

  
May 2nd 2019

## Statement of case for examination in Public

### Session 8 Tuesday 4 June 2019 Matter 7 The Strategy and Housing Growth Areas for North Sunderland

#### NE6 Green Belt, Strategic SP4, Site Policy SS4, HGA7 North Hylton

#### 2. Identification of sites

To remove Site HRA7 from the Green Belt is in conflict to National Planning Policy Framework guidelines and contrary to SCC's own policies.

The case for 'exceptional circumstances' has not been adequately argued. In the original Green Belt Assessment SSC it was well argued that HGA7 was integral to the GB, landscape, wildlife corridor etc and totally inappropriate for release being unsuitable for development. This original document 'disappeared' and was replaced by a document ignoring previous assessments and recommending release! Some of the new assessments were strange.

**The presence of the Green Belt is integral to major landscapes within the city.** It is the 'long green lung' stretching into the City so important to the attractive landscape which is integral to the 'promotion of inward investment'. The release of this part of the GB would result in a housing estate in a field in the middle of one of the most iconic views into the City. As SCC includes HRA7 within the area of protected landscapes I can only believe that they agree!

**This part of the the Green Belt serves its purpose.** It is continuous from the city centre into the countryside and beyond. Despite erroneous statements to the contrary by PBA it has excellent connectivity inland and beyond as it runs under A19. It is a clear demarcation to the intensive development north of the A1231, there are no residential developments south of A1231 and the River in a corridor stretching from the City inland to Washington and beyond. The release of HRA7 and subsequent development would set an unfortunate precedent.

The GB separates the hamlet of North Hylton from the dense development to the north of A1232. There is no reference to this hamlet with its charm, history and character in any document pertaining to HRA7. There are 7 dwellings and a pub in North Hylton, to add an estate of 110 houses is surely not appropriate.

The GB at this point, North of the River Wear, is narrow and incorporates Strategic Wildlife Corridor/Green Infrastructure. East/West it runs continuously punctuate only by well spaced buildings and narrow lanes which do not detract either visually, from the quality landscape, or from the free movement of wildlife.

'Create a secure well defined new Green Belt boundary' NPPF. The GB northern boundary is secure and well defined by A1231. To facilitate HGA7 it is proposed to take a 'bite' from the northern boundary A1231 The new arbitrary boundaries that are proposed are neither secure nor well defined, almost impossible to defend

and having no 'regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period' NPPF. In fact the release of HRA7 from the GB would devalue the GB in this area so much that there would be no argument for any GB to remain east of A19. I note that Hellens have already asked for adjacent land to become 'safeguarded'.

Is there a minimum width for GB to remain viable? I can find no reference to it in NPPF. The suggested 'new' boundaries leave a pinch point of mere metres, much of it the tarmac of Ferryboat Lane. This appears to have 'little regard' to its permanence in the 'long term' and I doubt it will 'endure' this plan yet alone beyond 'the plan period'. The width of the remaining GB north of the River Wear is unviable and leaves the GB east and west indefensible.

### 3 HGA7 - North Hylton

#### 3.2 Mitigation

- One **cannot** mitigate against the loss of Green Belt, which serves its purpose, at HRA7. It will effectively result in the total loss of GB east of the A19.
- One **cannot** mitigate against intruding and despoiling important strategic views of the city. Identified as from the elevated positions of A19 Bridge and Claxheugh Rock by SCC. No amount of 'sensitive design and planting' can mitigate for placing an isolated housing estate in a field within the stunning view from these vantage points of the GB. In their landscape assessment SCC have committed to protect these views.
- How does one mitigate for the loss of veteran trees? Their presence adds an extra dimension to the strategic views. 'Sensitive landscaping' with a few 'estate' saplings will never replace the visual or ecological value of veteran trees, especially the oaks. I cannot see how leaving the trees in the development would be an option as once the root runs are protected the land available for 'development' would be so reduced that one must question its viability. Veteran trees are usually considered an unsuitable inclusion in a development and are felled for the very reason they are classified as veteran. Ten of these trees are now subject to a TPO for their landscape value.
- The GB/Strategic Wildlife Corridor is so narrow at this point that there is no land available to mitigate for HRA7 intrusion into the Strategic Wildlife Corridor. SCC are committed to 'protecting and enhancing these corridors and improving connectivity where there is a weakness.' HRA7 all but severs the corridor north of the River. It is not just the footprint of the 110 houses with the associated infrastructure that would be detrimental to the biodiversity but the pollution caused by light, noise, traffic, people and pet pressure etc. It is difficult to understand how supporting an intrusion of this magnitude can be considered protecting the corridor. Few would improve connectivity by advocating severance!
- The Coastal European Directives will not be adversely effected[3.1] and I appreciate that the nearby SSSIs are geological but where is the data on the flora and fauna of adjacent environs to HRA7?. I have been unable to find any specifics on Sites of Local Conservation Interest within SCC other than that they have been surveyed by Durham Wildlife Services. There is so much more to SCC duty of care 'to protect and enhance biodiversity' than to say they are adhering to European Directives as the easy option.
- I fail to understand why there appears to be a reluctance for engagement with the public. Financially it would be impossible for SCC or any other LA to rely purely on external bodies to survey the Borough. Sites must be surveyed and monitored throughout the year, in all weathers at all times of day if a com-

