (to the south) of the new boundary.

Other Changes to the Boundary of Sub-Area 7

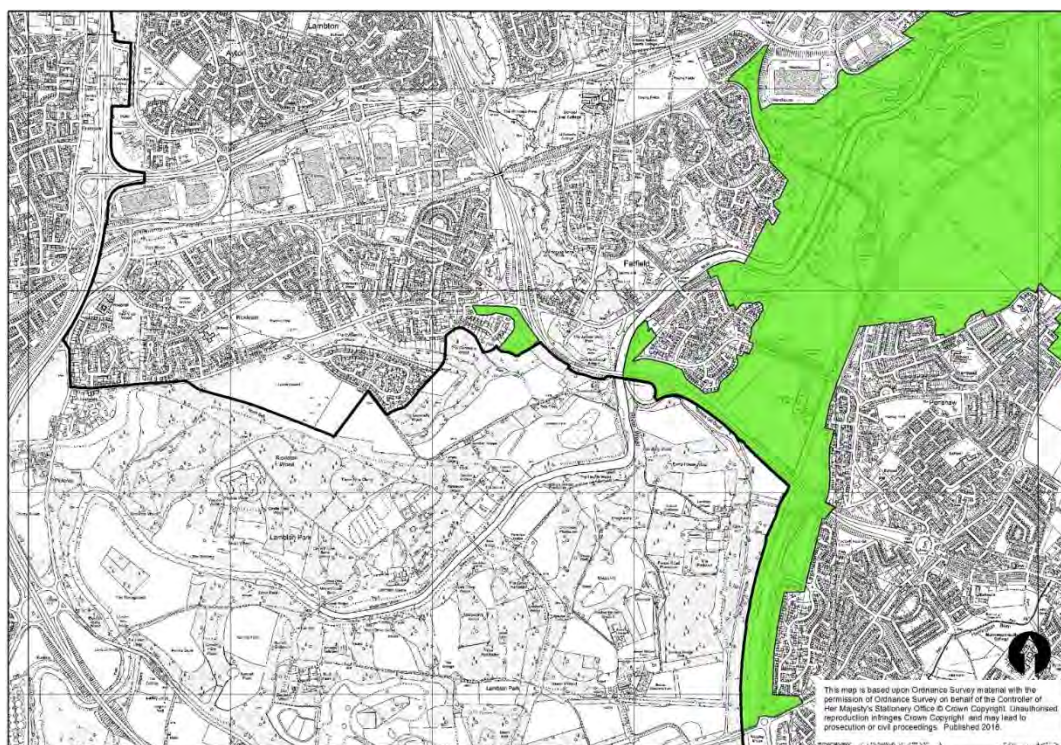
- 4.82 The following table provides details of our other recommended changes to the boundary of sub-area 7.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
11	Land north of Washington Highway	Addition to Green Belt	Open land to north of Washington Highway - more logical for Green Belt boundary to follow the rear of existing properties to the east, off Cross Rig Close/Langhope/Byehope/Kingswood.	63
13	Land north of East Bridge Street	Addition to Green Belt	Extension of the Green Belt up to the River Wear, which is a more logical and defensible boundary.	52
14	Land south-west of West Bridge Street	Addition to Green Belt	Extension of the Green Belt up to the edge of the existing property at the end of West Bridge Street, which is a more logical and defensible boundary.	52
15	Land south of Washington Highway	Addition to Green Belt	Isolated open space currently inset from the Green Belt - probably a mapping error and should be included within the Green Belt.	52
16	Land east of The Generals Wood	Addition to Green Belt	Isolated open space currently inset from the Green Belt - probably a mapping error and should be included in the Green Belt.	52
17	Land north of The Generals Wood	Addition to Green Belt	Extension of Green Belt woodland area up to Bonemill Lane and the rear boundary of properties on The Generals Wood, which is a more logical and defensible boundary.	52

Summary

- 4.83 The amendments described above will ensure that a logical and robust Green Belt boundary is in place in this part of the city. The proposed new boundary in this part of the city is shown on the following plan.

Figure 4.9 Our Proposed New Green Belt Boundary for Sub-Area 7



Green Belt Sub-Area 8 – Cox Green, Offerton and Penshaw

Role Performed by the Sub-Area

- 4.84 This part of Sunderland's Green Belt – contained by the A19 to the east, the A183 to the south and the River Wear to the north – prevents Houghton-le-Spring from merging with Sunderland and Washington. The sub-section also supports major green infrastructure corridors.
- 4.85 For the reasons summarised above, the overwhelming majority of land within sub-area 8 is fundamental to the purposes of Sunderland's Green Belt. A handful of sites around the northern edge of Penshaw were considered in the Green Belt Review but were discounted for availability and other reasons.
- 4.86 Accordingly, there are no proposed Housing Growth Area sites within sub-area 8 and, in our assessment, there is no justification for making strategic amendments to this part of Sunderland's Green Belt.

Other Changes to the Boundary of Sub-Area 8

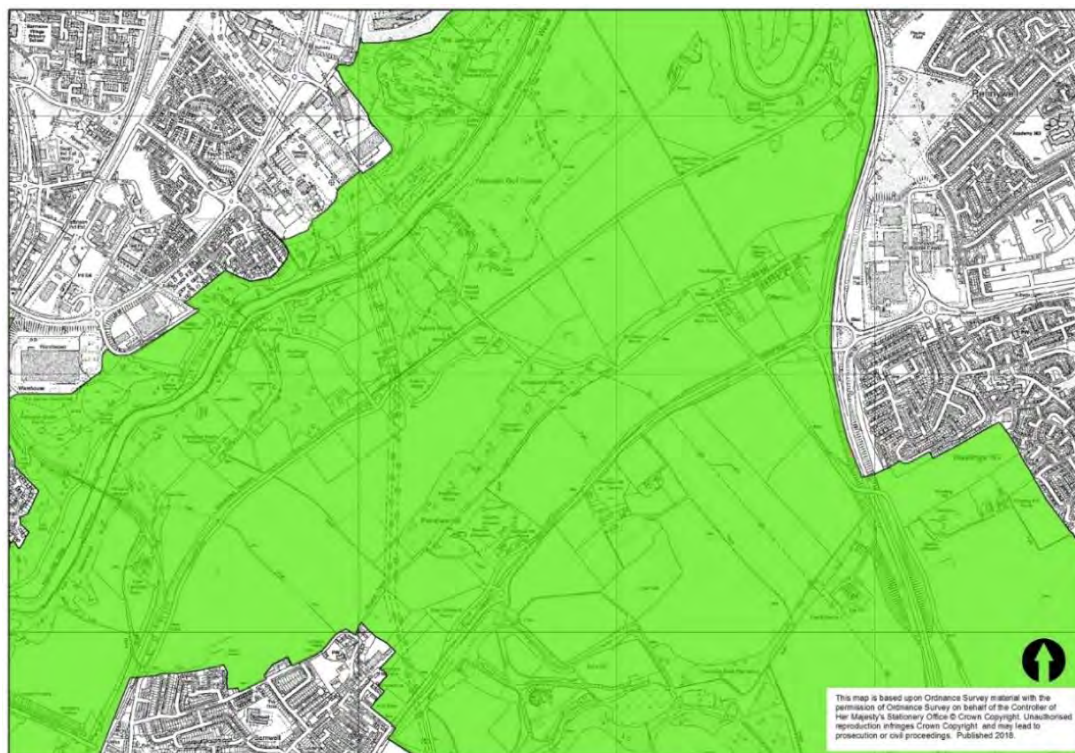
- 4.87 Our other recommended changes to the boundary of sub-area 8 are detailed in the following table.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
36	Valley View Care Home	Deletion from Green Belt	Land is occupied by a care home and should be removed from the Green Belt.	62

Summary

- 4.88 The plan below shows how the future Green Belt will look in this part of the city following the change referred to above.

Figure 4.10 Our Proposed New Green Belt Boundary for Sub-Area 8



Green Belt Sub-Area 9 – New and West Herrington

Role Performed by the Sub-Area

- 4.89 This part of Sunderland's Green Belt – to the west of the A19, east of the A183 and incorporating Herrington Country Park – prevents Sunderland from merging with Houghton-le-Spring, and helps to maintain a strategic green infrastructure corridor that links the River Wear Estuary to the north and South Hetton to the south.
- 4.90 For the reasons summarised above, most of the land within the sub area 8 is considered to be fundamental to the purposes of Sunderland's Green Belt. We concur with those conclusions. In our assessment, there is no justification for strategic boundary adjustments to this part of Sunderland's Green Belt aside from the required adjustment to facilitate the release of HGA9.

Our Assessment of HGA9 (SHLAA site ref. 465) – Penshaw

- 4.91 Currently an agricultural field, HGA9 is a square-shaped 'rounding-off' site located to the immediate north-east of Penshaw, well-related to extensive existing housing to the immediate west and south. The site is currently bounded by wire fencing and Chester Road to the west, a dense hedgerow and Chislehurst Road to the south, and fencing/hedgerow to the north.
- 4.92 The existing boundaries to the north and east are moderately strong but will need to be reinforced to create a more permanent, defensible new Green Belt boundary. In particular, the fencing/hedgerow along the site's northern boundary will require significant bolstering, and whilst the treeline adjacent to the fencing along the site's eastern edge is denser it will also require enhancement. Furthermore, we consider that the fencing/treeline will constitute a more appropriate eastern boundary than the adjacent (Herrington Burn), which is not easily identifiable along the whole boundary.

Other Changes to the Boundary of Sub-Area 9

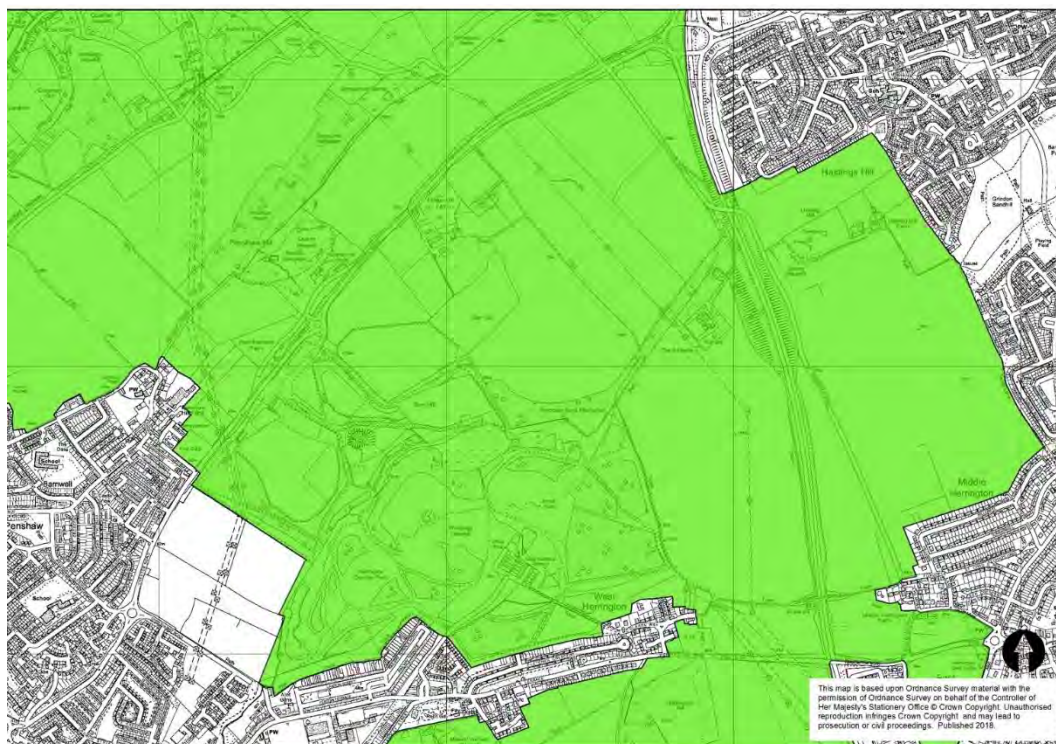
- 4.93 The following table provides details of our other recommended changes to the boundary of sub-area 9.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
4	West Herrington Cemetery	Addition to Green Belt	Green Belt boundary currently cuts through the middle of cemetery area. It would be more logical to include the whole cemetery within the Green Belt and create a new boundary up to McClaren Way.	45
5	Rear of Margaret Terrace	Addition to Green Belt	Minor amendment to address anomaly where the Green Belt boundary arbitrarily cuts through an area of open space. Suggested new boundary to the rear of Margaret Terrace and north of existing track.	48
33	West of McClaren Way	Deletion from Green Belt	Minor adjustment to regularise Green Belt boundary to exclude new build dwelling.	45
34	North of McClaren Way	Deletion from Green Belt	Minor adjustment to exclude private residential garden from the Green Belt and follow the fence line of this property.	45

Summary

- 4.94 The changes outlined above will help to ensure that a logical and robust Green Belt boundary is in place in this part of the city. The amended boundary is shown on the following plan.

Figure 4.11 Our Proposed New Green Belt Boundary for Sub-Area 9



Green Belt Sub-Area 10 – Middle Herrington

Role Performed by the Sub-Area

- 4.95 This section of Sunderland's Green Belt – between the western edge of Sunderland's urban area and the A19 – helps to prevent Sunderland from merging with Houghton-le-Spring. The sub-area also supports major green infrastructure corridors.
- 4.96 The existing boundary on the western edge of Grindon, south to Thorney Close, running south following the built-up area at Middle Herrington and bounding West Park – provides a logical and defensible boundary and there is no justification for making strategic amendments to this part of Sunderland's Green Belt boundary in our assessment.
- 4.97 There are no proposed Housing Growth Areas within sub-area 10.

Other Changes to the Boundary of Sub-Area 10

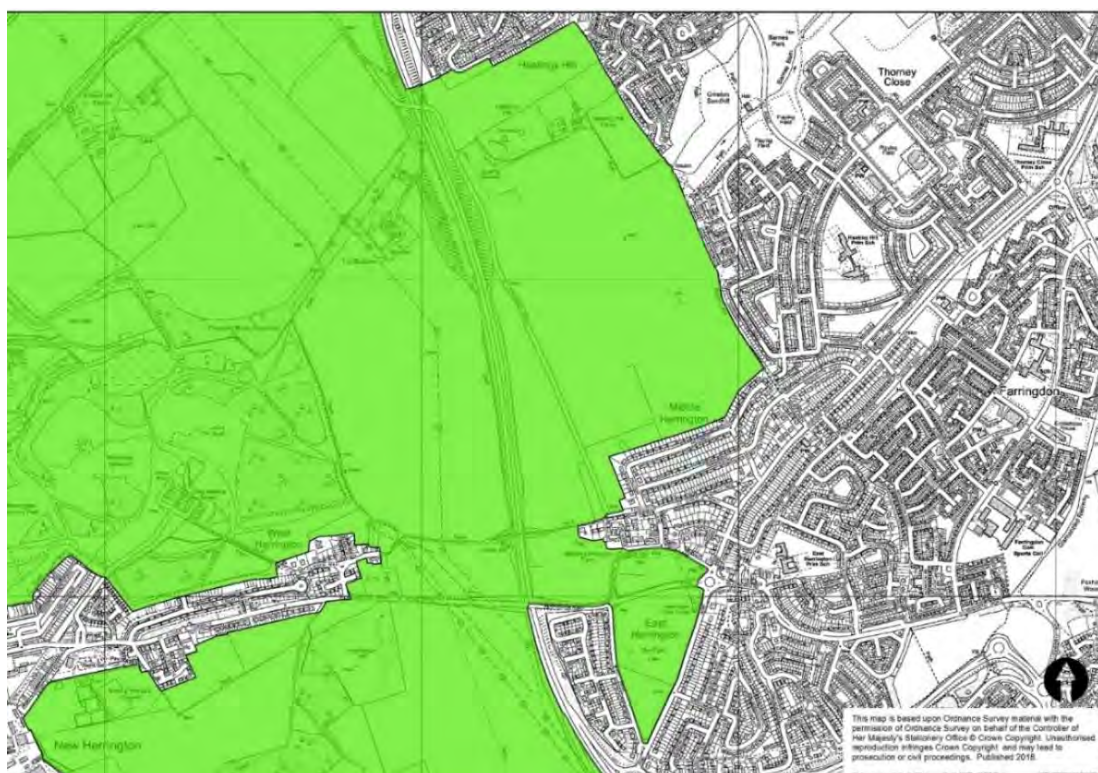
- 4.98 Our recommended changes to the boundary of sub-area 10 are detailed in the following table.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
26	Land west of the Mews	Deletion from Green Belt	Land has been developed for housing and should be removed from the Green Belt.	59

Summary

- 4.99 The amendment described above will help to ensure that a logical and robust Green Belt boundary is in place on the western side of Sunderland's urban area. The following plan provides an illustration of the proposed new Green Belt boundary in this part of the city.

Figure 4.12 Our Proposed New Green Belt Boundary for Sub-Area 10



Green Belt Sub-Area 11 – Houghton

Role Performed by the Sub-Area

- 4.100 Sub-area 11 is situated between Sunderland to the east and Houghton-le-Spring to the west, and it performs an important role in preventing those settlements from merging. Notwithstanding the important Green Belt role performed by sub-area 11, there are two proposed Housing Growth Areas within the sub-area. Our recommended amendments to the Green Belt boundary to facilitate the release of those two sites, and our other suggested boundary changes in this sub-area, are provided below.

Our Assessment of HGA10 (SHLAA site ref. 113) – New Herrington

- 4.101 HGA10 is a small site which currently accommodates the grounds of New Herrington Workingmen's Club within a gap between housing to the west and east at Langley Street and Kirkside, respectively. Further residential uses are located to the north of

the site and so we regard this as a logical housing site, the release of which will not materially harm the purposes of the extensive area of Green Belt to the south.

- 4.102 The existing, mature treeline along the site's southern boundary represents a logical, robust and defensible boundary.

Our Assessment of HGA11 (SHLAA site ref. 330B) – Philadelphia

- 4.103 HGA11 is adjacent to Philadelphia Industrial Estate (to the north) and further built development to the west, both of which form hard boundaries on those sides.
- 4.104 In our assessment, the site's eastern and southern boundaries should be amended to create a more rectangular (and therefore logical and developable) site. Our suggested site boundaries are depicted graphically on a plan within Appendix C. A new, permanent, defensible boundary will need to be created along the eastern and southern boundaries given that the site presently comprises open agricultural fields.

