

Springwell Village Resident's Association Response to inspector's questions

1.1 Is there any evidence that the Council has not complied with the Statement of Community Involvement(SCI) or otherwise not met the minimum requirements for consultation and publicity has otherwise been inadequate at various stages of the LP process?

Publicity at the Growth Options stage in the plan was inadequate and knowledge of the process within the community was very poor. Springwell Village Residents Association (SVRA) had to step in and publicise it in order to make residents aware of the implications. (Appendix 1 shows the poster)

Page 3 para 4 of the SCI:

“Community involvement is not simply a matter of ticking a box in response to a question or targeting those groups familiar with the planning process but requires genuine participation that will help shape the future of Sunderland. Therefore the council will seek the most effective ways to engage stakeholders and all sections of the community in the planning process. The council firmly believes in the importance of an intelligence-led approach: consultation and involvement is an essential part of this.”

The Council did not comply with the SCI in a number of ways:

1. The Council did indeed make this a matter of ticking the box. And we refer you to our previous comments where we have cited concerns about the strict requirement to complete the forms and the attendant difficulties.
2. The process was weighted heavily in favour of groups familiar with the planning process, such as developers.
3. At no point was genuine participation encouraged. Attendees at events were presented with a fait accompli. Officers dismissed concerns expressed by residents, including with regard to road infrastructure and the potential over-subscription of the village school
4. Explanations from officers were contradictory and demonstrated complete lack of knowledge of local conditions and we witnessed no attempts by council officers to take away any comments from local people.
5. The Council refused point blank for officers to attend a public meeting to explain their thinking.
6. There was a heavy reliance on on-line engagement which did not suit an elderly population and was very often not working properly or at all.
7. There was no facility provided for groups of people to submit common comments. See Appendix 5 for the entirely inadequate and impractical suggested form and Appendix 6 for the covering email trail

We therefore maintain the “most effective” ways of engaging stakeholders were not employed.

No options were presented. Local people were not given choices.

Appendix 2 is evidence that SVRA tried at the highest level to raise awareness in the Council and resolve issues

Appendix 3 is our complaint to the Planning Inspectorate

Appendix 4 is our complaint to the Ombudsman. No response has been received.

Further evidence that the council did not seek genuine participation is that there was no account taken of around 8000 comments overwhelmingly objecting to the plan. Yet modifications were made in response to a small number of developers.

Appendix 7 is correspondence with detail of concerns to the Chief Executive

We maintain that engagement was not effective and when people did engage their views were ignored – so the process was fundamentally flawed.

Appendix 8 – our original comments on the Growth Options at the first stage of Plan development as evidence of consistent disregard of residents' view by the Authority

Appendix 9 is Springwell Village Residents Association credentials

2. Compliance with Duty to Cooperate, particularly in relation to housing needs.

We refer you to Mr Blundell's evidence re double counting of numbers of jobs and houses throughout the twelve Authorities in the North East. We consider the DtC has not been discharged.

SUNDERLAND CITY COUNCIL

LOCAL PLAN

THIS IS YOUR CHANCE TO CHOOSE WHICH GROWTH OPTION YOU WANT TO SEE INCLUDED IN THE LOCAL PLAN.

THE LOCAL PLAN WILL DETERMINE HOW LAND IS USED OVER THE NEXT 18 YEARS.

THE HIGHER THE GROWTH OPTION– THE MORE LIKELY IT IS THAT GREENBELT LAND WILL BE NEEDED

YOU CAN CHOOSE LOW, MEDIUM OR HIGH GROWTH BY TICKING THE APPROPRIATE BOX.

OR YOU CAN DECIDE NOT TO TICK A BOX AND STILL MAKE COMMENTS. THIS IS WHAT THE RESIDENTS' ASSOCIATION HAS DONE.

COMPLETE THE FORM AND LEAVE IT AT THE HALL – WE WILL DELIVER IT TO THE COUNCIL

NO NEED TO DO THIS IF YOU HAVE ALREADY RESPONDED ONLINE

**Here is a summary of the comments residents
voted to make:**

**1. Growth is supported but not at the expense of greenbelt
land**

**2. Existing proposals to delete greenbelt land for job
creation are enough to support growth**

**3. The number of houses to be built should not be based on
the number of jobs that MIGHT be created**

**4. The priority should be to develop the many brownfield
and previously used sites because this would improve the
attractiveness of Sunderland as well as providing for jobs
and new houses**

Kathryn Stule

From: liz [REDACTED]
Sent: 07 November 2017 08:23
To: 'Louise Moody'
Cc: [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: Core Strategy and Development Plan

Thanks Louise for this very thorough response. At last we have a clear view from the Council on exactly how you consider you have met statutory requirements.

