

**SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN EXAMINATION**

Thank you for your response to my initial questions and comments. There are a few matters upon which I require further clarification. The paragraph numbers are as my initial questions and comments and the Council's response. In addition, following my familiarisation visit last week, I have some questions and comments in relation to the proposed Housing Growth Areas (HGAs). Where a point could potentially be addressed by a Main Modification (**MM**) or Additional Modification (**AM**) to the Plan I will make this clear by including MM or AM in the text.

**Further Clarification**

15 - In terms of the Duty to Cooperate I note the reference to discussions with neighbouring authorities and the contents of SD.11, including the letter from Durham County Council dated 15 May 2018. It is stated that at this stage Durham is unable to accommodate any of Sunderland's housing growth. That said Durham appears to be less constrained by Green Belt than other neighbours in that only about 4% of the County is so designated. Although much of Durham's Green Belt is immediately to the west and south-west of Sunderland, there are significant areas of non-Green Belt land within Durham close to Sunderland. Is the Council satisfied that it has robustly explored opportunities with Durham to meeting some of Sunderland's housing needs?

17 –The inclusion of tables within the supporting text to Policy SP1 showing the distribution of housing and employment growth would be acceptable. The distribution should also be justified within the text. Having regard to my previous comments and the contents of Policy SP1, the policy should be entitled 'Development Strategy' rather than 'Spatial Strategy' (**MM**).

41 – The proposed transitional period of one year for the introduction of the nationally described space standards appears appropriate.

56 –I still maintain that the terms of Policy WWE8 are specific to the development of waste facilities themselves rather than for development close to such sites. This is reflected in criteria 1-4 within the policy. Therefore, my previous advice that the policy should be expanded so that it directly addresses the issue set out in paragraph 11.42 remains so that the policy is effective (**MM**).

58 – I accept that the Mineral Safeguarding Areas and Safeguarded Facilities do not need to be included on the printed version of the Policies Map. However, for clarity there should be reference to Appendix 3 (as amended by M84) within the explanation to Policy M1 (**AM**).

63 – I note what the Council say about Policy NE3 but on reflection criterion 1 should be deleted as it is effectively dealt with elsewhere within the policy, particularly under 2 ii (**MM**).

64 – My original question was framed in the context of paragraph 109 of the National Planning Policy Framework and 'protecting and enhancing valued landscapes'. If the Council is satisfied that the areas shown for 'Landscape Protection' on Figure 3.2 are 'valued landscapes' in the context of paragraph 109 and this can be justified, then the Plan should make this clear (**MM**). Conservation areas, open spaces and nature reserves are protected by other policies of the Plan.

72 – I note that the requirement within Policy NE4 is for all types of greenspace. However, the 0.9 ha of greenspace per 1000 bedspaces compares unfavourably with nationally recognised guidelines such as the National Playing Fields Association ‘6 acre standard’. Is the greenspace requirement for major residential development justified?

### **Housing Growth Areas**

HGA1 – South West Springwell – Policy HGA1 (vii) requires pedestrian/cycleway connections to the existing public right of way to the north. Are these achievable taking into account the area of intervening land to the north west of the site? The contextual analysis of the site within SD.35 shows bus stops on Mount Road. Is there information in the evidence base about the bus services using this route? If not, can this be provided? Similar information would also assist in considering whether the other HGAs are in locations which are or can be made sustainable.

HGA2 – East Springwell – I note the site’s relationship to the village in comparison with the land to the south-west which is proposed to be safeguarded under Policy SS3. I could not identify within the Green Belt Assessments whether there was any significant distinction between the two parcels of land in terms of the effect on Green Belt purposes. Is there a justification within the evidence base for the different approach to the two parcels?

HGA3 – North of High Unsworth – The nearest bus stops are shown as being within Springwell. Does a bus route run along Stone Cellar Lane?

HGA10 – New Herrington – Would it be viable to require the creation of a new club building alongside a development of around 20 dwellings?

### **Response**

I look forward to a response on these matters as soon as possible to allow me to finalise the Matters, Issues and Questions for the examination. In this respect a response by 2 April 2019 would be very helpful.

*Mark Dakeyne*

INSPECTOR

25 March 2019

Inspector: Mark Dakeyne BA (Hons) MRTPI