Other Changes to the Boundary of Sub-Area 11

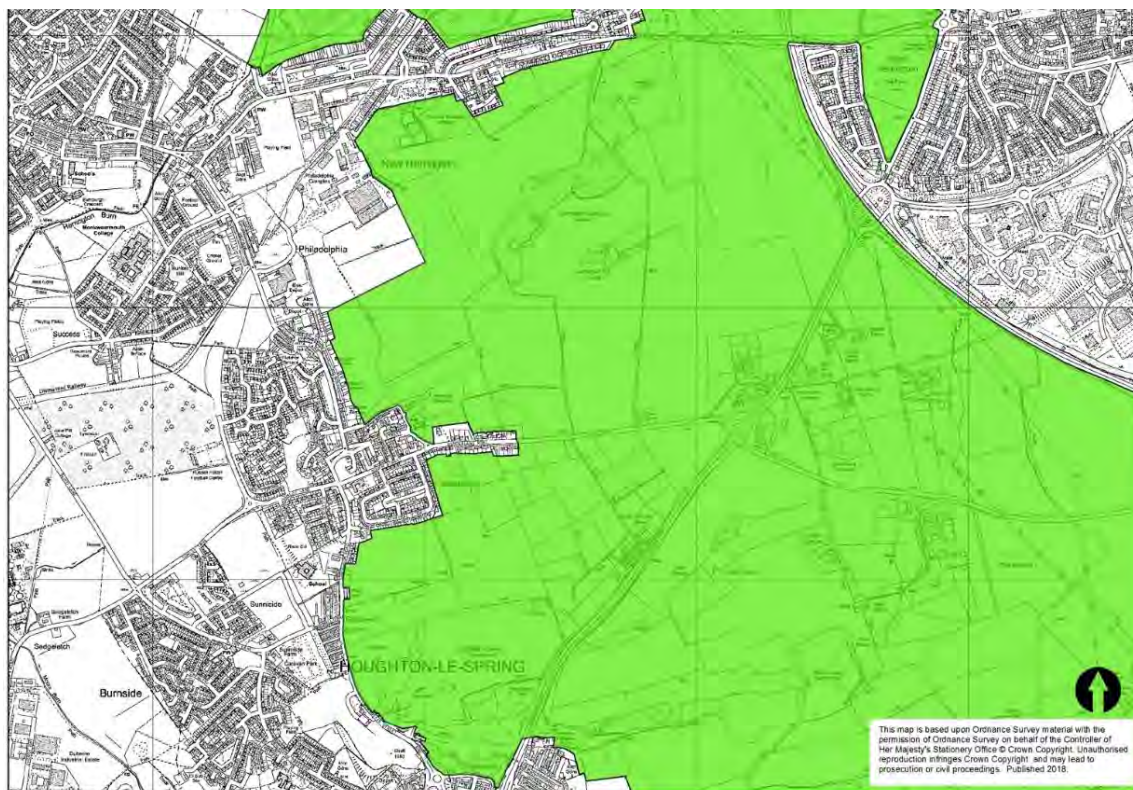
- 4.105 The following table provides details of our other recommended changes to the boundary of sub-area 11.

Site Ref.	Address	PBA Recommendation	Justification	Appendices Page No
1	Land south of St Aidans Terrace	Addition to Green Belt	Minor adjustment to address anomaly - more logical for the Green Belt boundary to follow St Aidans Terrace to the north and the existing track to the west.	45
2	Land east of North Street	Addition to Green Belt	Amendment to the Green Belt boundary to include the church, graveyard and adjacent land. A new boundary at North Street/Front Street and to the rear of the properties to the north of Sunderland Road will be more defensible and logical.	46
3	Land north of Houghtonside	Addition to Green Belt	Addition to Green Belt here will create a more logical and defensible boundary following Houghtonside and Newbottle Street.	47
35	West of Herrington Mews	Deletion from Green Belt	Land is occupied by a dwelling and should be removed from the Green Belt.	61

Summary

- 4.106 The changes outlined above will help to ensure that a logical and robust Green Belt boundary is in place in this part of the city, capable of enduring in order to prevent Sunderland and Houghton-le-Spring from merging. The amended boundary is shown on the following plan.

Figure 4.13 Our Proposed New Green Belt Boundary for Sub-Area 11



Green Belt Sub-Area 12 – Warden Law

Role Performed by the Sub-Area

- 4.107 Sub-area 12 performs an important role in preventing Sunderland to the east from merging with Houghton-le-Spring to the west. The sub-section also supports major green infrastructure corridors. In our assessment, there is no basis to make any strategic boundary changes to this part of Sunderland's Green Belt.
- 4.108 There are no proposed Housing Growth Area sites within sub-area 12. A handful of sites around the eastern edge of Houghton were considered in the Green Belt Review but were discounted for availability and other reasons.

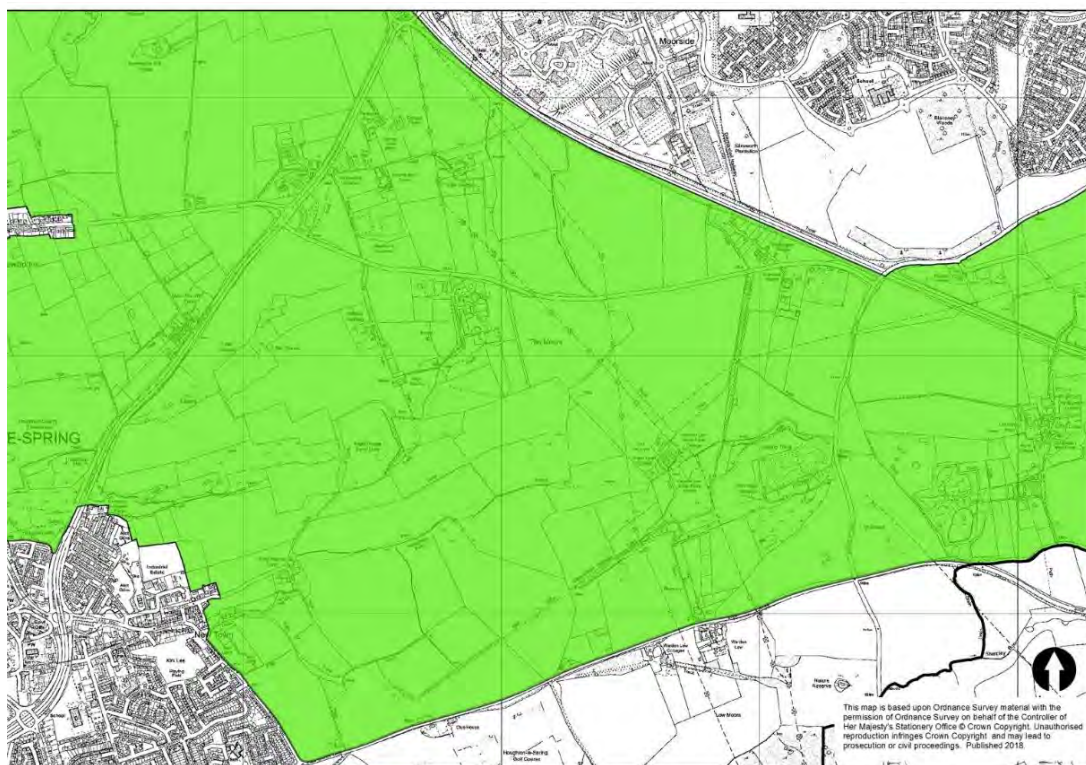
Other Changes to the Boundary of Sub-Area 12

- 4.109 We do not have any other recommended changes to the boundary of sub-area 12.

Summary

- 4.110 We do not recommend any changes to this part of Sunderland's Green Belt, which is depicted on the following plan.

Figure 4.14 Sub-Area 12 (no amendments proposed)



Green Belt Sub-Area 13 – Burdon and South Ryhope

Role Performed by the Sub-Area

- 4.111 Sub-area 13 performs an important role in helping to prevent Sunderland merging with Seaham in County Durham. The sub-section also supports major green infrastructure corridors. In our assessment, there is no justification for strategic amendments to this part of Sunderland's Green Belt boundary.
- 4.112 There are no proposed Housing Growth Area sites within sub-area 13. A handful of sites within the eastern part of the sub-area were considered in the Green Belt Review but were discounted for availability and other reasons.

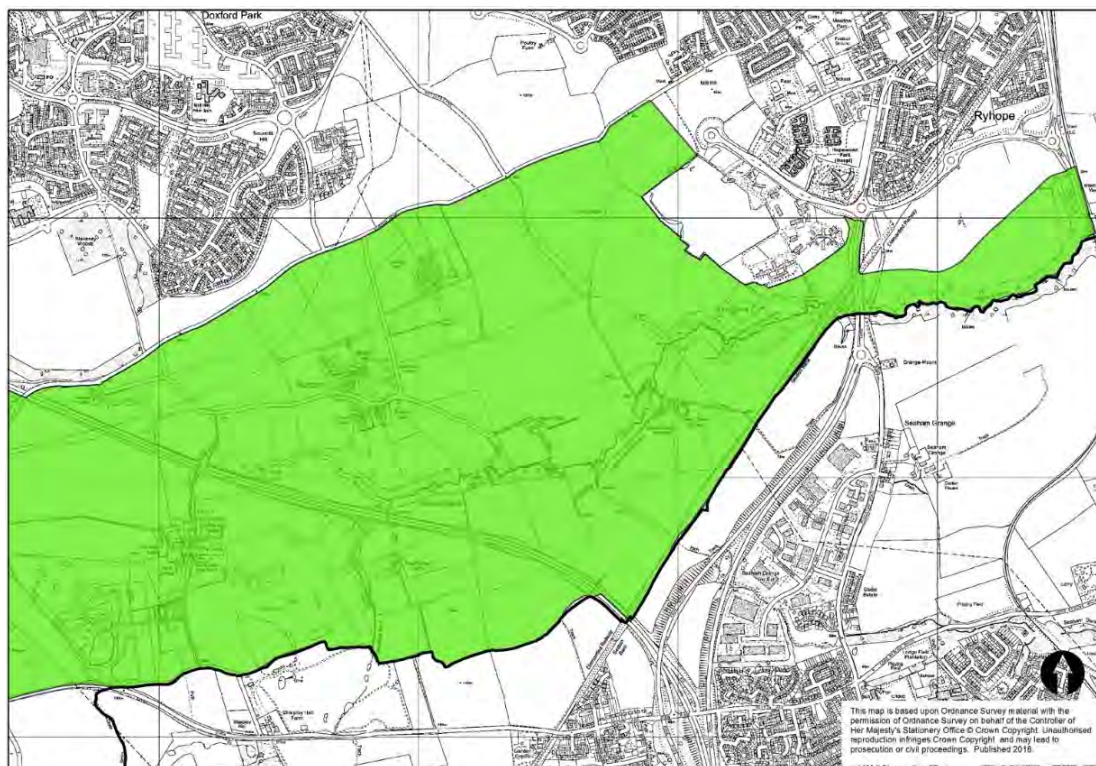
Other Changes to the Boundary of Sub-Area 13

- 4.113 We do not have any other recommended changes to the boundary of sub-area 13.

Summary

- 4.114 As with sub-area 12, we do not recommend any changes to this part of Sunderland's Green Belt, which is depicted on the following plan.

Figure 4.15 Sub-Area 13 (no amendments proposed)



Boundary Assessment – Overall Summary

- 4.115 In this section, we have provided the findings from our comprehensive review of the entire Sunderland Green Belt. Having considered role performed by each of the 13 sub-areas, we have provided our recommendations regarding the boundaries for the 11 proposed Housing Growth Areas, as well as the boundary for the proposed Safeguarded Land. We have also suggested various other adjustments to the Green Belt, which includes both additions and deletions.
- 4.116 Our proposed amendments have been incorporated into an overall new proposed Green Belt boundary for Sunderland, which we have provided to the Council separately in digital form and a summary plan is contained within the Appendices to this report for ease of reference.
- 4.117 We believe that the amended Green Belt boundary we have recommended – which takes account of the Green Belt roles performed by each of the 13 sub-areas and constituent land parcels, physical features on the ground and existing/potential durable boundaries – is robust and represents an appropriate new Green Belt boundary for Sunderland.

APPENDIX A SITE ASSESSMENT PRO-FORMA

SITE VISIT PROFORMA

SITE REFERENCE:

SITE NAME:

1: SITE BOUNDARIES

A: *Describe all main boundary features in detail. To what extent are the existing boundaries durable/permanent/defensible? Does the boundary need enhancing to make it more permanent/durable/defensible – and if so then what might be appropriate?*

B: *Does the new proposed Green Belt boundary make sense on the ground? How does it relate to the existing urban area and the surrounding landscape? Would the boundary constitute 'rounding-off' or an 'infill' site – or would it represent an incursion into the Green Belt?*

C: *Does the proposed new boundary need to be amended taking into account the above (i.e. additional land included/excluded)? If so, then show on plan and explain below.*

2: GENERAL SITE OBSERVATIONS

Any other observations – do we agree that the site appears to be a logical Green Belt release site, or are there any other observations that would contradict this conclusion?

APPENDIX B PHOTOGRAPHS OF THE HOUSING GROWTH AREAS

HGA1: South West Springwell





HGA2: East Springwell





HGA3: North of High Unsworth





HGA4: North of Usworth Hall





HGA5: Fatfield





HGA6: Rickleton





HGA7: North Hylton





HGA8: Fulwell





HGA9: Penshaw





HGA10: New Herrington





HGA11: Philadelphia



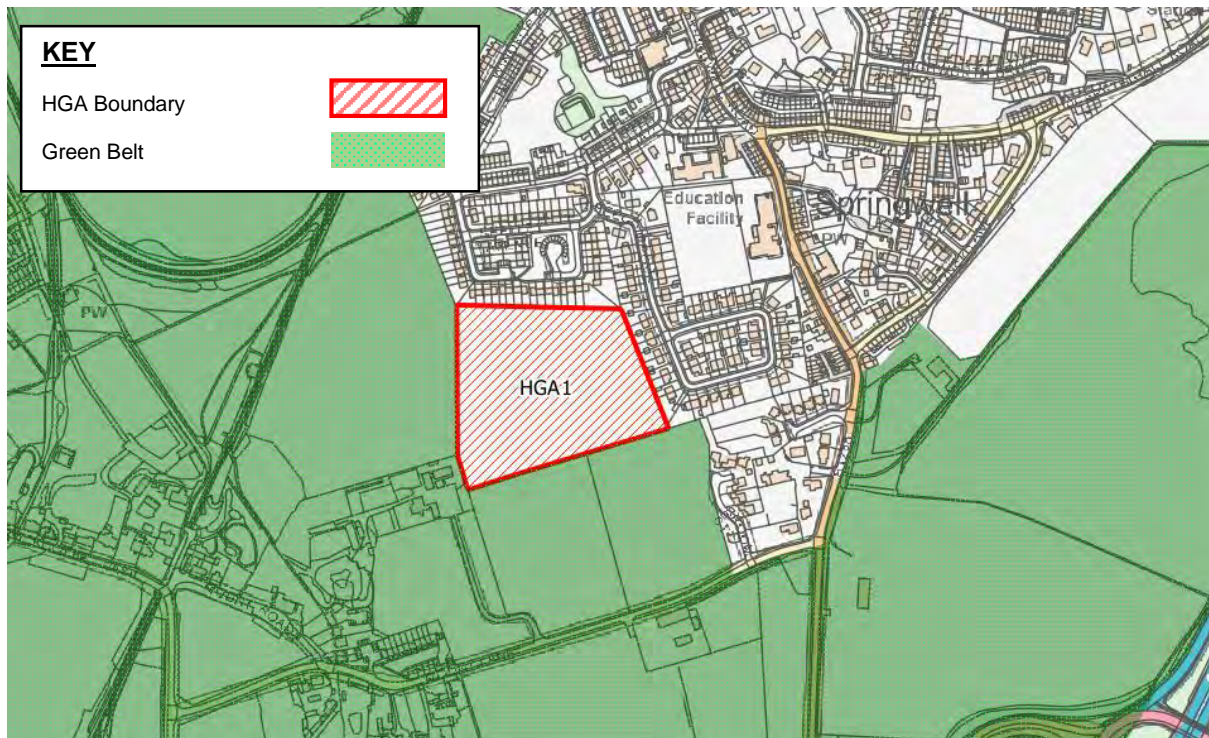


APPENDIX C HOUSING GROWTH AREAS – PBA’S PROPOSED BOUNDARY AMENDMENTS

HGA 1: 'South West Springwell'

No proposed amendments

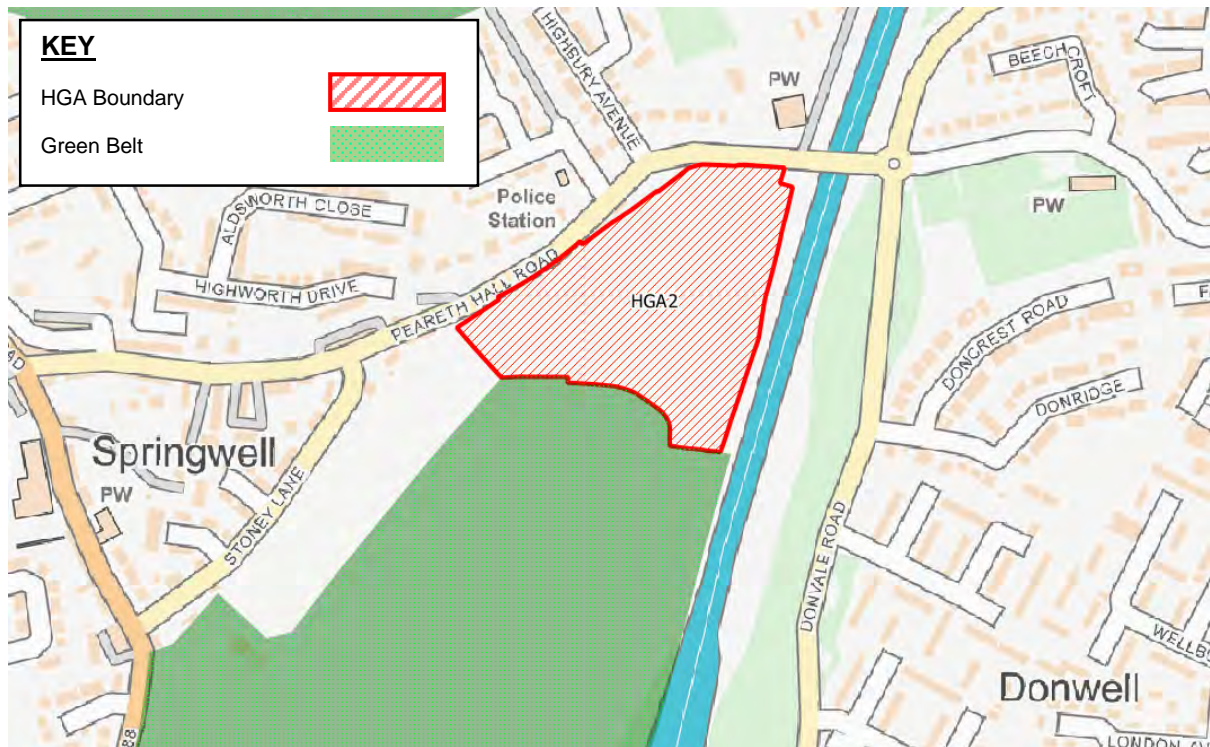
HGA boundary:



HGA 2: 'East Springwell'

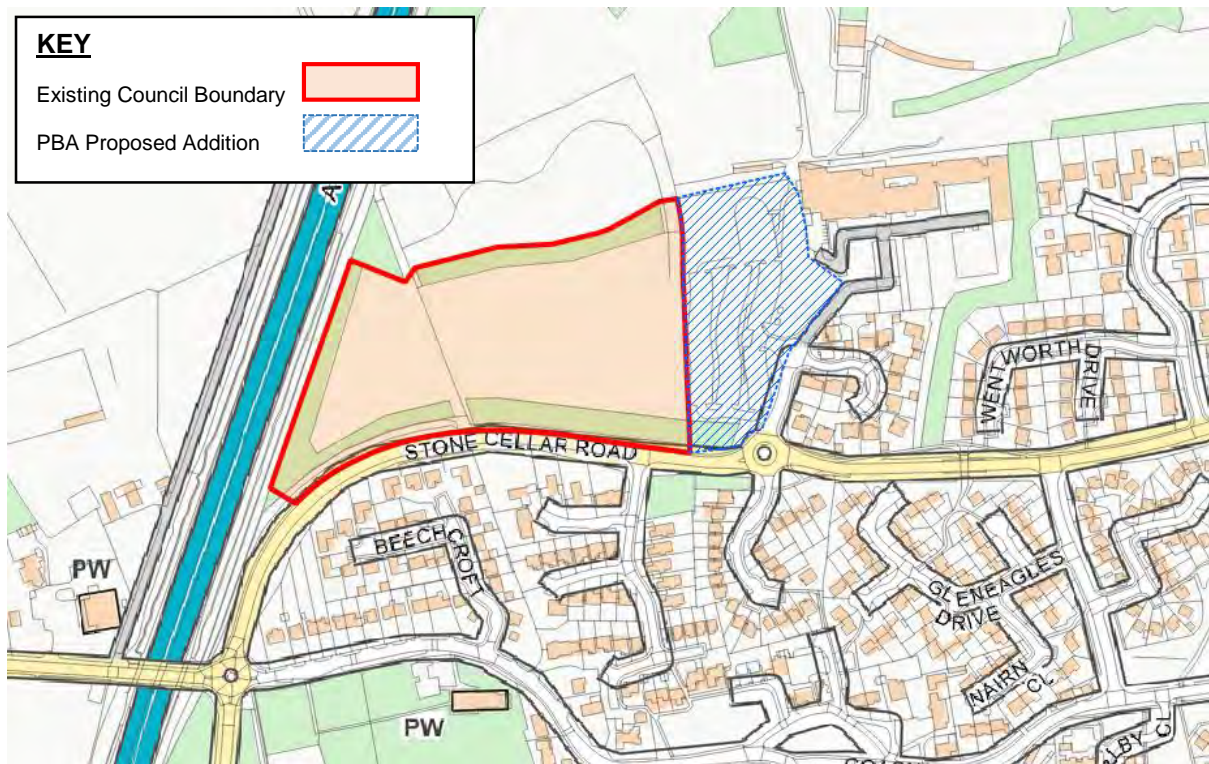
No proposed amendments

HGA boundary:

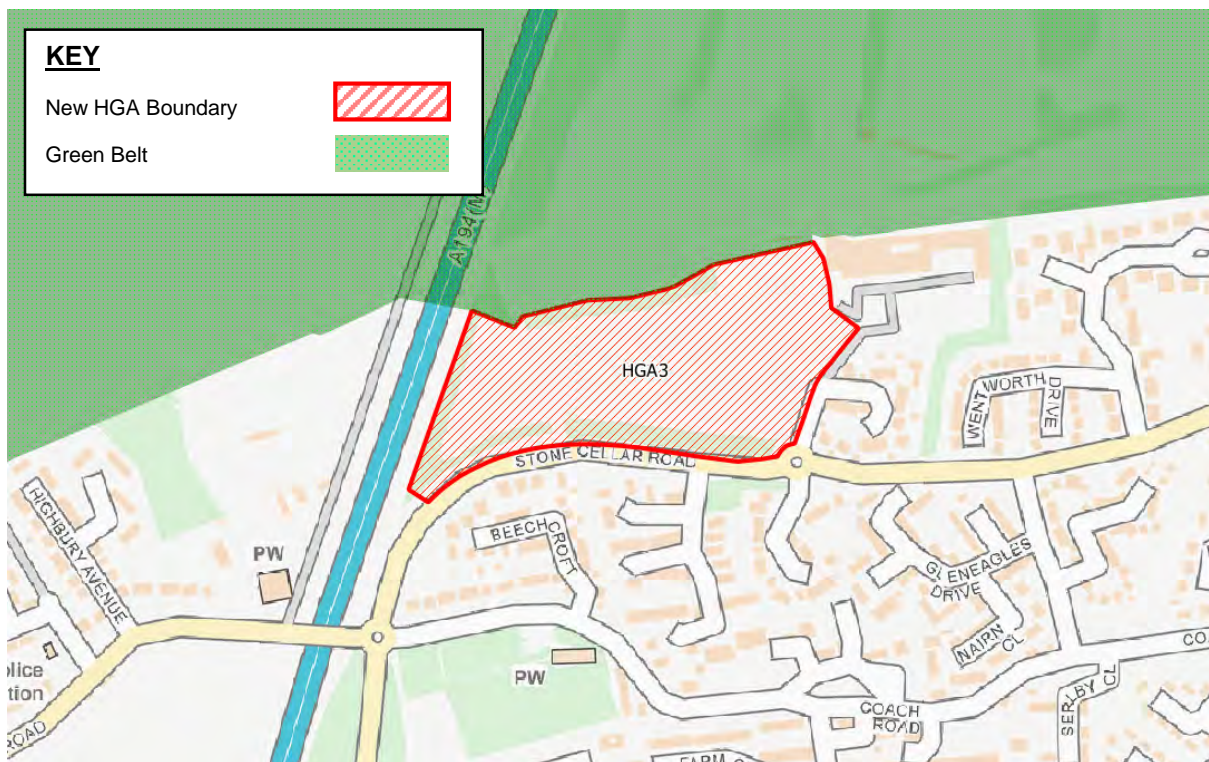


HGA 3: 'North of High Usworth'

PBA proposed amendment to HGA boundary:

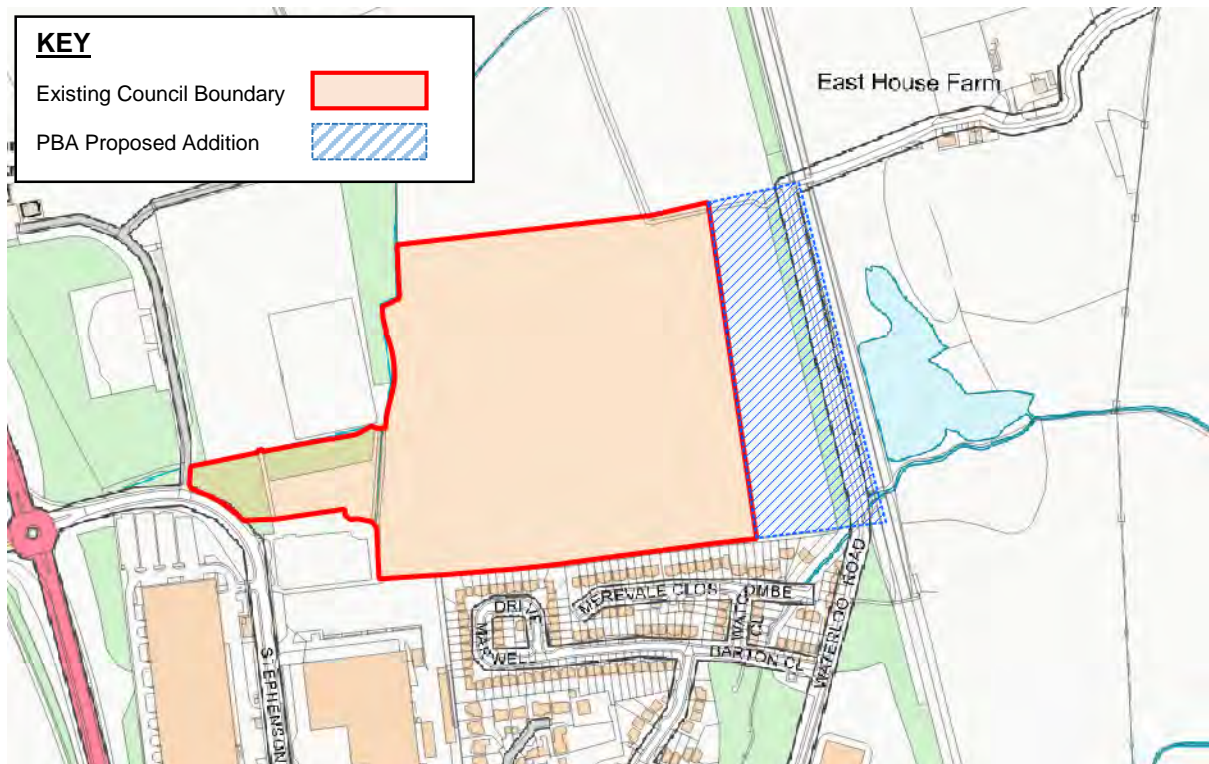


Updated HGA boundary:

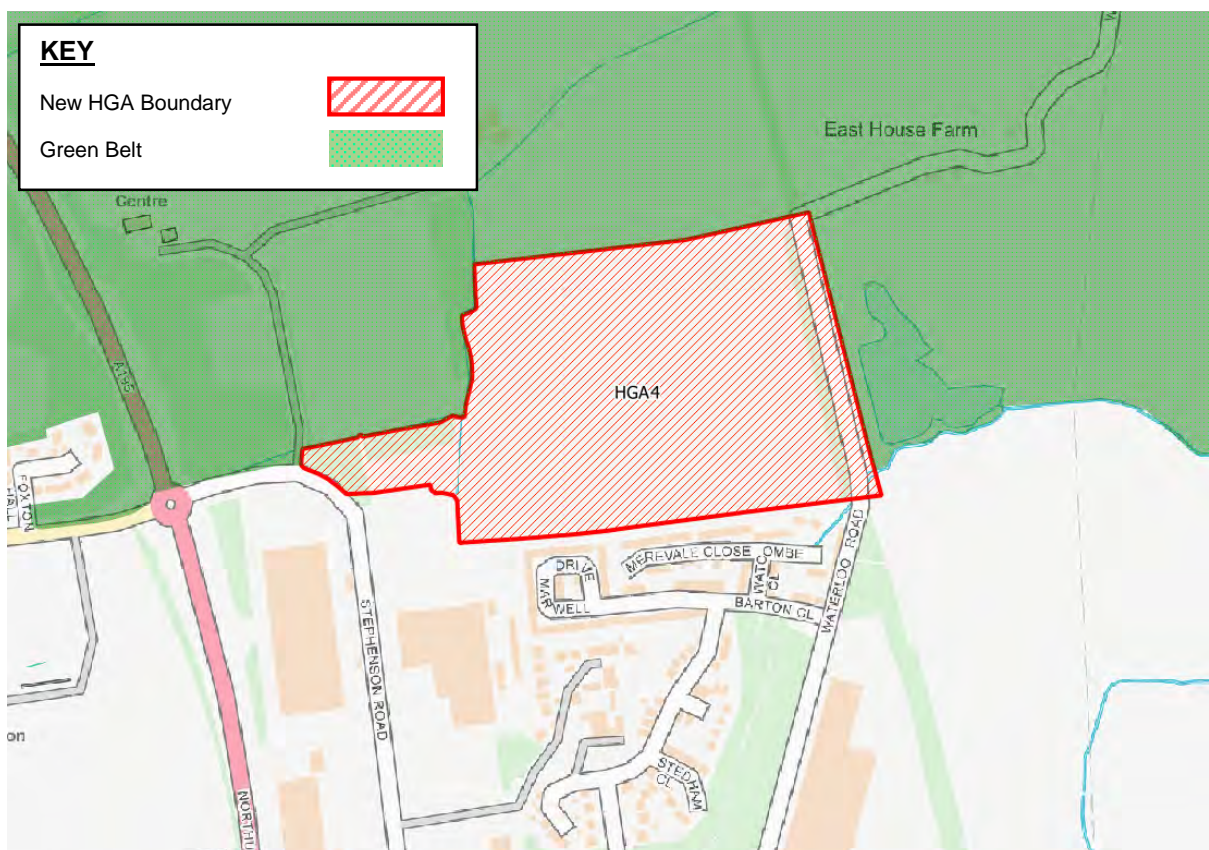


HGA 4: 'North of Usworth Hall'

PBA proposed amendment to HGA boundary:

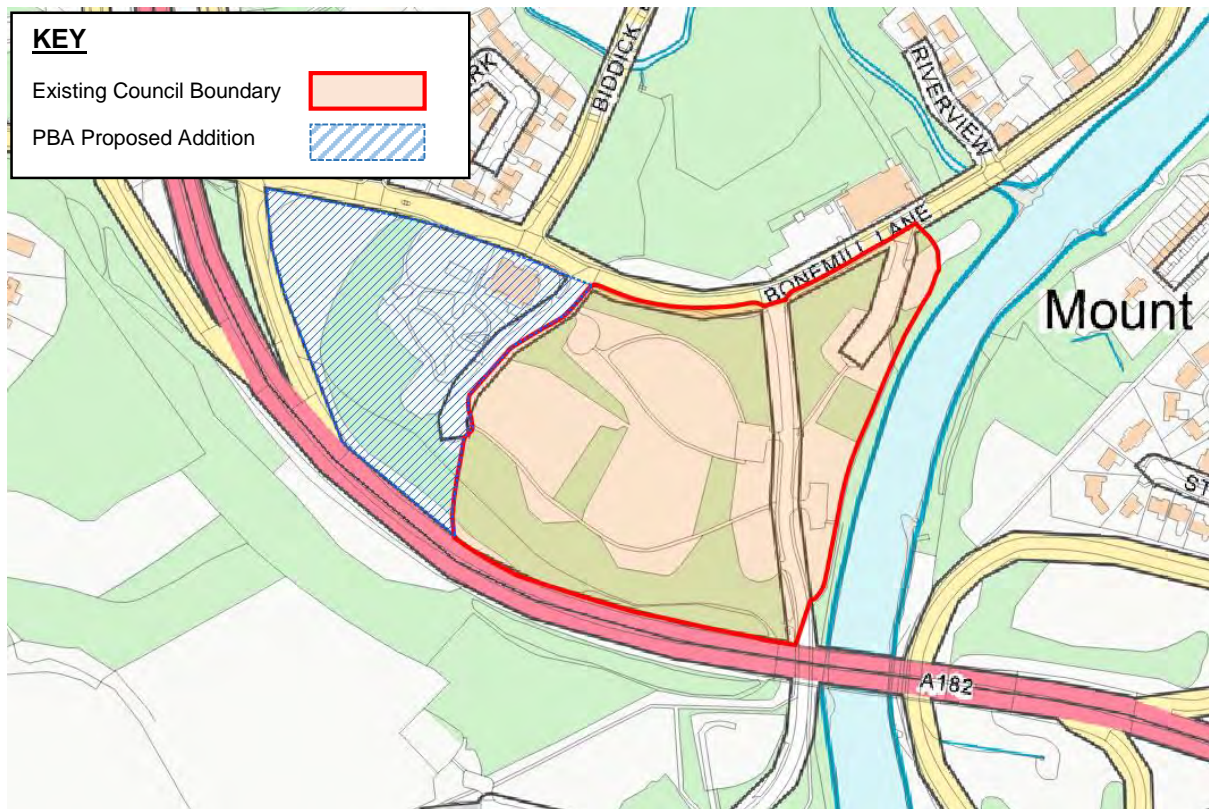


Updated HGA boundary:

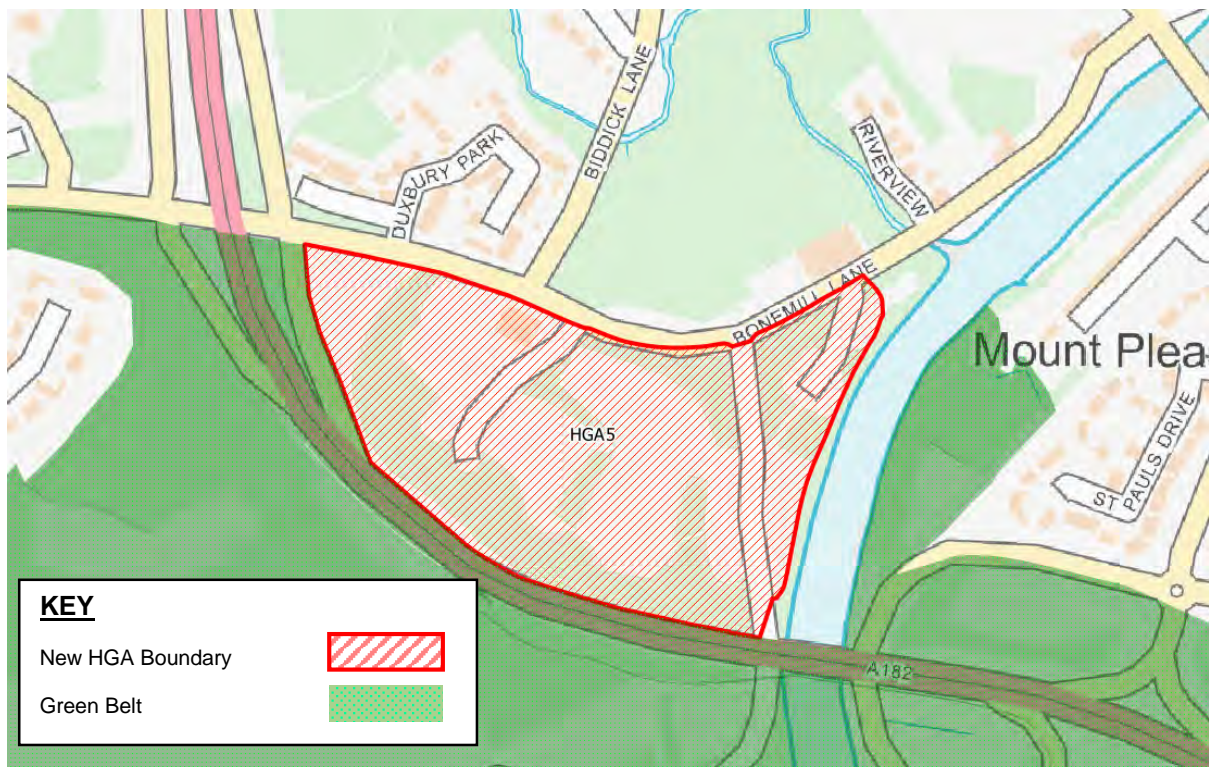


HGA 5: 'Fatfield'