Where I do not agree, I have made a few comments in red below. And I still stand by my original comments that were made on behalf of myself and Springwell Village Residents Association.

These comments were made at a very early stage with the sole intention of helping the council make the consultation process more effective – not simply complain.

And you will recall they were only made against the background of refusals by your more senior officers to change their policy of not allowing planning officers to attend residents meetings to explain the thinking behind the proposals in the plan. In my experience this is unheard of and I still believe it was a very bad move because refusing to meet the people you serve can only make them think there are things to hide or things that cannot be explained. It certainly does not help convey an open and honest approach by the council.

I was sure that if a planning officer could attend our public meeting, many issues could have been explained. Aware of time running out, and having had refusals from senior officers, I was left with no alternative but to escalate this to the Chief Executive.

She was on leave at the time and unfortunately, in an effort to make quick progress her PA forwarded my email to Les Clark who sent me the same comments as he had previously – the same ones he sent to Springwell Village Residents Association - so no help. On her return she did not reply until prompted – and then had not fully appreciated the issue of officer attendance at meetings. But she promised to look into the correspondence re the consultation. After another prompt she responded saying the statutory requirements had been met but with no explanation.

By this time it was much too late for any remedial action anyway. It is obvious that the more senior officers have not listened to my and comments made by our residents association, and moreover do not see the need to respond properly to residents. Standard emails saying the same things over and over again, delays in responses particularly from the Chief Executive, refusal to reconsider the policy on officers attending public meetings despite a number of justified requests all point to a lack of interest in our views.

This has been frustrating and disappointing for a staunch supporter of Sunderland Council. I think now we have to draw this to a close and hope that lessons can be learned for the next stage.

I have to thank you because in all of this you have been the only one who has been clear, able and willing to explain things. I have copied everybody who has been involved to save me writing yet another email – I'm sure they are all as tired of this as I am!

Best wishes
Liz

From: Louise Moody [REDACTED]

Sent: 06 November 2017 12:00

To: [REDACTED]

Subject: FW: Core Strategy and Development Plan

Dear Liz

I hope you are well.

Councillor Dorothy Trueman and Councillor Henry Trueman asked if I could send you a response to the email you sent on 25th October.

The Council has sought to ensure that consultation on the Core Strategy and Development Plan is as open as possible and have gone beyond the legal requirement to ensure that the consultation was fair, transparent, proportional, effective and inclusive. The legally requirements for undertaking community involvement at this stage in the production of Local Plan documents are set out in the Town and Country Planning (Local Planning) (England) Regulations 2012. The Council has met and exceed all the statutory and legal requirements at this stage in Plan preparation. However, consultation must be proportionate in resources to the scale and impact the Plan has on the community.

At Regulation 18, the Council is legally required to notify statutory consultees and consultation bodies (those on the Councils Local Plan database) of the subject and invite them to make representations. Consultation normally last for six weeks, however there is no legal time limited. The Council is also required to be in accordance with its Statement of Community Involvement. The purpose of the SCI is to explain how the statutory requirements listed above will be met and how the Council will engage with local communities and stakeholders in the preparation of a local plan.

The purpose of the consultation of the Draft Core Strategy and Development Plan (CSDMP) was to give people the opportunity to have their day and inform the next version of the Plan. In order for the Council to accurately record people's views all representations must be submitted to the Council in writing. The Council endeavoured to make this as easy as possible by preparing a consultation form which was available in print, word version and PDF, setting up a consultation portal where people could complete a questionnaire or submit their views against each policy and by encouraging people to write to us wither via post or email. At the event Officers were available to assist people completing their representations. **(This didn't happen at the events I attended)** The Council printed and distributed over 3000 copies of the Form. At the request of residents groups including Springwell Residents Group, additional copies were printed and representatives collected these. I am not aware that at any event the Council did not have insufficient forms available. **(There wasn't enough at the event I attended and residents were not encouraged to complete them)** In addition, the Council printed over 2000 site leaflets which were handed out at the events. Also at the request of Springwell Residents Associate large format versions of the form were created. Copies of these were available at the events.

Normal practice at this stage would be to undertake a six weeks consultation, but in recognition of the importance of this Plan and that it coincided with summer holidays the Council extended the consultation by an additional two weeks.

The Council has gone beyond the legal requirements of 'notifying consultees on the Local Plan database' by distributing leaflets to every household to inform as many people as possible of the consultation. In accordance with the above Regulations and the SCI, the Council only has a requirement to inform "consultees" which are the individual, businesses and organisations currently registered on our Local Plan database. In addition to the leaflet distribution, the Council sent Letters/Emails to all consultees in the Local Plan database, Statutory Consultees, Members and MPs.

