

STATEMENT OF RICHARD COWEN TO THE EXAMINATION IN PUBLIC
INTO THE
SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN
RELATING TO MATTER 7 part 2

1. I make this statement on behalf of the CPRE Durham.
2. We have made detailed representations in response to Matters 2 and 3 relating to “exceptional circumstances” for deleting areas of the Green Belt. We have argued that the proposed Objectively Assessed Need (OAN) for housing is excessive and that there is a good supply of brownfield land available. We believe that those representations are relevant to this Matter and, if accepted, mean that no deletions from the Green Belt are required. We represent that they should be taken into account here.
3. However, we make the following comments to the questions asked in relation to this matter insofar as we have not addressed them in our responses to the above Matters

1. Strategic Policies

1.2 Are Policies SP4 and SS4 justified and effective?

In so far as these policies relate to deletions from the Green Belt, we believe we have addressed this in our responses to Matters 2 and 3

2. Identification of Sites

2.1 Do the Green Belt assessments support the HGAs in North Sunderland and demonstrate exceptional circumstances for the removal of land from the Green Belt?

As we have outlined in our responses to Matters 2 and 3, we do not consider “exceptional circumstances” have been made out for any deletions from the Green Belt

2.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

We believe not

2.3 Are the configuration and scale of the HGAs justified taking into account development needs and the Green Belt assessments?

We believe not

3. HGA7 – North Hylton

3.1 Does the updated HRA indicate that development of the site will have no significant effects on the integrity of the Coastal Sites of European importance?

CPRE does not have the expertise to comment on the Habitats Regulations Assessment

3.2 Is the Council satisfied that the landscape, heritage, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

CPRE is very concerned about the landscape impacts of development of this site. While the site, in view of its location on the east side of the A19 and adjacent to the A1231 may be sustainable from a transport and access point of view, we believe this is an important part of the green belt which separates the hamlet of North Hylton from the rest of the City. We note from the Stage 1 Green Belt Assessment that this does not appear to have featured as a reason for this part of the green belt (see page 73 of the Assessment which mentions Springwell and Newbottle but not North Hylton). In view of the isolated nature of the setting around North Hylton and its tiny size, we represent that this is still a relevant issue here.

The maps on pages 72 and 74 of the Assessment show that, if this part of the Green Belt is deleted, what is left is almost meaningless and may be very difficult to defend.

We note the conclusion on the Selection Report relating to this site (reference 416A). There may be no immediate Category 1 constraints as described in the Assessment but we represent that this is an important part of the Green Belt and should not be deleted.

3.3 Are all the policy requirements within HGA7 necessary and clear to the decision maker?

We make no comment on this

3.4 Is the site deliverable?

Given its location and the greenfield nature of the site, we assume this is the case if the site is allocated, given the latest definition in the NPPF of “deliverable”.

4. HGA8 - Fulwell

4.1 Does the updated HRA indicate that development of the site will have no significant effects on the integrity of the Coastal Sites of European importance?

Again, we do not have the expertise to comment on this

4.2 Is the allocation appropriate in view of the need for a Playing Field Assessment?

We represent that this is likely to affect its deliverability

4.3 Is the Council satisfied that heritage, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

CPRE is concerned that, even if this site were not Green Belt, it would be an unacceptable intrusion into the countryside. Although the eastern side of the site is adjacent to the built area, it would be a significant intrusion and could lead to pressure to develop the adjacent golf driving range.

While we note that “landscape” does not form part of this question, we are concerned that this site does form part of an important break between the City and South Tyneside even though this part of the green belt does “intrude” into Sunderland. We also note the “playing field” issue and represent that it is not suitable for deletion

4.4 Is the site deliverable?

As with North Hylton, we assume that it is if allocated but the playing field issue would need to be clarified

5. Infrastructure

5.1 Will the infrastructure to support the scale of development proposed in North Sunderland be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

CPRE is unable to comment

6. Delivery

6.1 Are the assumptions about the rate of delivery of sites in North Sunderland realistic (anticipated delivery is shown in Appendices A, B, F and L of the SHLAA)?

CPRE is unable to comment

Richard Cowen

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5 May 2019