PBA proposed amendment to HGA boundary:



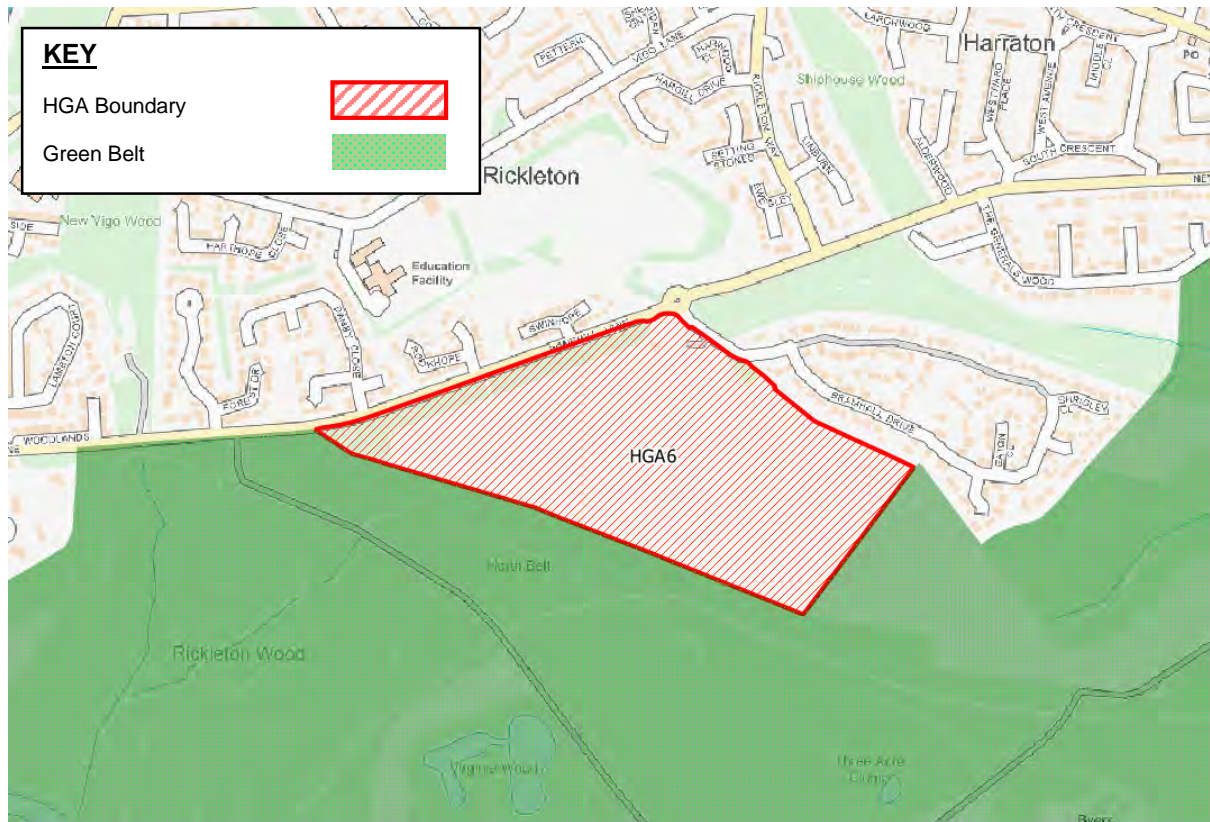
Updated HGA boundary:



HGA 6: 'Rickleton'

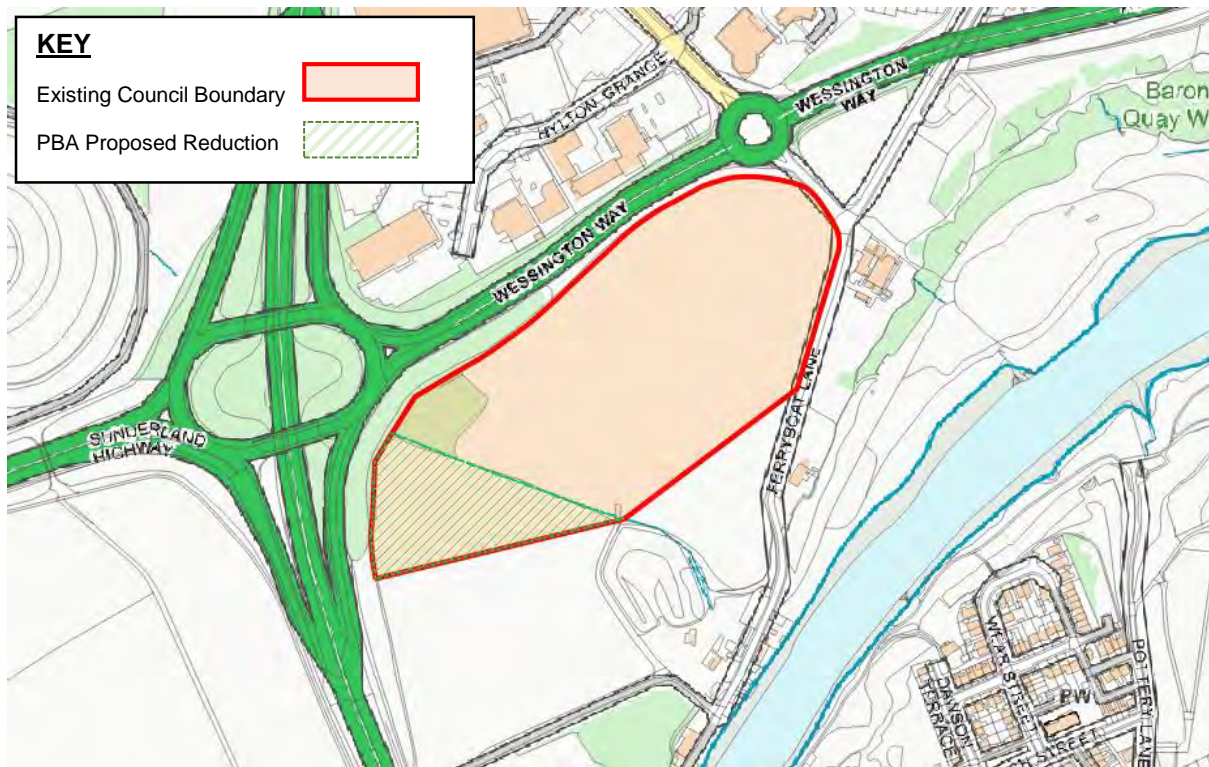
No proposed amendments

HGA boundary:

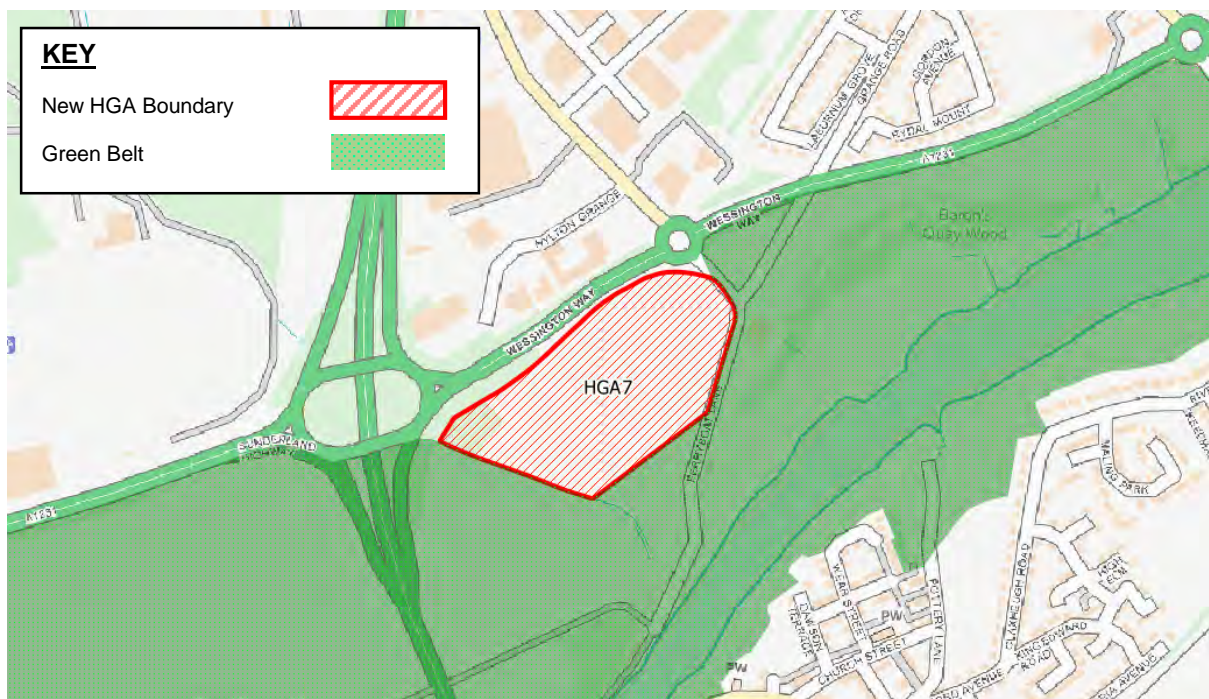


HGA 7: 'North Hylton'

PBA proposed amendment to HGA boundary (reduction):



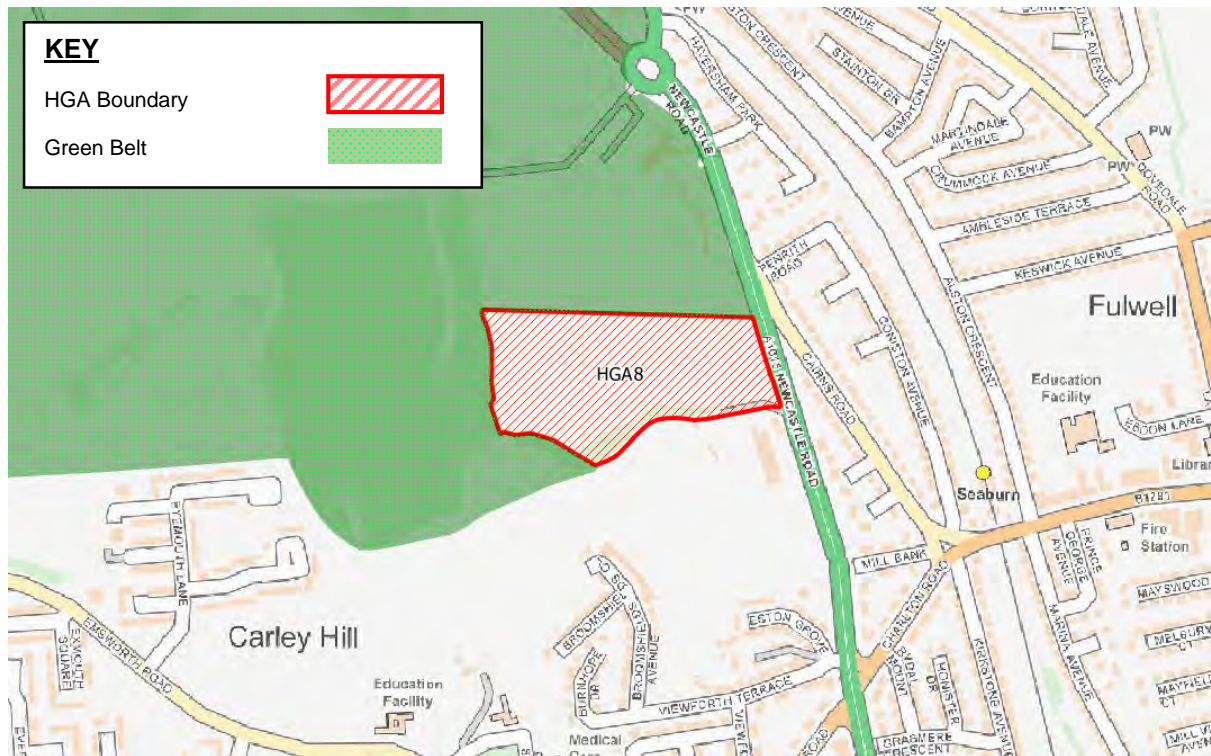
Updated HGA boundary:



HGA 8: 'Fulwell'

No proposed amendments

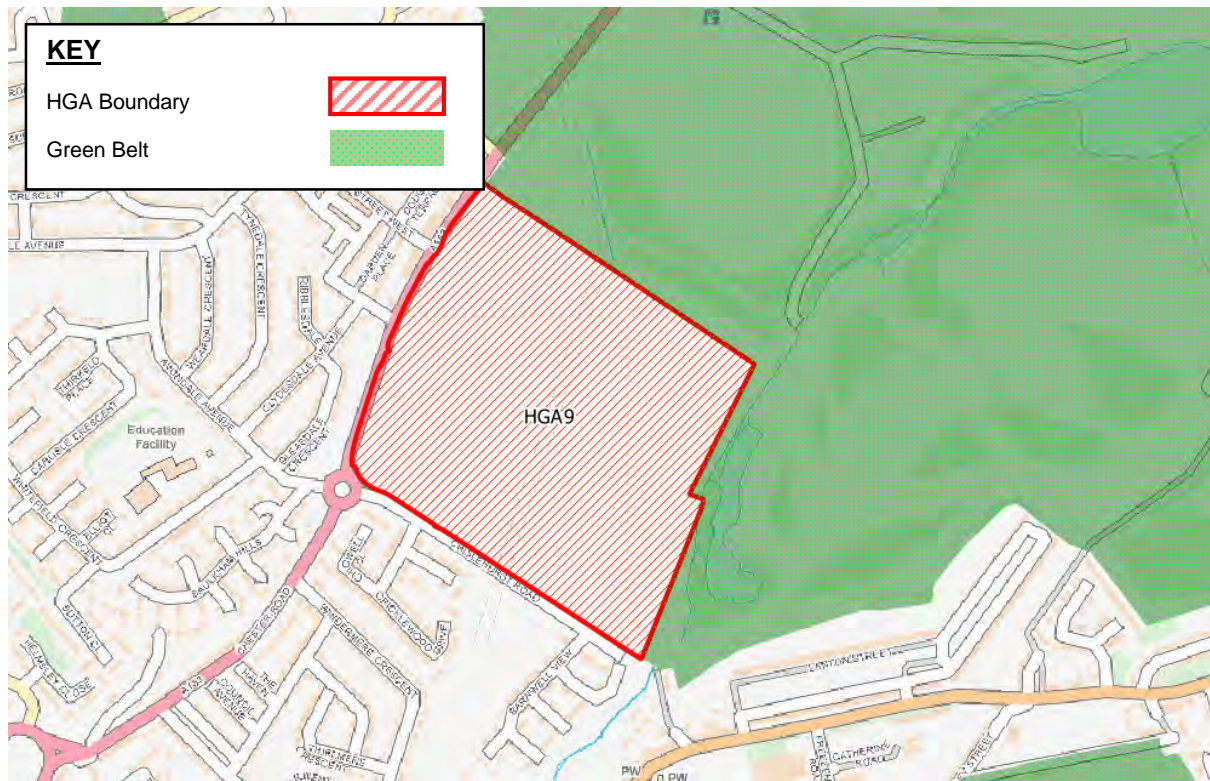
HGA boundary:



HGA 9: 'Penshaw'

No proposed amendments

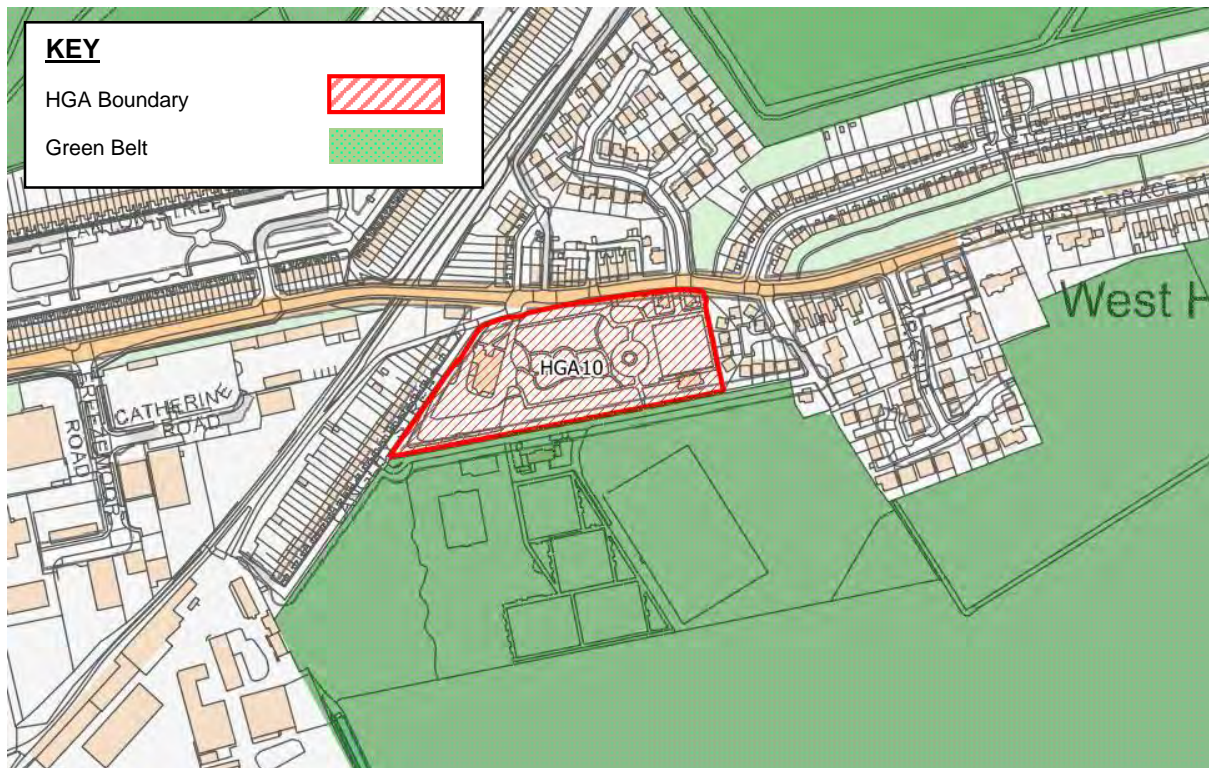
HGA boundary:



HGA 10: 'New Herrington'