The Council held over 30 events across the city during the consultation period. The purpose of these events is to inform people of the contents on the CSDMP and to give people the opportunity to ask Officers any questions they may have. The drop in events were designed to provide all attendees with an opportunity to read the exhibition boards and to speak to a Planning Officers. (see my comments that were submitted on my own behalf and on behalf of Springwell Village Residents Association. There were not enough officers and some of them had no local knowledge and therefore could not properly answer questions because they did not appreciate the context against which the proposal are being made eg existing road network, parking, local services) In total 1189 people attended these events. Given the level of turn out it would not be possible for the Council to accurately record the conversations at these events and it is clearly preferable that written representations are sought to ensure respondents put their comments in their own words. I agree it is preferable – but at one event I attended people, particularly the more elderly in our community, were expecting officers to take account of the things they were saying and were not always being asked to write those things down. Nor were they being helped to write those things down.

The consultation and events were widely publicised via distribution of the main consultation leaflet to every household across the City (by an independent mail distribution company), plus posters, press release notices and articles, as well as on the Council's website Home and Planning pages linking to the consultation portal. Articles about the consultation were published on the national Planning Resource website on 4 August 2017, and on 7 August 2017 in the Sunderland Echo newspaper and on the Council's Make it Sunderland and the ITV News websites, with it also featuring in a television news bulletin on the local BBC Look North (North East and Cumbria) programme. A related article was also published on the local SunFM 103.4 radio station website on 11 August 2017, with the Council's Head of Planning & Regeneration Iain Fairlamb being interviewed about it on BBC Radio Newcastle on 14 August 2017.

A series of five sub-area based pre-consultation briefing workshop sessions for local elected Members were also attended by 25 councillors.

All documentation was also made available in printed form at the Councils Libraries and the Civic Centre. Leaflets and Forms were also available at these venues.

All representations that have been submitted to the Council during the consultation period have been recorded and the Council is currently reviewing these. In the early new year the Council will publish a Consultation Statement alongside the next version of the Plan. The Consultation Statement will set out

- The number of representations received;
- The key issues identified in the representations; and
- How the Council has addressed the issues in the next version of the Plan.

The Council will also publish on its website a Representation Schedule which will summarise each representation received and set out how the Publication version of the Plan has addressed the representations.

Regards

Louise Moody



From: liz [redacted]
Sent: 25 October 2017 18:44
To: Irene Lucas
Cc: Cllr Henry Trueman; 'Cllr Bernard Scaplehorn'; Cllr Dorothy Trueman
Subject: RE: Core Strategy and Development Plan

Dear Irene

Thanks for the response. It would have been helpful if you had informed me that you had carried out your review of the correspondence and let me have your findings. It is disappointing that a reminder was again needed.

Your second para is not clear, but if I understand it correctly your response to my concerns about the consultation process and events is that all complied with statutory guidance. I disagree. I quote below from planning guidance

“Local peoples’ views are vital in shaping a local plan, helping determine how their community develops”

NPPF:

155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.

Sunderland may well have engaged with neighbourhoods – but you certainly did not record what people within those neighbourhoods said. Both events at Springwell Village were billed as consultation events but people’s views, concerns and questions were not recorded so there was no two-way exchange. Therefore no consultation.

Additionally, residents clearly stated they could not go online and there were not enough hard copy forms for them to complete. The same circumstances were reported from other events in other areas. And your refusal for officers to attend public meetings to explain their thinking and answer questions exacerbated the situation. Therefore the engagement was not meaningful. So I do not agree there was compliance with statutory guidelines.

More to the point, many residents of Sunderland have not had their views recorded so the results of the consultation cannot possibly be representative – it cannot possible be “a collective vision”.

You have had a full note of the many reasons for the consultation process being inadequate for some time. Again other areas have echoed these concerns. I have had the standard response many times now so I see no point in reiterating.

As we seem to be getting nowhere I have asked my ward members to take this matter up with you.

Regards
Liz

From: Irene Lucas [REDACTED]
Sent: 25 October 2017 13:10
To: 'liz' [REDACTED]
Subject: RE: Core Strategy and Development Plan

Dear Liz,

I did review the arrangements surrounding the process of consultation and they were in accordance with statutory guidance.

In relation to your wider point about officers not recording concerns, whilst it would be impossible to say that this is not the case, as I am not aware which comments you feel were not recorded, it is fair to say that thousands of comments were recorded during the process.

At the moment the teams are going through this body of evidence as part of the consultation process and will publish their response when they have completed that exercise.

Kind regards,

Irene

From: liz [REDACTED]
Sent: 25 October 2017 09:47
To: Irene Lucas
Subject: RE: Core Strategy and Development Plan

Apologies if I have missed anything but I cannot track a response to this.
liz

Good morning Irene

Having reviewed the correspondence I am wondering if you have any further comments to make on this?
And also wondering when comments on the draft Core Strategy will be uploaded onto the website?