prehensive picture of the biodiversity is to be completed. If one doesn't know what is there one cannot 'protect and enhance'. Corridors by definition are to facilitate the free movement, impossible to monitor in a snap visit.

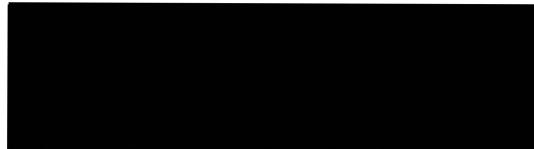
- HRA7 is surrounded by a mosaic of habitats that are of biodiversity interest and integral to the Strategic Wildlife Corridor. The site is host to veteran trees considered prime habitat for insects, birds and bats - especially the oaks. The woodlands, scrub and hedgerows offer feeding, roost, nest sites for birds, mammals and insects; the linear features are a flyway for hawking bats. Grassland/wildflowers are home to many insects, moths, butterflies and mammals so important in the food chain to higher species. HRA7 is adjacent to the River Wear with its mud flats and saltmarshes with their associated flora and fauna. Most of these habitats would be highlighted by other LAs The stream which bisects the site is a wildlife link which originates on the Nissan site. Yet none of this has been noted anywhere. The Hellens Ecological survey is of little consequence as it appears to be a cursory glance, neither time of day nor duration of visit has been included. Many observations are open to question and in some cases just wrong.
- The saltmarsh/mudflats will be adversely effected by increase footfall of people and domestic animals causing disturbance and damage to plants and animals. Saltmarsh flora is always of interest and often rare; the fauna, mainly birds often in large numbers, can be seen feeding and roosting. The River Wear wildlife corridor is Strategic because it is important as a major flyway for migrants, a stopping off point for refuelling and a home for residents including the otter, which breed just below the site
- The lack of a boundary hedgerow south of HRA7 not only detracts from the biodiversity and connectivity but also exasperates the run off from the field causing problematic flooding of Ferryboat Lane
- I believe there is an over estimate of the housing needs. Opportunities for imaginative use of other sites has not been fully explored. To earmark GB release at HRA7 for a 110 housing estate is totally wrong. There can be few places where the landscape, character and biodiversity of one of the hidden 'gems' of the City would be more adversely effected. Sequentially there are many more appropriate sites. Windfalls? The Civic Centre? A site which surely must become available within the Plan period.
- This is an isolated housing estate in a field. Being remote from all amenities it is traffic generating development with no active bus stop. Traffic would discharge onto A1231 at a small congested junction. Partly due to gradients any infrastructure improvements would need to be extensive and have to be facilitated by reducing the size of the development site or further ingress into the remaining GB/ Wildlife Corridor.
- There is very little mention of the site adverse impact on the Coast to Coast cycleway, ridden by many thousand each year. Not only the impact on the view greeting riders but also the dangers of a narrow lane becoming a busy road.
- Are 110 houses realistic? Is that figure for one or two fields? If all environmental constraints are observed ie the TPO veteran trees are retained and protected, the wooded stream is retained and enhanced, buffer zones to neighbouring environs and the footpath are planted. Is there not a requirement to supply greenspace within a development? All this coupled with the necessary infrastructure, especially the access road, appears to make 110 dwellings somewhat ambitious.

The number of errors within much of the evidence can only be explained by the fact that there has been a

lack of site visits. No decision of this magnitude should be decided on a laptop. We find it distressing the developers are already on site doing what appears to ground investigations and marking distances. Is this not very presumptuous and illustrate the 'uneven playing field' we have felt throughout the whole process

To remove HRA7 from the GB is totally inappropriate. There appears to be so much conflicting evidence from various aspects of SCC one wonders why it was ever included. 'Exceptional circumstances' have not been proven especially as there appears to be gross over estimation of housing needs

**The release of HRA7 is just wrong and irreversible. If agreed it will be to the detriment of Sunderland, its inward investment and its people for years to come!**



M.P.Carruthers