

Matter 7

STATEMENT OF RICHARD COWEN TO THE EXAMINATION IN PUBLIC
INTO THE
SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN
RELATING TO MATTER 7 part 3

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 SP3 and SS2 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 and areas of Safeguarded Land in Washington 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 and areas of Safeguarded Land justified taking into account development needs and the Green Belt assessments?

We believe not

2.4 Is there any justification for the allocation of the safeguarded sites at this stage?

If our representations relating to Matters 2 and 3 are accepted as sound, then we believe there is no such justification

3. HGA1 – South West Springwell

3.1 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? The Council has clarified that the site promoter owns neighbouring land to facilitate access routes.

We note that Springwell is specifically identified as a place the Green Belt is designed to protect. We note that, in the assessment of this field against the purposes of the Green Belt, it has 2 categories as “D”, the second worst category. However, we also note that, in relation to preserving the setting and special character of Springwell, it is category “B”. Given the nature of Springwell and the fact that this site adjoins the village, we are surprised at this.

In addition, we note that Policy HGA1 states that the open aspect towards the Bowes railway needs to be retained. Given that this is a Scheduled Ancient Monument, we represent that the duty under Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, which requires decision makers to seek to preserve the setting of heritage assets, we represent that this is a tougher test than just retaining an open aspect.

In view of this, we represent that there is a significant risk that heritage and landscape constraints are at risk here – indeed, the railway may be, contrary to what is said in the Stage 2 Assessment for this site, a Category 1 Constraint.

We represent that the access routes, should this site be in fact allocated, need to be clarified at this stage at least in principle. It appears these may also affect other parts of the Green Belt.

3.2 Are all the policy requirements within HGA1 necessary and clear to the decision maker?

No comment

3.3 Is the site deliverable?

In view of our comments above, we question whether it is deliverable without causing harm to a heritage asset.

4. HGA2 – East Springwell

4.1 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?

Our comments above relating to the purpose of the Green Belt around Springwell are equally relevant to this site.

We also note the concerns relating to wildlife corridor. It appears to us that, if this site is allocated, it will come very close to the A194(M) so a wildlife corridor will virtually disappear. Further, the only thing separating Springwell from Donwell will be the motorway.

We cannot see how this is a legitimate way to deal with the Green Belt and that it will significantly detract from the purpose of the Green Belt to prevent coalescence.

4.2 Are all the policy requirements within HGA2 necessary and clear to the decision maker?

No comment

4.3 Is the site deliverable?

Given the proximity of the site to the motorway, we represent that noise issues for residents, if the site is allocated may be difficult to address satisfactorily.

5. HGA3 – North of High Usworth

5.1 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?

We are concerned that this site is an intrusion into the countryside that will leave a narrow band of Green Belt between it and existing housing. Although this is a golf course, we represent that there will be considerable pressure to develop this site as well.

We also note that it will affect a local wildlife corridor. It is not clear how this will be mitigated.

We also note that this site is virtually on the opposite side of the motorway from the deletion proposed in East Springwell. If Unsworth, East Springwell and South West Springwell were all allocated, it would virtually make a line of new housing in the current Green Belt which would be a significant intrusion into it.

5.2 Are all the policy requirements within HGA3 necessary and clear to the decision maker?

No comment

5.3 Is the site deliverable?

We again note the proximity of this site to the motorway. While a 50 metre buffer is proposed, we question whether this will be sufficient to avoid noise problems for new residents.

6. HGA4 – North of Usworth Hall

6.1 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?

If allocated, this site for over 200 houses will be a significant intrusion into open countryside. We are concerned that it will have a noticeable impact on the width of the Green Belt between Sunderland and South Tyneside in this location

6.2 Are all the policy requirements within HGA4 necessary and clear to the decision maker?

No comment

6.3 Is the site deliverable?

We do note that areas around this site are in a Flood 3 Risk zone which may affect deliverability.

7. HGA5 – Fatfield

7.1 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?

We are concerned that this site, for 32 houses, would be an island development detached from the main settlement of Fatfield. While we accept that there appears to be a number of such island settlements in this location, we do not accept that this is a reason for a further one to be established.

We note that a buffer is proposed alongside the A182 but the plan also shows a site from which there are important panoramic views down the river Wear. While this is in the opposite direction from the proposed development, bringing housing up to this area appears unacceptable.

The site is also named as Greenspace at James Steel Park. We do not believe that the impact on the Park has been fully assessed here. In principle, the loss of a part of the Park, which is also within the Green Belt, appears unacceptable.

7.2 Are all the policy requirements within HGA5 necessary and clear to the decision maker?

It appears to us that the Site Selection assessment is particularly vague with regard to the potential impacts on this part of the Green Belt and the Park.

7.3 Is the site deliverable?

We accept that roads in the area may well mean that this site is deliverable within the meaning of the 2019 NPPF but we still question its acceptability in view of our comments above.

8. HGA6 – Rickleton

8.1 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?

We note that the General's Wood (in County Durham), which may not adjoin this site but is very close, is Ancient Woodland (see note in Site Selection report for this site). Ancient woodland is a Category 1 constraint as defined in the Green Belt Assessment but this is not shown on Category 1 Constraints Plan for Fatfield and Biddick Woods in the Green Belt Assessment. Given the importance of Ancient Woodland and the requirements of the NPPF in respect of this, we believe it needs to be fully clarified just what impact this proposed allocation may have on the General's Wood. This applies notwithstanding that there are other developments in the vicinity of this wood.

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

We are concerned about the loss of a playing field within the Green Belt.

8.3 Are all the policy requirements within HGA6 necessary and clear to the decision maker?

If this site is allocated, we certainly believe issues relating to the ancient Woodland must be fully clarified.

8.4 Is the site deliverable?

We question whether at present it is if the site is currently allocated as a playing field.

9. Infrastructure

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

While CPRE believes this is critical, we do not have sufficient information to be able to comment

10. Delivery

10.1 Are the assumptions about the rate of delivery of houses from sites in Washington realistic (anticipated delivery is shown in Appendices A, B, F and O of the SHLAA)?

We are unable to comment

Richard Cowen

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5 May 2019