From: Irene Lucas [REDACTED]
Sent: 19 September 2017 09:26
To: 'liz' [REDACTED]
Subject: RE: Core Strategy and Development Plan

Good Morning Liz,

My apologies, the email was in response to your enquiry to Janet Harrison, my p.a. regarding whether or not I had seen the correspondence you sent into the Council when I was on annual leave.

So my email of yesterday addressed that issue alone.

I was unaware that you had asked for a review of the policy. I will review the correspondence which came into the Council when I was on leave. Nor was my email dismissive in any way of your desire to have representation at the meeting. I am not dismissive of such requests.

The consultation process is a very important to us and often results in changes to final documents.

I will discuss with officers the issue about note taking at the meeting and check that they understand resident's concerns. If there is any uncertainty regarding those concerns I will ask planning colleagues to contact you directly.

Kind regards,

Irene

From: liz [REDACTED]
Sent: 18 September 2017 16:43
To: Irene Lucas
Cc: [REDACTED]
Subject: RE: Core Strategy and Development Plan

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Thanks Irene

You are correct that I would not have appreciated a repetition of what had already been said. I wouldn't call it advice – just reiteration of a stock reply giving the impression that I was not being listened to.

The point of contacting you was to try to influence a change in the policy of planning officers not attending meetings to explain their thinking behind the Core Strategy and Development Plan. Springwell Village Residents' Association made this request on a number of occasions because the consultation process to which officers are wedded is not working for people in Sunderland. I did attach a copy of the concerns re the consultation process to my original email.

By your response below I take it that you too are wedded to this clearly inadequate process, so I can only express disappointment and reiterate the concerns that residents' views are not being listened to, their questions are not being answered, the events are poorly run and understaffed by officers who are giving mixed messages and with little or no local knowledge.

The very fact that officers are not recording any issues raised by residents serves as evidence that they have no intention of either responding properly on an individual basis or taking them into account when reporting the results of the consultation and when considering a redraft of the Strategy.

So in my view this is not real consultation and is disrespectful of the people officers are supposed to serve.

This consultation process is not fit for purpose – unless of course the purpose is to plough ahead without regard to what people think.

This was a real attempt at putting this right. To help put some remedial measures in place before it was too late.

I'm sorry you feel you cannot do anything meaningful to address these concerns.

Regards

Liz

From: Irene Lucas [REDACTED]
Sent: 18 September 2017 15:58

To: [Redacted]

Subject: Core Strategy and Development Plan

Dear Ms Reid,

My p.a. did let me have sight of the correspondence regarding the consultation events when I returned to the office.

I asked, at the time of reading, if a response had been sent out to you and was advised that it had. I understand that Les Clark had already responded in keeping with the advice which had been given to other similar requests.

In these circumstances, where it is clear that you had already received a response, I would not respond just repeating the advice already given to you.

Kind regards,

Irene

Irene Lucas CBE

[Redacted]

[Redacted]

[Redacted]

[Redacted]

APPENDIX 3

Springwell Village Residents Association

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

The Planning Inspectorate Plans Team
3G Hawk Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Dear Sirs

I wish to complain about Sunderland Council's consultation process on their Core Strategy and Development Plan.

I am the Chair Person of Springwell Village Residents Association, representing around 1600 people in 1000 households.

Sunderland Council embarked upon the consultation process in August 2017. The first of many events throughout the borough was held in Springwell Village. It did not go well. We immediately wrote explaining what went wrong in the hope that things could be put right. I attach the letter.

One of the main problems was that officers were unable to answer many of the questions put to them by residents. And there were often two opposing answers to the same question. Residents were keen to have an officer come to a residents' meeting so that everyone could hear the rationale behind their proposals and better understand the Strategy.

Many requests for this were denied – Sunderland was wedded to their process that in no way could be regarded as proper consultation. Attendance was not properly recorded, no residents' views, comments or questions were recorded, terms and conditions were not available, officers had little or no local knowledge (so they did not understand the effect of proposals) and there were not enough consultation feedback forms for residents to complete, no help to complete them (essential for some residents).

An email to the Chief Executive from one resident asking for the policy of preventing officers from attending public meetings to be reviewed was misunderstood, passed around and ultimately elicited no action. I have attached the email trail. The Chief Executive clearly has no grasp of good customer service or of the requirements of consultation. That, despite being quoted NPPF 155.

Our conclusion is that the process was not fit for purpose and people have been simply ignored. I trust you can take some action to redress this situation.

Yours faithfully,

Angela Templeman, Chairperson

Which body (council, authority or care provider) are you complaining about?

	Sunderland City Council
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Have you complained to the body already? Usually, you should have completed all stages of the body's complaints process before we can look at your complaint.