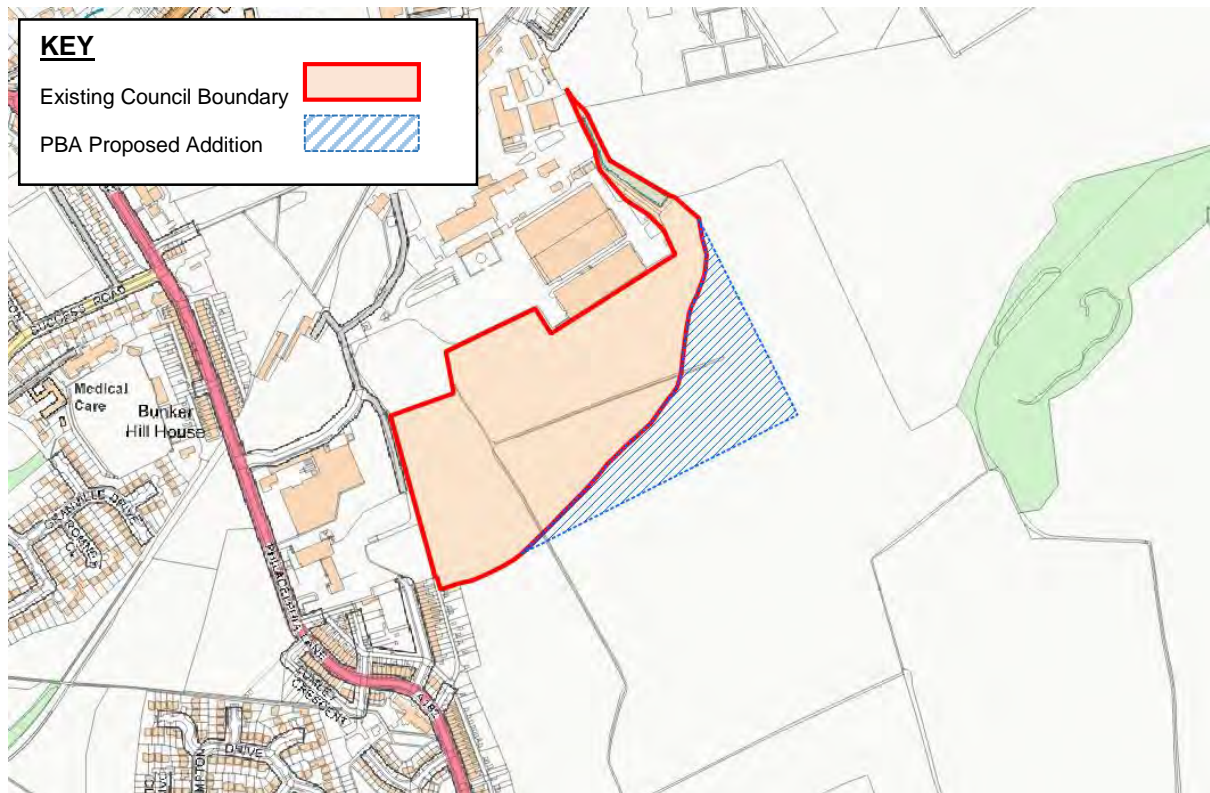
No proposed amendments

HGA boundary:

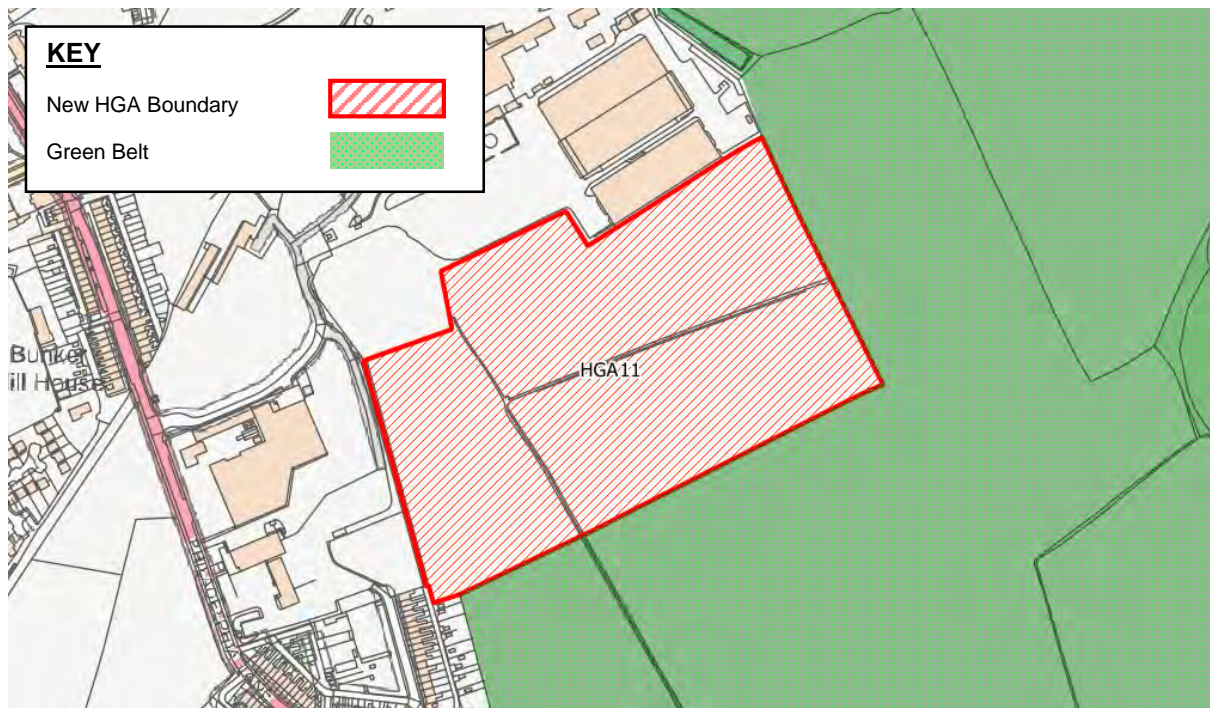


HGA 11: 'Philadelphia'

PBA proposed amendment to HGA boundary:



Updated HGA boundary:



APPENDIX D OTHER SUGGESTED GREEN BELT ADJUSTMENTS – PLANS

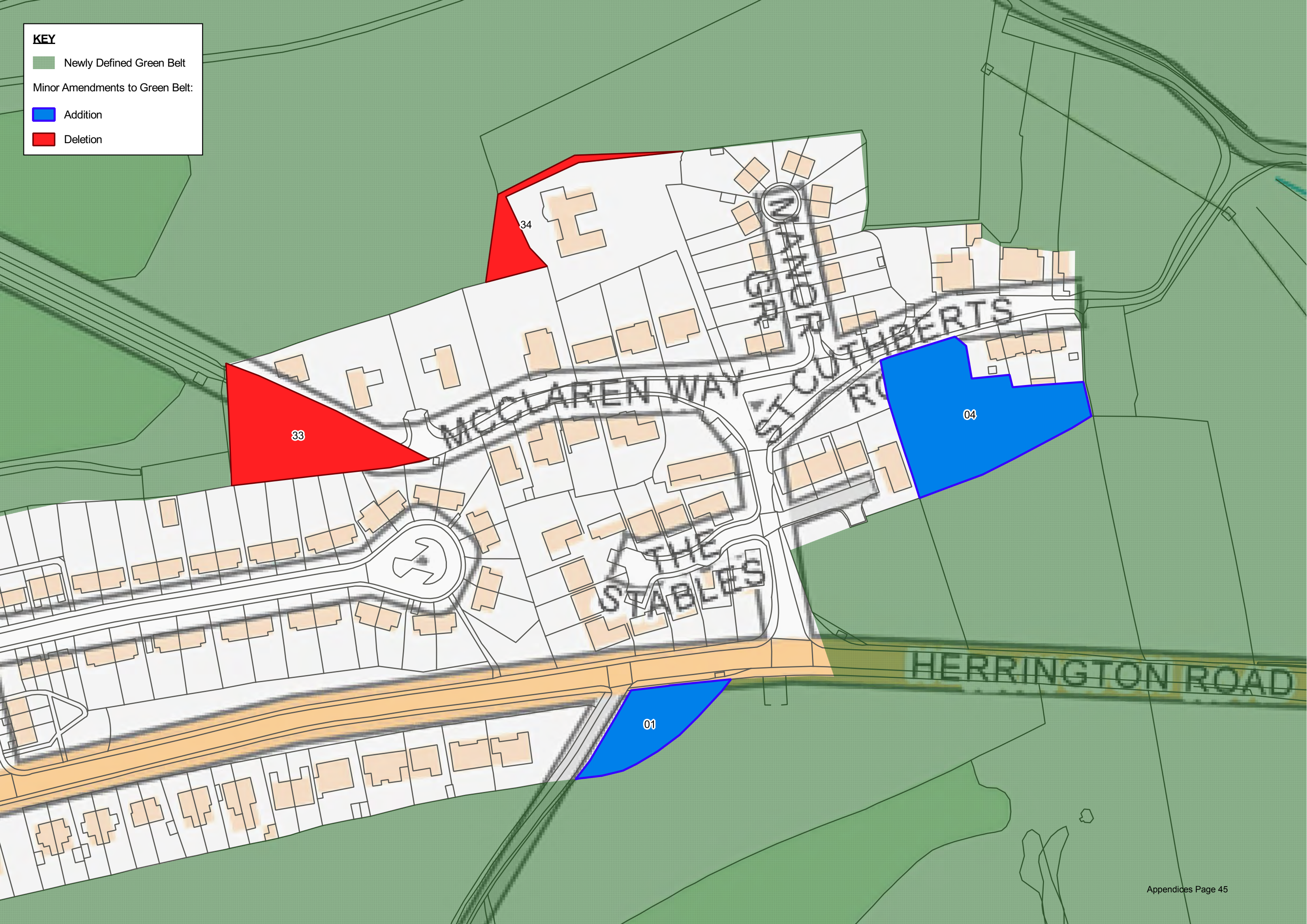
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Newly Defined Green Belt

Minor Amendments to Green Belt:

Addition

Deletion



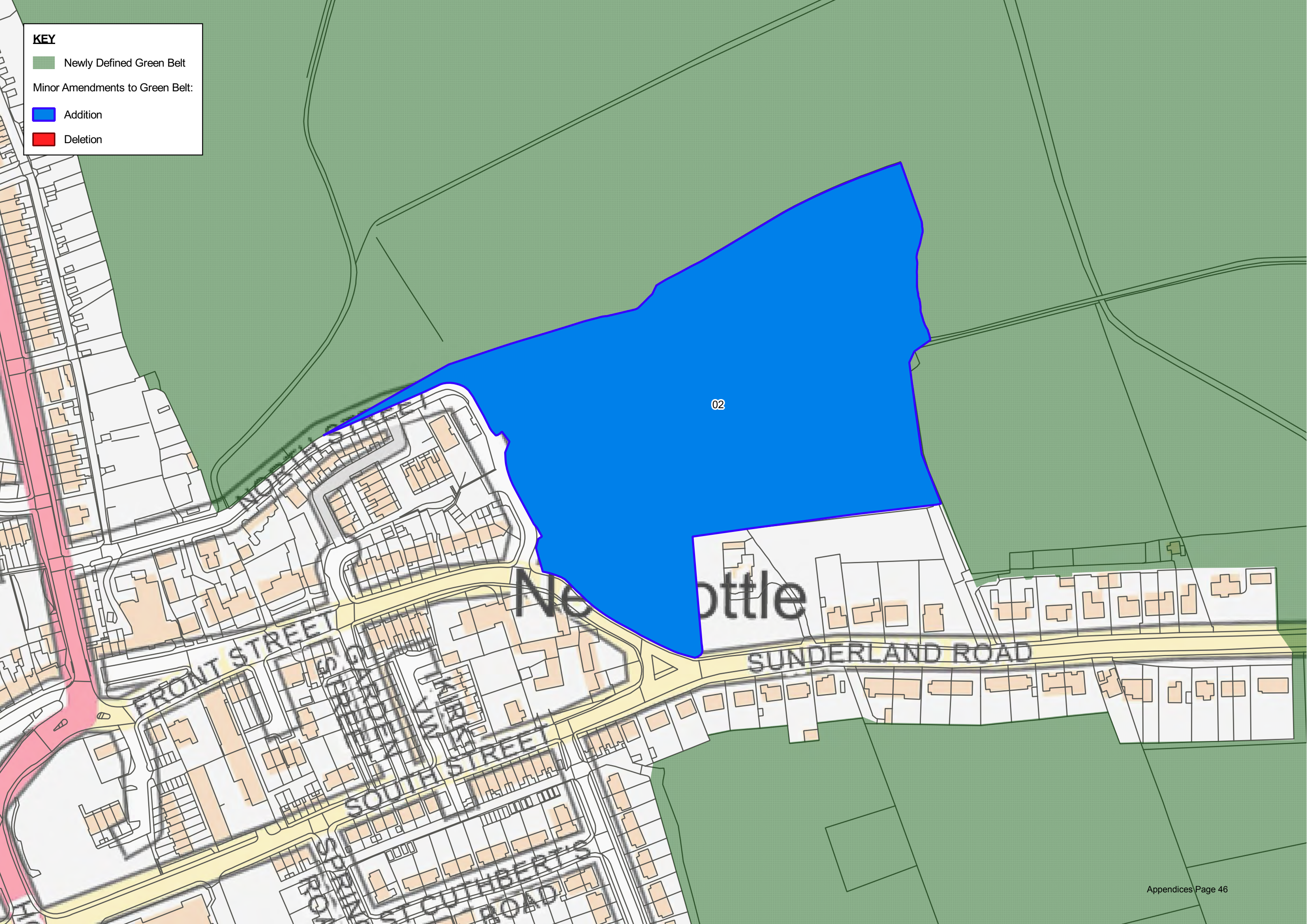
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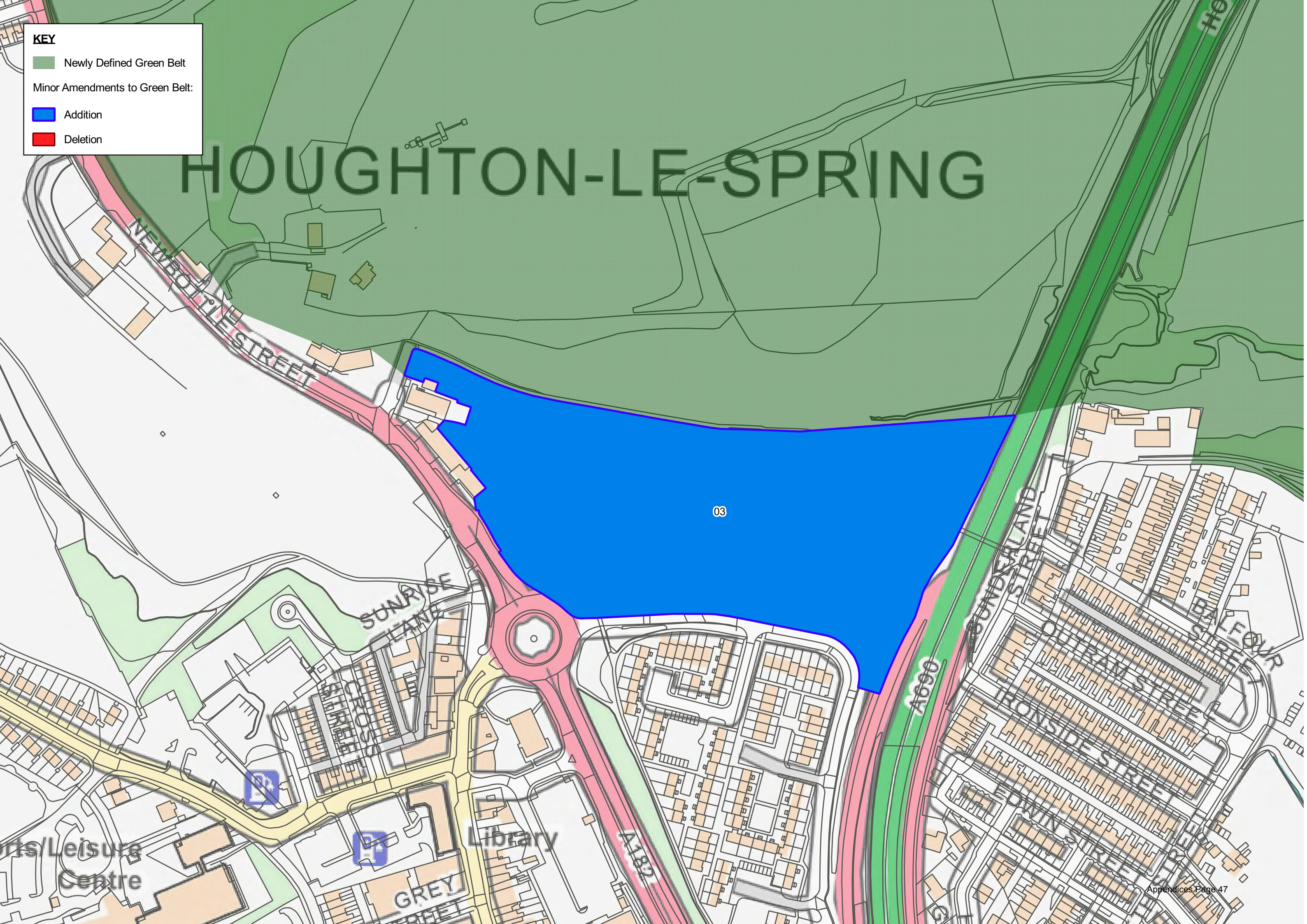
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KEY

Newly Defined Green Belt

Minor Amendments to Green Belt:

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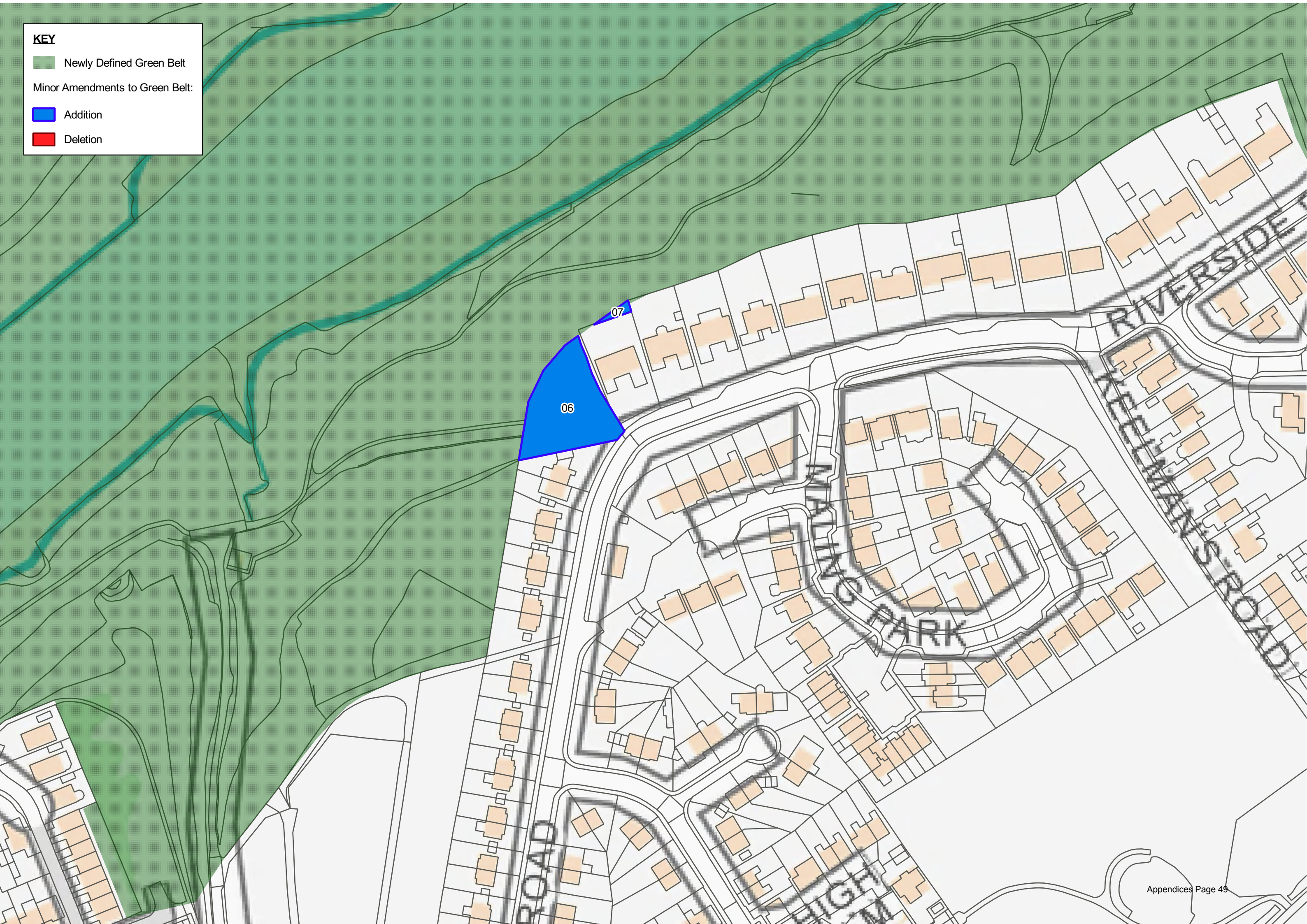
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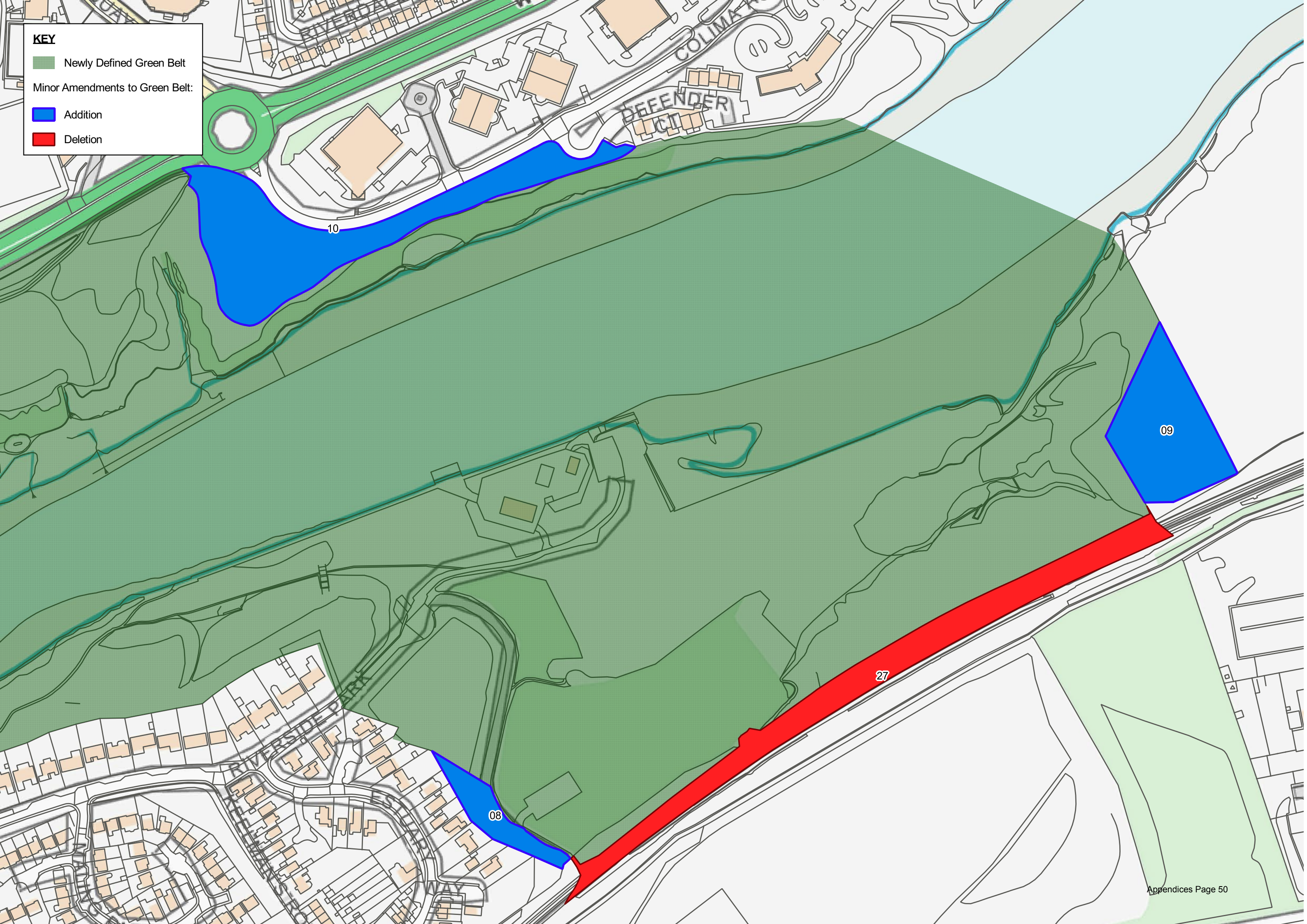
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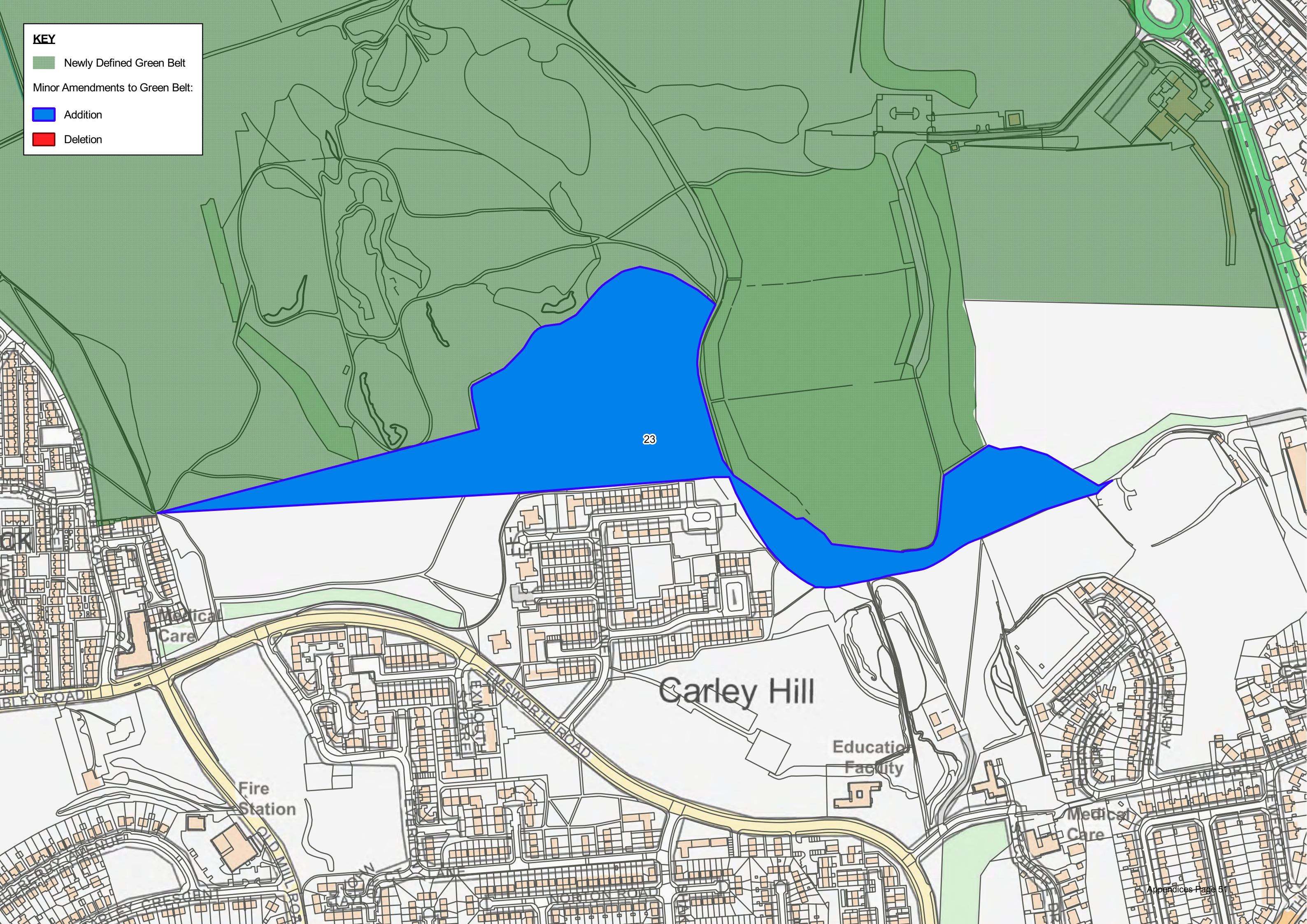
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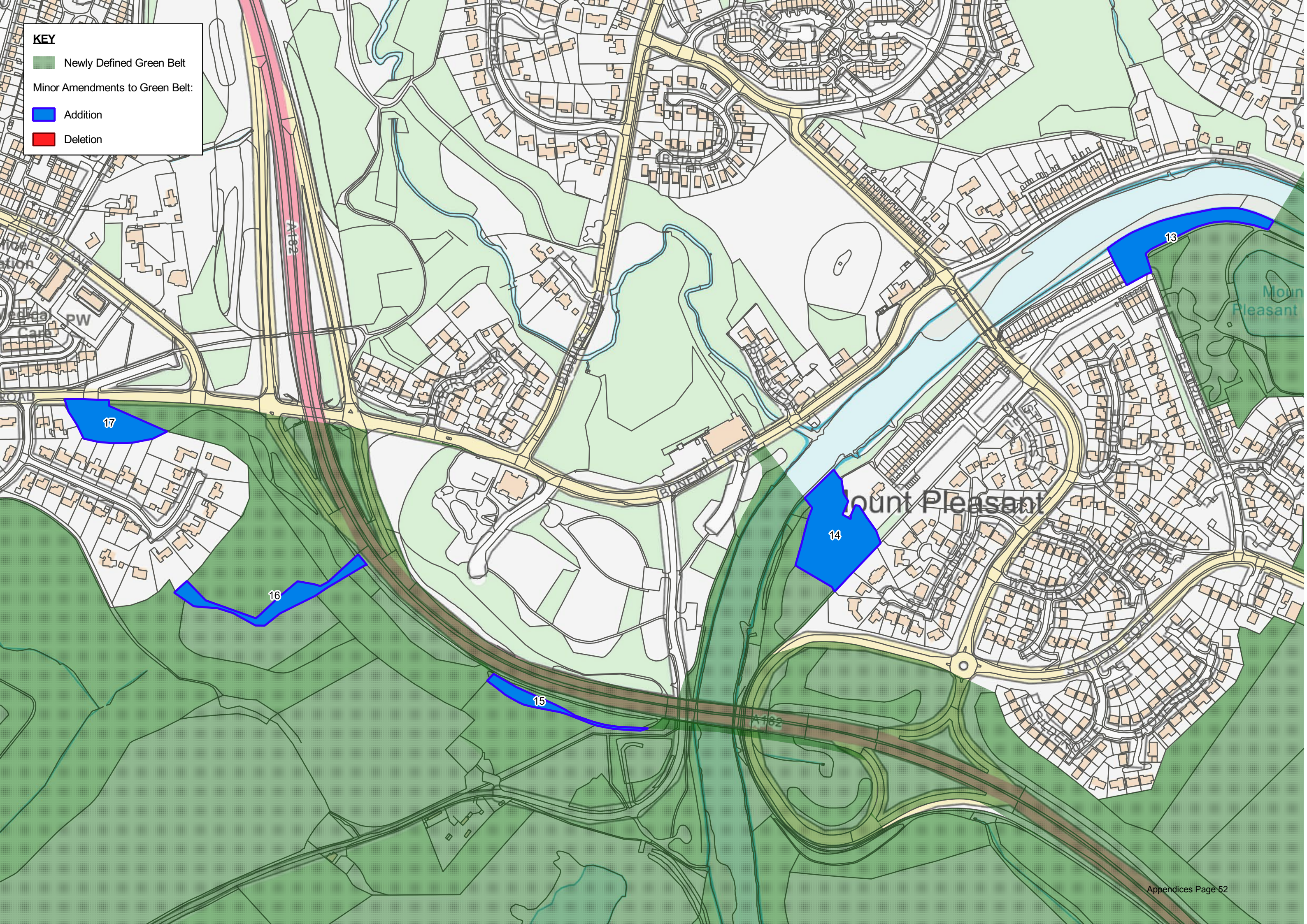
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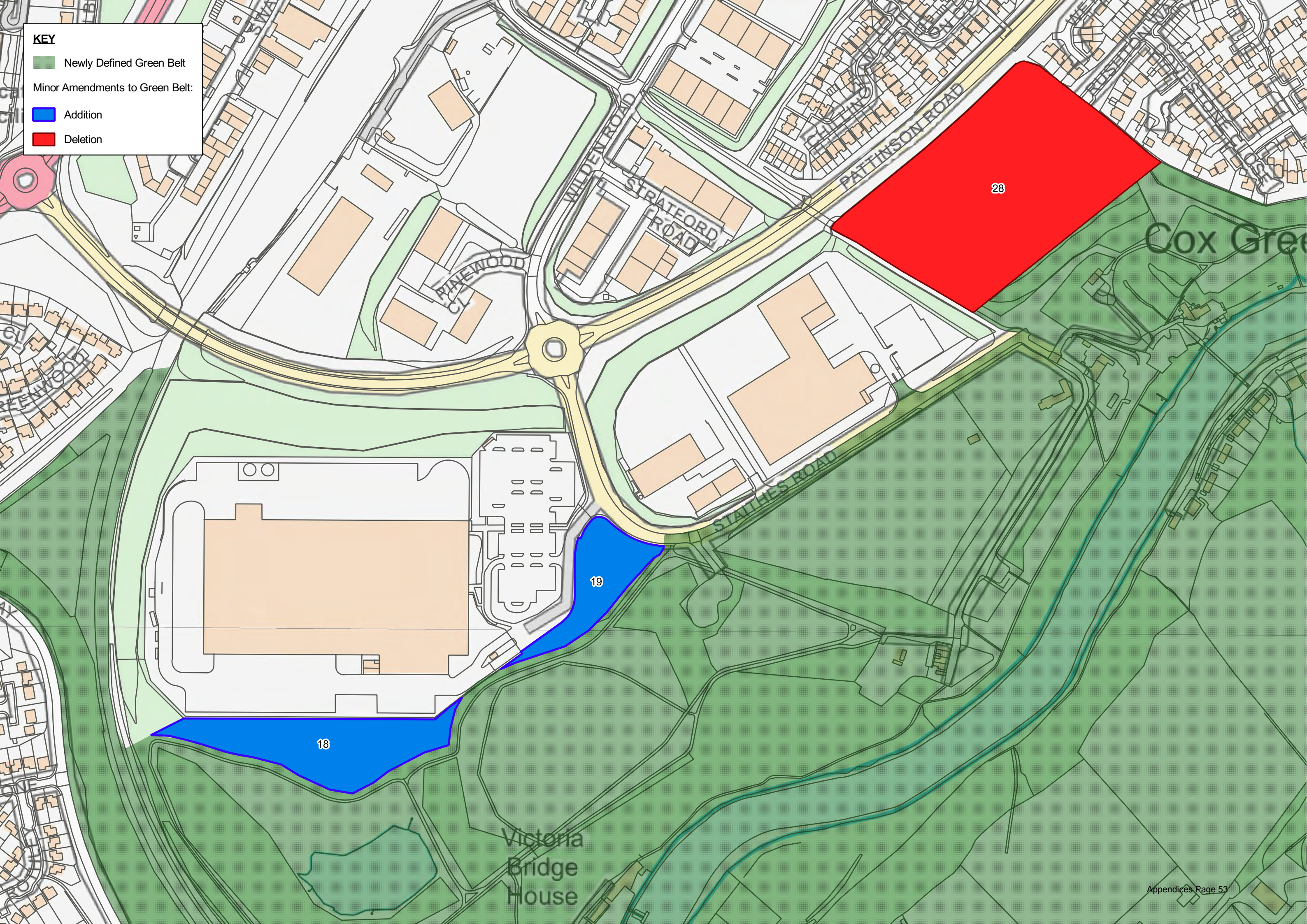
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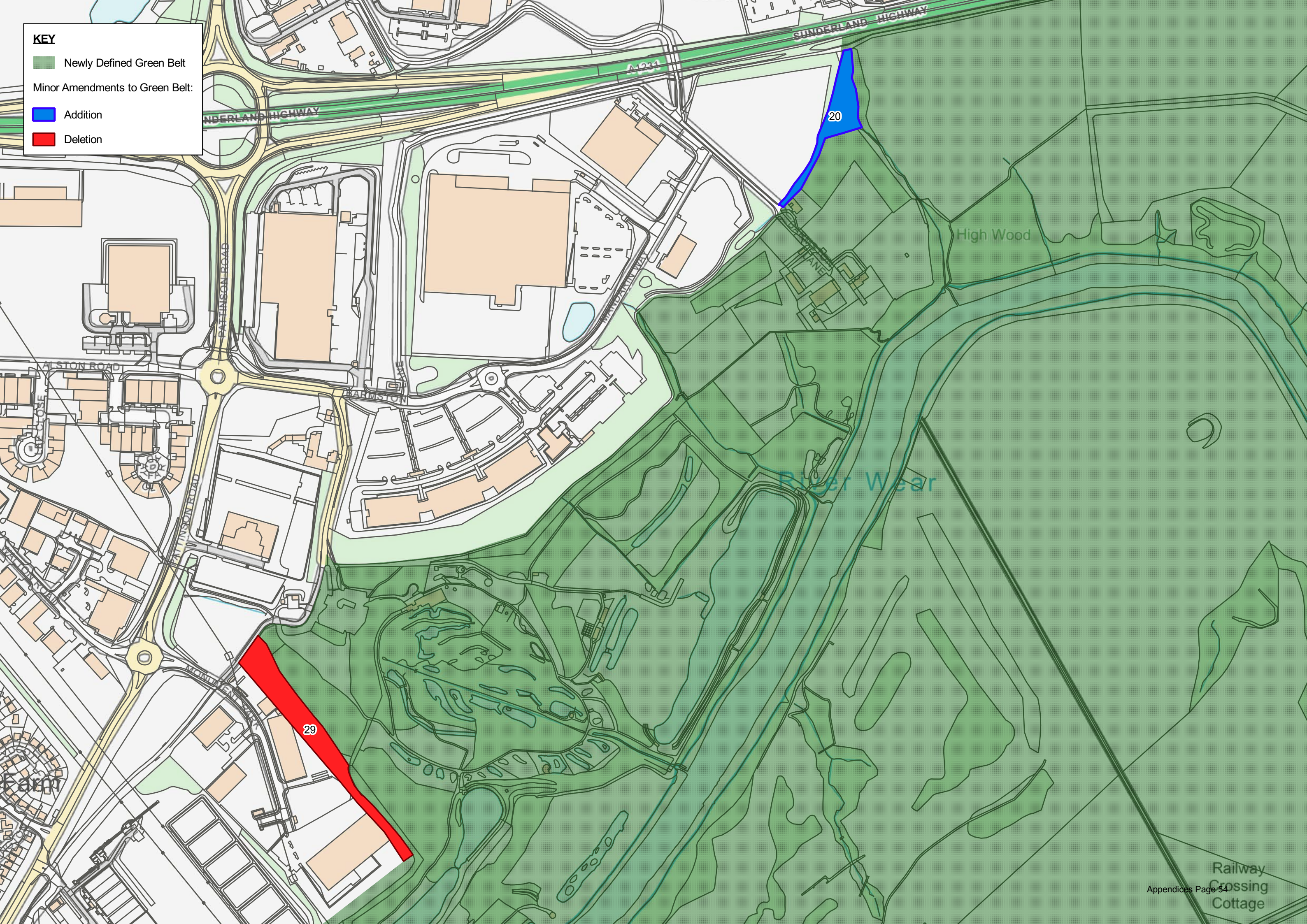
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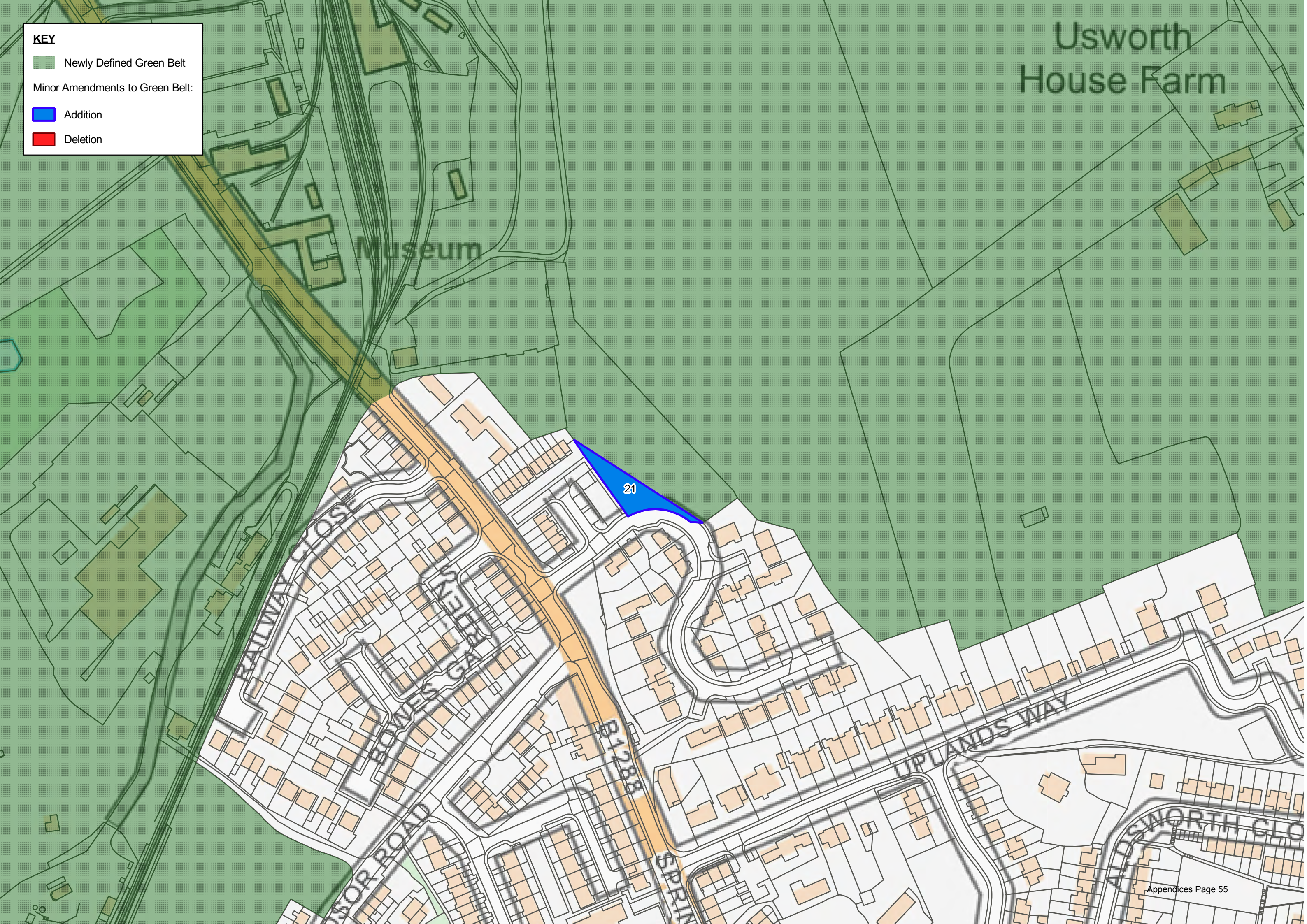
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Minor Amendments to Green Belt:

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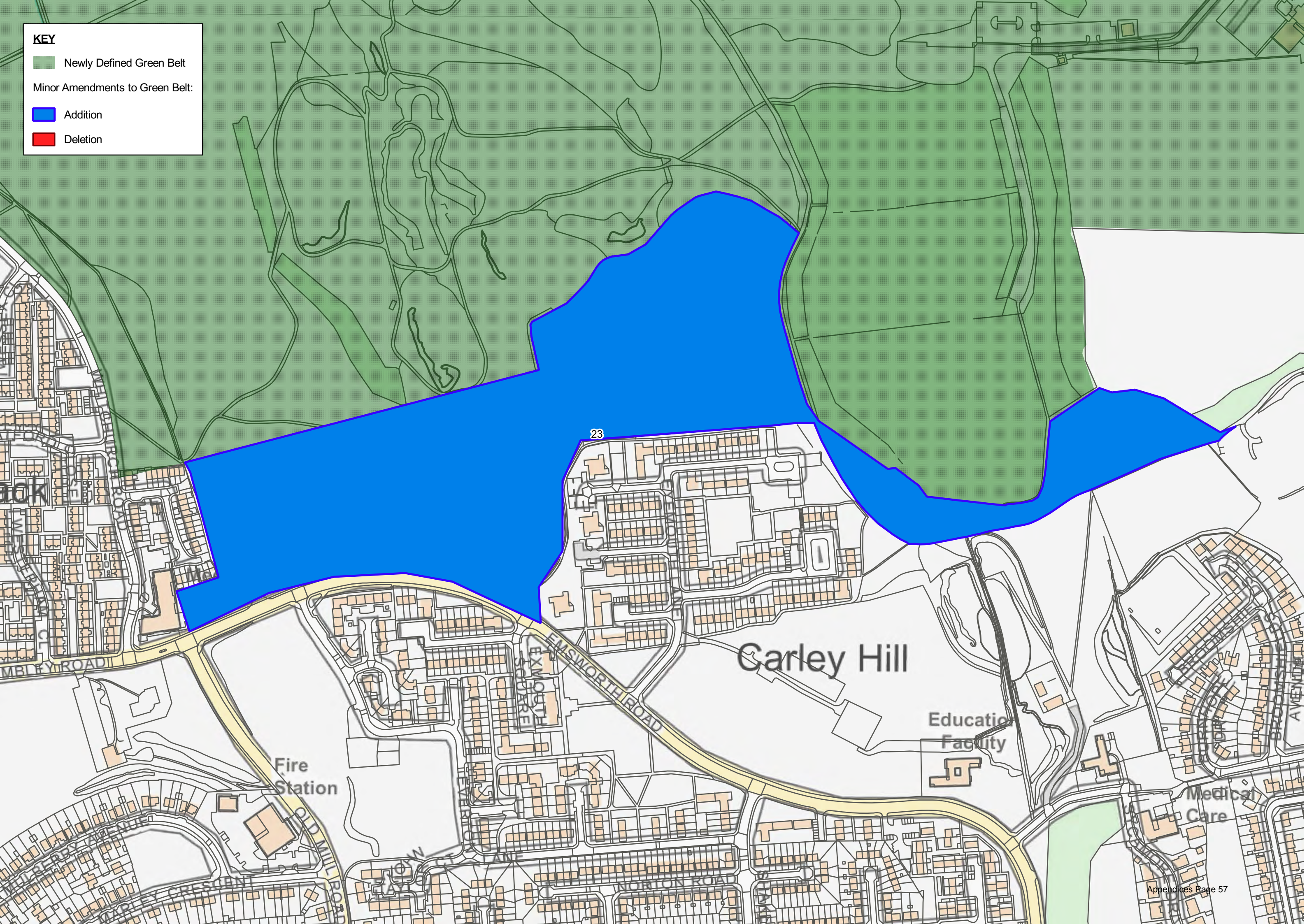
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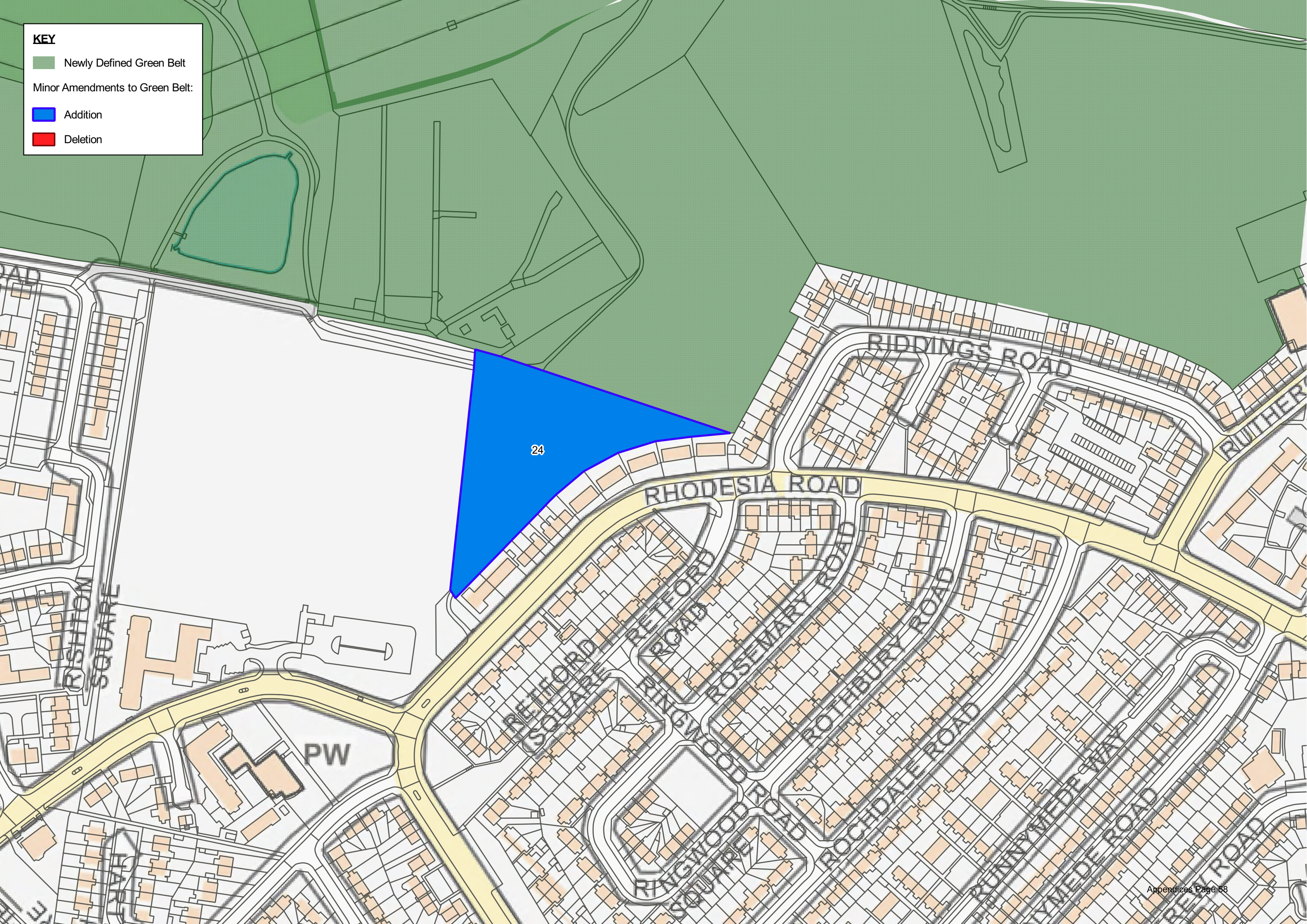
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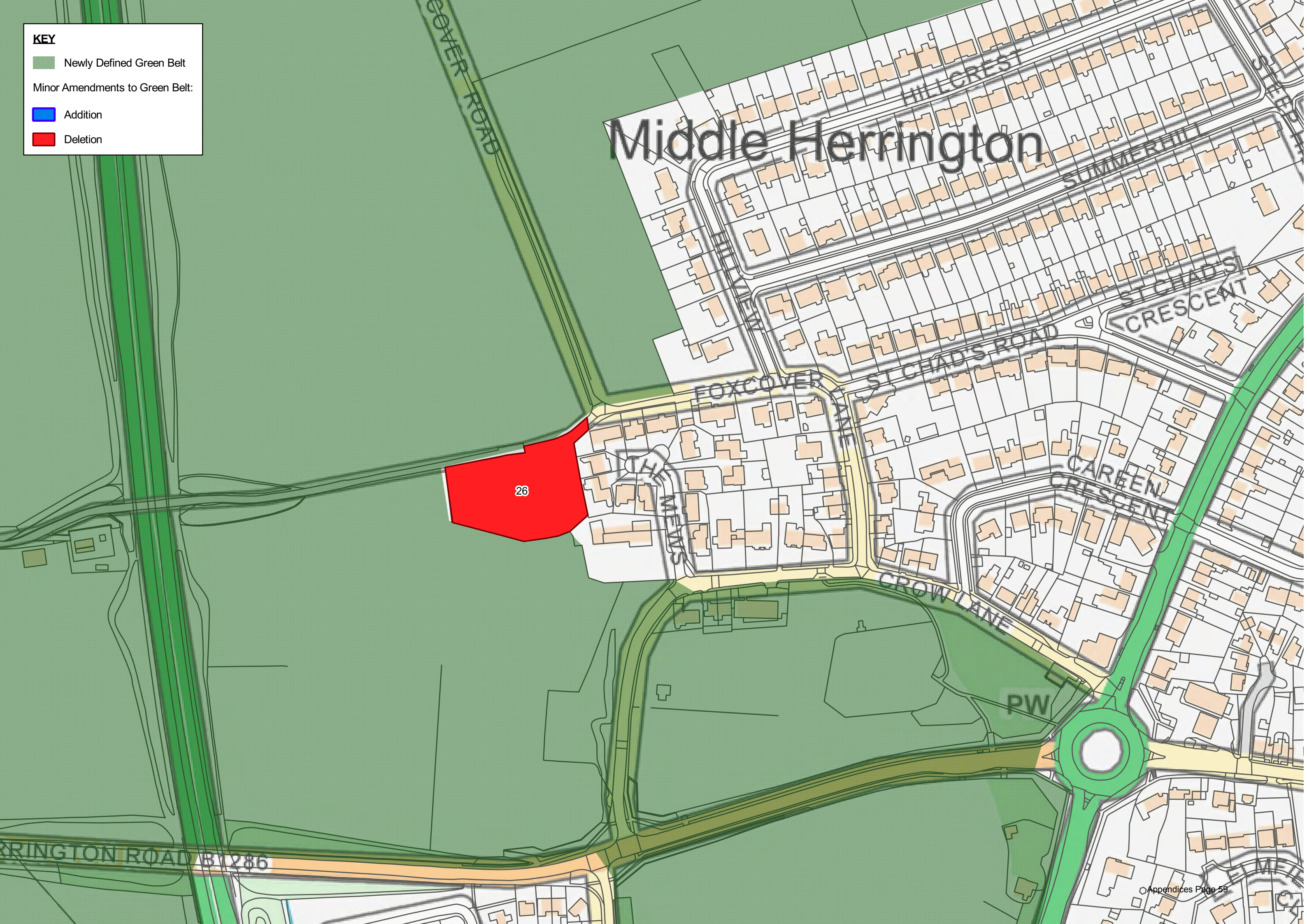
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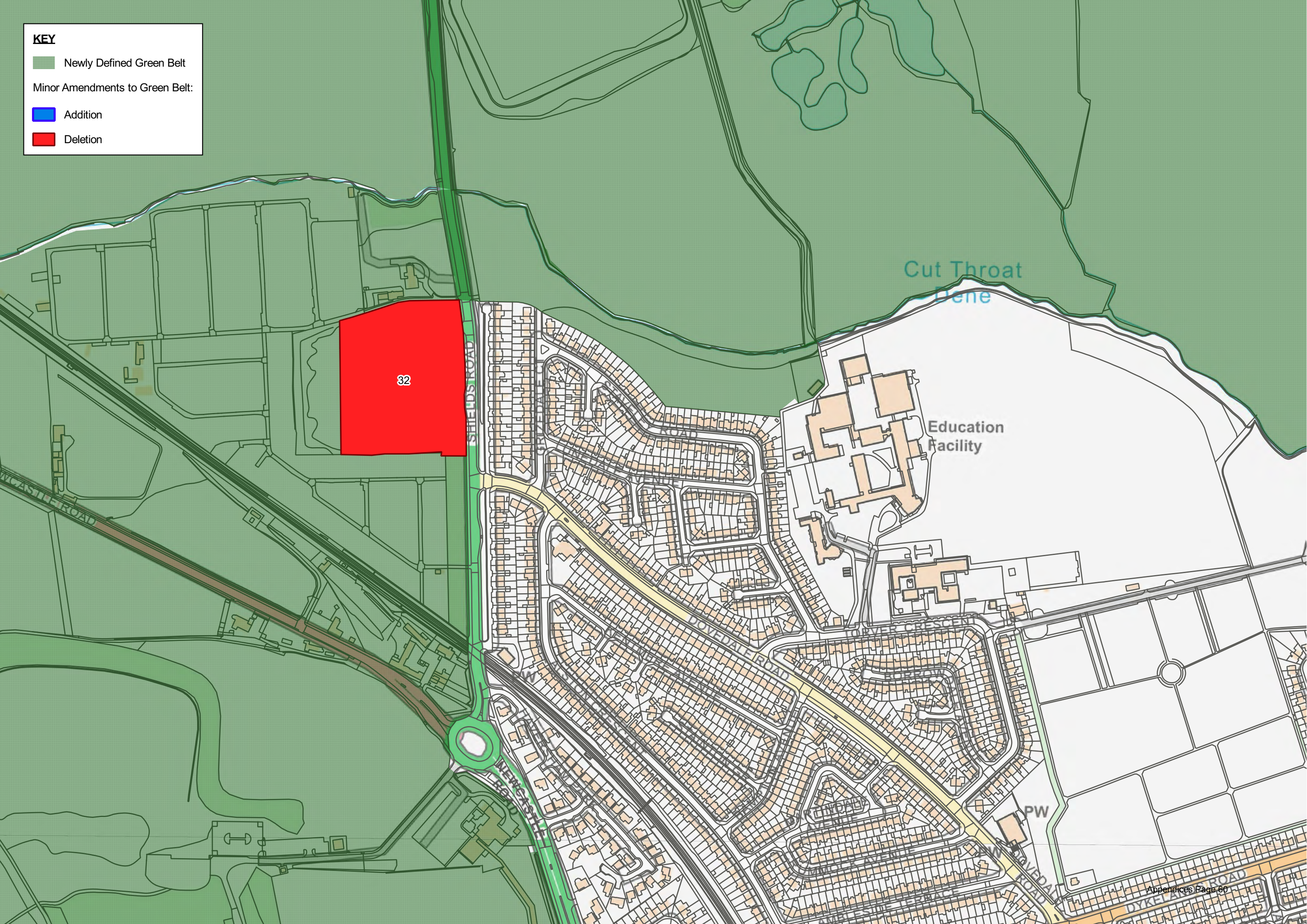
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Minor Amendments to Green Belt:

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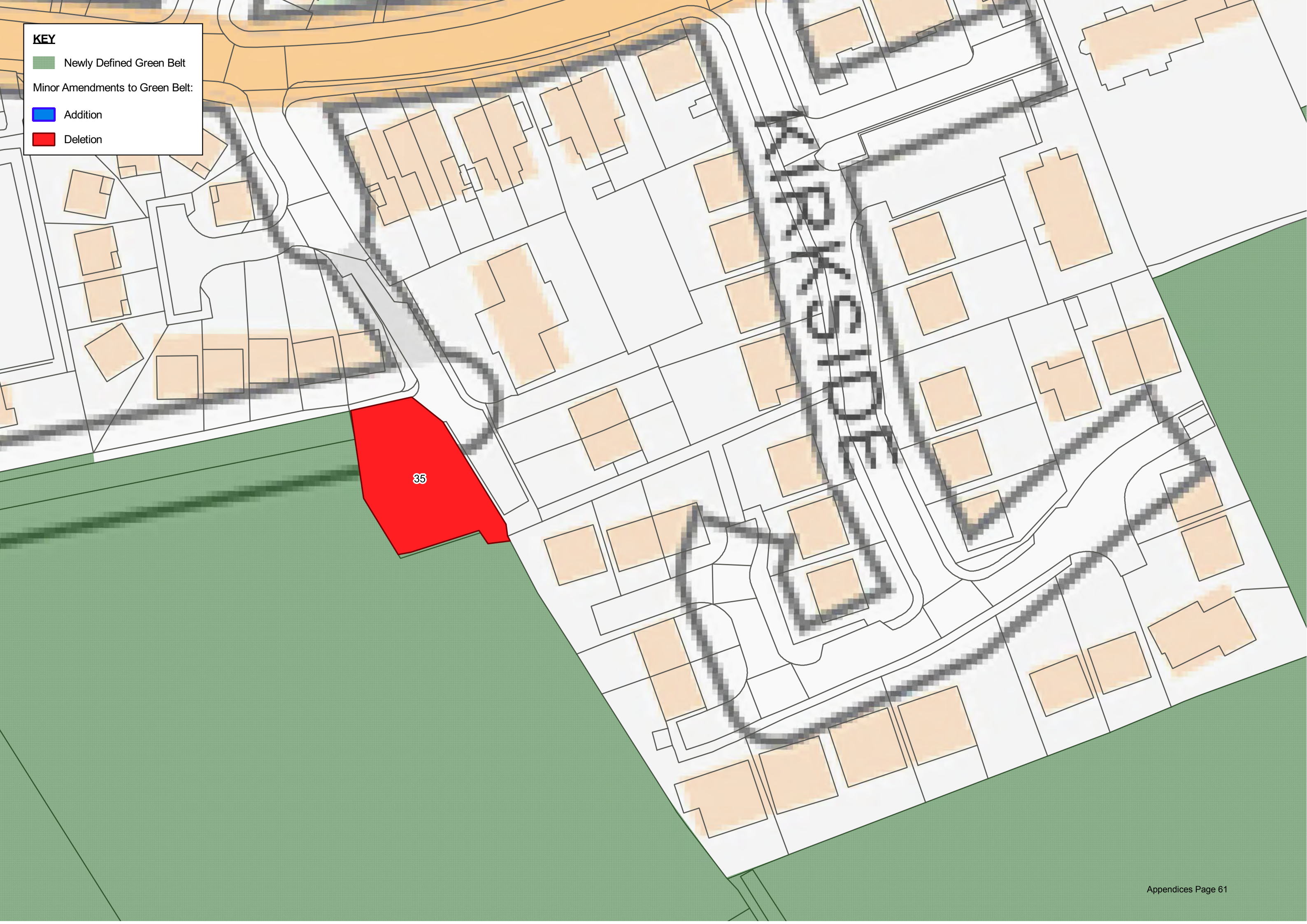
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Minor Amendments to Green Belt:

Addition

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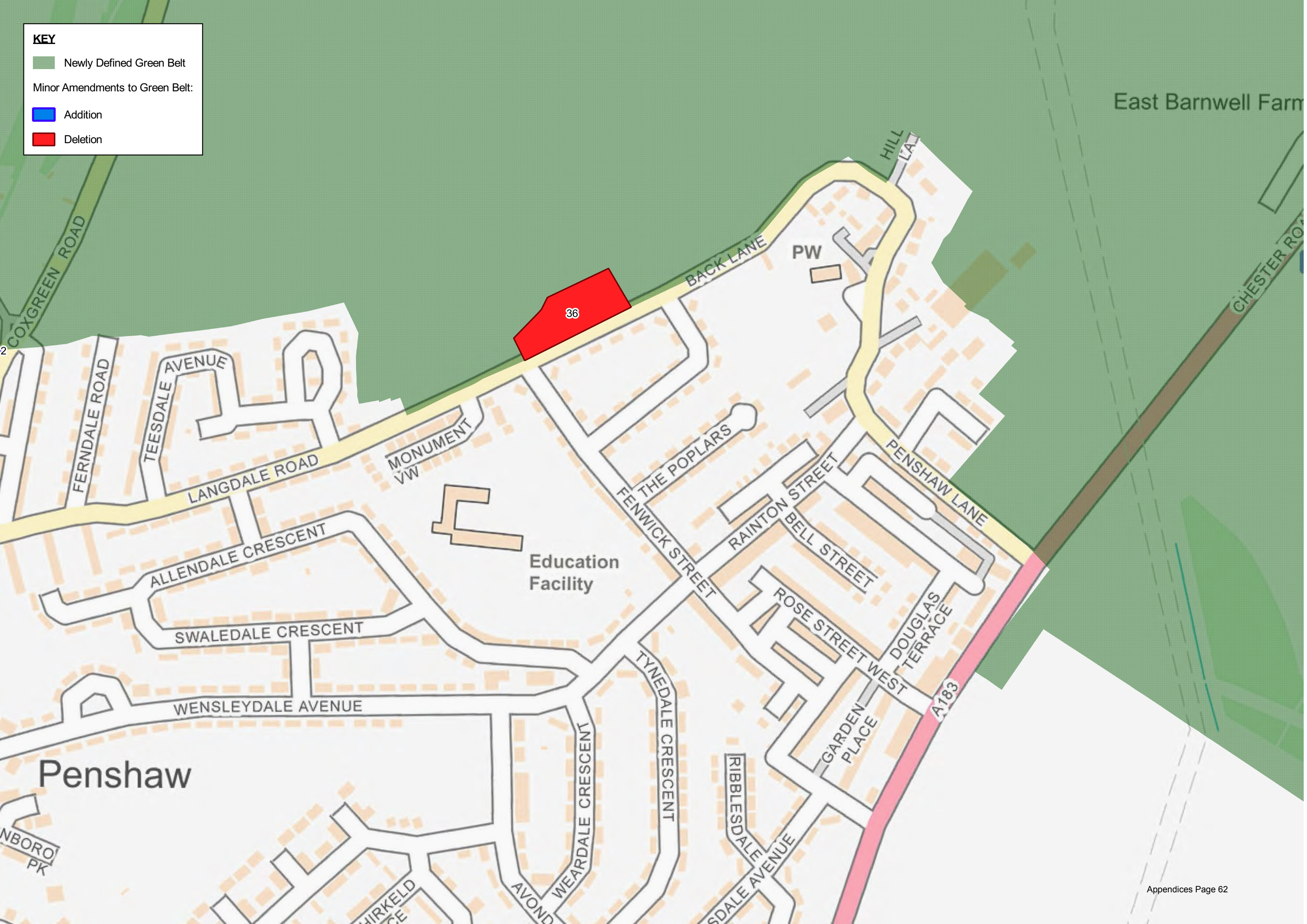
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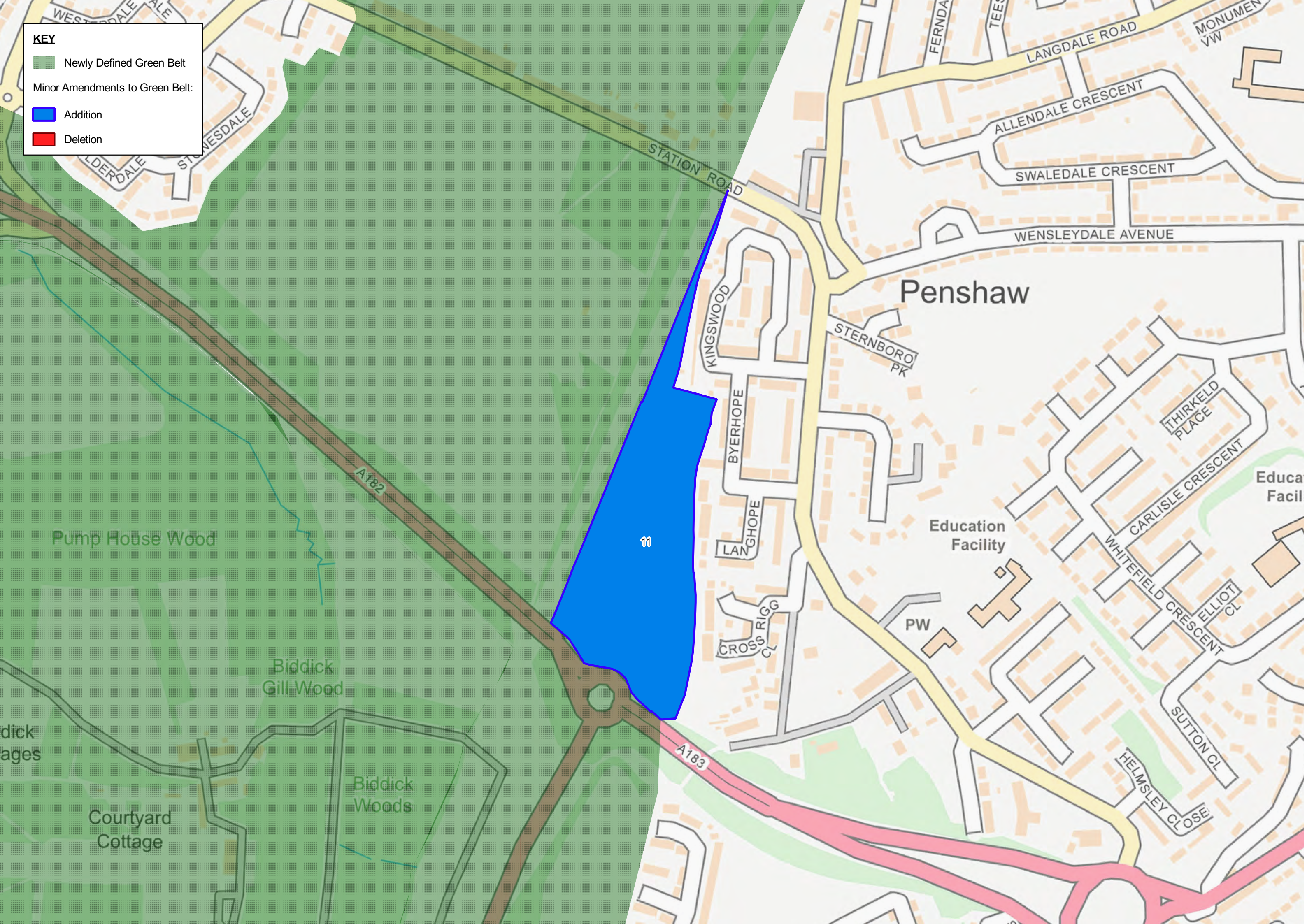
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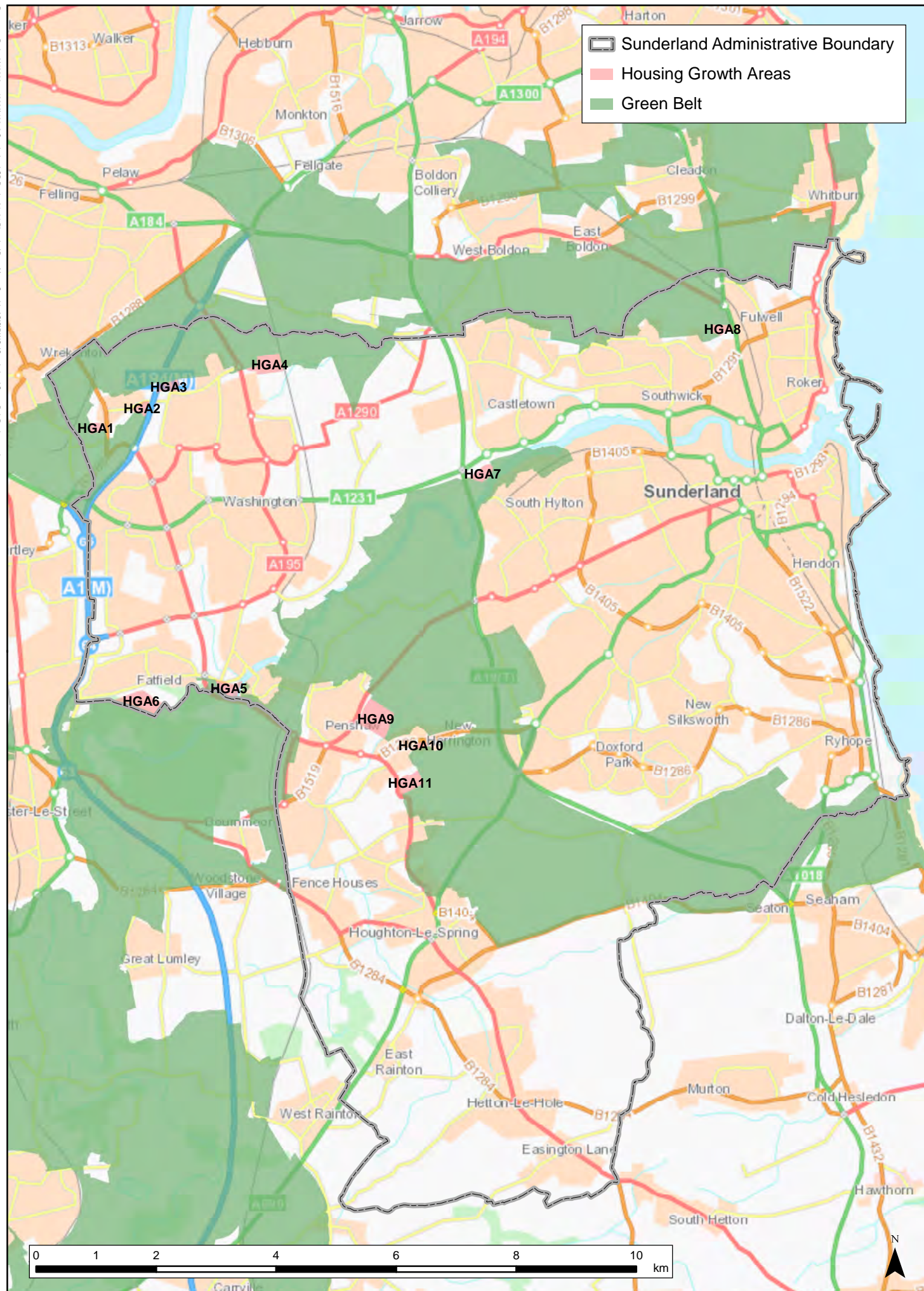
Minor Amendments to Green Belt:

Addition

Deletion



APPENDIX E PLAN SHOWING OUR RECOMMENDED NEW GREEN BOUNDARY FOR SUNDERLAND



Sunderland Administrative Boundary

Housing Growth Areas

Green Belt

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UPDATED FORMATTED
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Planning\Reps-Tech Notes\Draft report\REPORT 2\C June 18 UPDATED
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Subject: Review of the Sunderland Green Belt
Author:
Keywords:
Comments:
Creation Date: 14/06/2018 14:17:00
Change Number: 1
Last Saved On: 14/06/2018 14:19:00
Last Saved By:
Total Editing Time: 0 Minutes
Last Printed On:
As of Last Complete Printing
Number of Pages: 49
Number of Words: 11,317 (approx.)
Number of Characters: 64,507 (approx.)