	Yes
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Please say when you complained to the body. (We will need to see the letter from the body that confirms you have completed their complaints procedure – you will have the opportunity to upload this at the end of the form.)

	If you don't have your letter and can't remember when you complained, put 'don't know' in the box
	August 2017

What do you think the body did wrong?

	Please explain briefly what your complaint is about, including dates of any incidents and names of any officers or staff of the body complained about, if known. Please also explain why you are not happy with the response from the body concerned.
	If your complaint involves a child it would be helpful if you could provide their full name and date of birth.
	Failed to properly consult residents on their emerging Core Strategy and Development Plan and failed to take remedial action when the failings of the process were complained about

How has this affected you?

	Please explain briefly what impact the problems you've described above have had on you.
	For example, has the body concerned failed to provide you with a service or a benefit you are entitled to?
	Was there a delay before you got the service or benefit? Have you suffered a financial loss? Have you been put to a lot of trouble or inconvenience?
	Failed to gather and properly record residents views on proposals to delete greenbelt land and therefore failed to properly consult or been able to listen to views and concerns

What do you think the body should do to put things right?

	Stop the development of the Local Plan and re-consult
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More help

	If anything makes it difficult for you to use our service, for example if English is not your
--	---

	first language or you have a disability please use the text area below to tell us how we can help you.
	If you do not require any more help, please leave this box blank.

Contact Details (on Behalf)

Are you completing this form on behalf of someone else ?	Yes
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Representative type

Please select one of the options	Advice Centre (Other)
Please tell us why the person is not making the complaint her/himself	this is on behalf of Springwell Village Residents Association, representing the community of 1600 people living here - not one person

Representative Name

Title	Mrs
First name	Elizabeth
Surname	Reid

Representative Address

House number/name	██████████
Address line 2	██████████
Address Line 3	██████████
Town	██████████
Post code	██████████
Email Address	██████████
Confirm Email Address	██████████

Representative Telephone

Daytime Contact Phone Number	██████████
Mobile	██████████

Name

Title	Mrs
First Name	Angela
Surname	Templeman (Chairperson)

Address

House number/name	█
Address Line 2	██████████
Address Line 3	██████████████
Town	██████████
Post code	██████
Email Address	██
Confirm Email Address	██

Telephone

Daytime Contact Phone Number	
Mobile	

If you want to upload a file in support of your complaint you can do so below

	This complaint form will only accept one attachment and we have a maximum file size of 8MB.
	We allow the following file types: txt; pdf; doc; docx; ppt; xls; xlsx; wav; mp3; jpg; gif; tiff
	If your file is larger than 8MB, please do not attempt to send it, as your complaint may not get through to us.
	Please do not send any other documents at this stage. We will discuss with you what other documents we need to see.
File 1	Comments-on-the-consultation-august-2017-Final-submission.docx

How did you find out about the Local Government Ombudsman?

	Government department
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Kathryn Stule

From: Louise Sloan [REDACTED]
Sent: 28 June 2018 09:51
To: 'liz'
Cc: 'Pauline Cooper '; Planning Policy
Subject: RE: Springwell Village
Attachments: Group Form.docx

Hi Liz

Yes planning is never the easiest.

This is different to previous rounds of consultation, which is why the Planning Inspectorate advises using their form. As at this stage you are being asked if you considered the Plan to be 'Sound'. If you do not consider the Plan to be sound you need to tell the Inspector why which are the tests listed in question 3.

We would recommend that each individual submits a form(s). However, if you wish to submit representations on behalf of the group I would recommend that you complete the form(s) and attached a signature sheet (see attached) to each form. That would mean that if you are submitting 10 forms people would have to sign 10 sheets if they wished. I think this would be the easiest for the Planning Inspector.

I know this is more onerous but we do require personal details and a signature due to GDPR regulations. Since the Council sent the letter/email out informing residents of this round of consultation on the Plan we have received a significant number of phone calls, emails and letters from individuals who signed the Springwell Letter last year unaware why they were being contacted by the Council and requesting to be removed from our database. A number of people have informed the council that they did not sign the letter even when we have sent them copies of the letter we received. Some individuals have requested that their submission is deleted.

That is why it is important for us in accordance with the new GDPR regulations that people are aware that the Council will be storing their personal data until the Plan is adopted.

I hope this helps

Please give me a call if you wish to discuss further. Please be aware I am on leave this afternoon until Monday

Lou

Louise Sloan

From: liz [REDACTED]
Sent: 27 June 2018 19:26
To: Louise Sloan
Cc: 'Pauline Cooper '; Planning Policy
Subject: RE: Springwell Village

Thanks Lou – goodness this is indeed complicated.

The Plan itself is really complicated and residents find it long and difficult to understand, assimilate and work out the implications of the many policies. Residents here voted us in to give leadership and help them with things such as this and as you know in the past we have drafted letters for residents to sign and add their own additional comments. Each letter has name, address and is signed by each resident.

In the scenario below we would have to guide each resident to complete a form for each objection – ‘say’ ten each if the last round is anything to go by. At the last round 1340 letters were signed – so that would be 13,400 forms.

Or if we aggregate onto one form per policy, we would have to record name, address, email address and signature from each of 1340 people for each form separately.

Imagine standing on 1340 doorsteps asking people to sign something ten times – it just is impossible.

Could we draft letter as we normally do and get residents to sign. Then complete one form per policy, and use the signed letters as authorisation? So one letter for each resident covering all of the comments/objections, and one form per policy covering however many residents sign (1340 in the last round)?

Would really value any advice on how we can help our residents with this whilst complying with you and the Planning Inspectorate. At the moment people are thinking the Council and the Planning Inspectorate are making this as difficult as possible in efforts to discourage people to put forward their views. And the logistics mitigate against us helping them.

Please help make this simpler and suggest how to proceed

Best wishes

Liz

From: Louise Sloan [REDACTED]
Sent: 27 June 2018 16:16
To: 'liz' [REDACTED]
Cc: 'Pauline Cooper ' [REDACTED] Planning Policy <PlanningPolicy@sunderland.gov.uk>
Subject: RE: Springwell Village

Hi Liz

The Planning Inspectorate in their guidance note

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672662/Procedural_Practice_in_the_Examination_of_Local_Plans_-_final.2.pdf) annex 1 includes a model representation from which they advise Local Planning Authorities to use at this stage.

The Council has used this form as the basis for their Representation Form.

How representations can be submitted are set out in the [Statement of Representation Procedure](#)

As stated in the letter/email and on the Councils website (www.sunderland.gov.uk/csdp), representations should be submitted using the [Representation Form](#), which is available to download on the Councils website, we have also made printed copies available in the libraries, at events and at the civic centre. These can be emailed to planningpolicy@sunderland.gov.uk or sent via the post to strategic plans, civic centre, Burdon Road, Sunderland SR2 &DN. We have also set up an online version of this form on our consultation portal <http://sunderland-consult.limehouse.co.uk/portal>. We have also produced a [Representation Guidance Note](#) to assist people when they are completing the form

Representation can be sent in via a letter or an email. However, as we are required to prepare something known as a Consultation Statement and Schedule of Representation procedures – it is useful that the forms are used. If they are not we will have to interpret which policy the representations relate to.

Please note that regardless of the format received, the Council will send all representations to the Planning Inspector

As you say, it is one form per policy, but individuals can submit as many forms as they wish.

If you have insufficient space in the boxes you can attach additional paper to the form.

If you would like to send one Form which represents a number of consultees you would need to attach a document which included the name, address, email, and signature of these consultees. You would also have to state if they wish to be involved in the next stages of plan preparation.

I understand this is confusing, if you would like to call to discuss please feel free.

Regards

Lou

Louise Sloan

From: liz [REDACTED]
Sent: 25 June 2018 08:03
To: Louise Sloan
Cc: 'Pauline Cooper '
Subject: Springwell Village

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Hi Louise

I think you know we met Sharon Hodgson MP last Friday. She said that you had told her comments on the CSDP in the current round of consultation had to be made on a form – she had a copy with her – rather than by letter. The form seemed quite complicated and there was little space to make comments – it seemed only to accommodate one comment. She said that if we wrote letters an officer would then have to interpret the letters and transfer comments to the form, also ticking the appropriate boxes.

But I have checked the Representation Guidance and it does not seem to confirm what Sharon said. So we're confused – please tell me what you would like us to do.

The Representation Guidance asks that where there are multiple comments all saying the same thing that we send in one comment with info on authorisation – what do you envisage as “authorisation”?

Best wishes
Liz

Dear Mr Melia

I am dismayed to see that the Plan is going to Cabinet with a recommendation to submit it, without any amendments being made following thousands of objections from residents of Sunderland.

Despite a flawed consultation process, heavily weighted in favour of developers and professionals, there was a groundswell of opinion against many of the policies in the plan. The report (and associated papers) recognises many times that there were "significant" numbers of objections but the modifications to the plan have been made in response to representations other than those of residents.

It would appear that one developer or landowner can achieve a modification to the plan but "significant" numbers of residents can't.

The Plan remains largely as it was before the consultation – absolutely no notice has been taken of residents' opinions.

To add insult to injury the report is introduced by quoting the need to consult properly with residents and achieve a shared vision. What a joke.

I attach previous correspondence re the consultation process for your information.

Thank you for your email regarding the Core Strategy and Development Plan (the Plan). As I am sure you are aware, all Local Authorities are required to have a Local Plan in place. The preparation of this Plan must be in accordance with national legislation, regulations and guidance. The Council will be submitting the Plan during transition and therefore the Plan is in accordance with 2012 National Planning Policy Framework.

Once this Plan is complete, the Council are required to submit it to the Secretary of State, who will appoint an independent Planning Inspector to determine if the Plan is legally sound.

The Council have been preparing the Plan for a number of years and undertaken a significant amount of consultation on the Plan. In May 2018, Cabinet approved consultation on the Publication draft of the Plan. As stated in the May report, this was the version of the Plan that "if agreed by full Council in due course, will be submitted to the Secretary of State for examination in public".

The Council hosted an extensive consultation on the Publication version of the Plan which included;

- sending letters to everyone on the Local Plan database;
- Hosting 11 events across the City;
- Presentation to Members;
- Publishing all documents online and making hard copies available in the Civic Centre;
- Making hard copies of the Plan available at Council libraries and
- Promoting the consultation activity through social media.

The purpose of this consultation was different to previous consultation on the Plan. Its purpose was to seek representation to the Plan which could be submitted to the Secretary of State.

In total, the Council received over 8000 representations from more than 2000 individuals. The Council took into consideration all of these representations, and intend to make minor (known as additional) modifications to the Plan at this stage. These are in response to material planning matters which have been raised. However I can assure you that all representations have been reviewed by the Council and will be submitted to the Secretary of State for the Planning Inspector to take into consideration during the Examination in Public. When the Council submits the Plan, a Schedule of Representations will be submitted alongside the Report of Representation which includes a Council response to all 8000 representations.

The number of representations made does not automatically give weight for changing the Plan.

Following Council approval, the Plan will be submitted to the Secretary of State where the Planning Inspectorate will be appointed to undertake an examination in public (EIP) of the Plan. The EIP will likely commence in January and will include hearing sessions which are expected to take place in the late spring. The Council will formally write to all those who submitted representations once the Plan is submitted in accordance with legislation.

During the EIP the Planning Inspector will consider all representations submitted and may ask the Council to make further modifications to the Plan. Following the hearing sessions, these modifications will be consulted on in accordance with Councils Statement of Community Involvement.

I'm afraid your reply is unsatisfactory in a number of ways.

If you had read the attachment I sent with the history of this sorry tale, you would have realised that I know the detail of the consultation process and have complained about at length. And I have also complained about sending standard responses that fail to address specific questions. So this response only serves to add insult to injury.

When individuals take the time to write personally they usually want a reply – not a policy statement. And certainly not a response that is cut and pasted from the very document they are taking issue with.

As the Chief Executive Officer you are responsible for delivering democracy. This has certainly not been done in the instance of approving the CSDP.

Your response says “The number of representations made does not automatically give weight for changing the Plan”. I understand that if representations are made on grounds that are not material than they hold little weight, but in this case the comments made by residents were indeed material so surely the number of them does count?

Inequity is a thread running through this whole report and the covering report that went to Council.

Large numbers of responses from individuals are deemed “significant” whilst responses from developers and landowners are quoted in detail. Of course one could argue that every response has significance – surely everybody counts?

So just to be clear let’s find out -and please treat this as a FOI request

1. How many responses were made by individuals residing in Sunderland
2. How many were made from individuals residing elsewhere
3. How many were from developers
4. How many from landowners
5. How many others (CPRE, University etc)

And from those categories how many comments were in support of the plan, and how many objected.

Springwell Village Residents Association delivered 990 responses, with others going directly to the council – all with many objections. As did other groups. So to bury numbers like this in words like “significant” is misleading, particularly when you have the empirical evidence to hand.

And the modifications to the plan were all in response to developers/landowners – none in response to residents.

At Council on Tuesday every member who spoke referred to this unfairness.

So you say you consult, forge an unwieldy and difficult process and when people have taken a lot of time to respond in the way you want, you then ignore what they say. This is the height of arrogance and undemocratic. And it does not fit with the NPPF aim to achieve a shared vision. I have copied Peter McIntyre here as I understand this responsibility falls to him.

I will be writing to members and will copy you – so apologies that you will be seeing some of this comments again.

I implore you not to send another standard response to me or any of my colleagues copied here as they too have expressed the same feelings.

Thank you for your email addressed to the Chief Executive, Patrick Melia.

Patrick has asked that I respond on his behalf to reassure you that all the comments and objections received will be submitted to the planning inspector, and that there will be further opportunity for all concerns received to be raised again.

Kind regards

Janet/Patrick

So no effort to refute allegations of unfairness, to explain or defend the Council's position or to address any issues in my email. In effect this is an admission that the council is indeed at fault. Above all there is absolutely no intention of putting things right.

You're now obviously trying to shift the responsibility to the Inspector but it is the Council's responsibility to listen to residents. You have the authority to submit the Plan but you need not do so. Having had your attention drawn to the blatant disregard for residents views I'd have thought you would want to revisit it. Clearly not. And in not doing so you are as guilty as those who've been involved in this over a much longer period.

In fact Patrick, you've put no effort into this at all – you've not even taken the time to answer a few emails. The arrogance throughout – not just from you - is staggering.

Whole communities – not just Springwell Village - care passionately and are worried about their futures. You have no right to ignore them you have no right to expect an Inspector to know more about Sunderland and its needs than Sunderland Council does. He/she will obviously give much weight to what the Council proposes, assuming that the Council represents the best interests of the people who live here. We will of course use our best efforts to put him/her right on this but it would be much better if it were not necessary.

You have let many people down by not listening to them– around 2000 using your figures. And probably many more who found the consultation process impossible. The 8000 comments specify exactly how the council has overestimated housing need and therefore has used flawed figures to push through a Plan to satisfy developers and the ambitions of a few, a plan that does not address real need at all. You should read them to get a true picture of what is going on. The Plan includes contradictions eg It seeks to “protect the setting” of Springwell Village and proposes decimating it. I could go on but see no point as you have demonstrated no interest at all.

Please confirm the request for data through the FOI Act is being processed.

1. SVRA considers the considerable loss of greenbelt land which it supported within the IAMP proposal enough to deliver growth. Further loss of greenbelt land would adversely affect the attractiveness of Sunderland and its offer as a place to live and a location for business
2. Whilst SVRA supports growth in the economy through job creation:
 - This should not be at the expense of further greenbelt land
 - The number of jobs created does not in itself dictate that significant numbers of houses should be built on greenbelt land
 - Recognising recent falls, the number of houses to be built should reflect realistic population estimates
 - The Council's priority should be to secure development on brownfield and previously developed sites – of which there are many – which would improve the physical appearance, environment and attractiveness to people and businesses. Using greenbelt land on which to build houses will see current brownfield sites remain undeveloped and perpetuate an appearance of dereliction within Sunderland
3. To improve the economy in Sunderland, development should be targeted at the inner areas
4. SVRA urges caution in relation to the number of new houses to be built:
 - Case studies on other areas where there have been projects such as IAMP indicate that initial projections for new housing have been grossly overestimated
 - New houses do not mean that jobs will be created and new jobs do not necessarily require new houses – local integrated transport systems facilitate commuters, the nature of the modern labour market (low pay, short term contracts etc) lowers the ability of people to move house and local patterns of work show people often do not live and work in the same borough
5. Once greenbelt land is lost it can never be regained

April 2019

To: The Planning Inspector

The attached documents are the credentials of Springwell Village Residents Association. they are as follows:

1. Constitution
2. Minutes of a public meeting where it was unanimously agreed to resist developments on the greenbelt
3. Details of comments, objections and petitions on planning applications on the greenbelt

SPRINGWELL VILLAGE RESIDENTS' ASSOCIATION CONSTITUTION

1. Name

The name will be SPRINGWELL VILLAGE RESIDENTS' ASSOCIATION, hereinafter referred to as "The Association" or the SVRA.

Area The area covered by The Association is Springwell Village.

2. Aims and Objectives.

- a) To maintain the distinctive identity of Springwell Village and its envelope of green belt.
- b) To promote the well-being of residents by planning, action and careful maintenance.
- c) To involve the community in environmental protection matters and seek to improve other services in the area.
- d) To represent the views of residents to appropriate authorities and outside bodies.
- e) To raise awareness in people, particularly the young, of the need to care for and improve all aspects of village life by personal voluntary service and involvement.
- f) To influence and to make contribution to the future planning of the Village.

3. Membership.

- a) Full membership is open to any person over 18 years of age who is resident in the Village, and such member is entitled to speak at any General, Annual General or Extra-ordinary Meeting. They may attend, but not speak or vote at, any Committee Meeting.
- b) Associate membership is open to any person over the age of 18 years who takes a constructive interest in the welfare of the village.
Associate members will have speaking, but not voting, rights.
Both types of membership, when granted, require true observation of the aims and objectives of The Association
- c) Membership shall end when a member ceases to reside in the area covered, or resigns. In the event of gross misconduct membership may be suspended, or terminated, at the discretion of the Committee, by a simple majority vote. The member will be advised of this decision, in writing, within 7 days; the member must be notified of his/her right of appeal and such an appeal against termination of membership may be lodged with the Secretary, in writing, within 7 days.
Any appeal will be considered by the full Committee and a final decision made within 14 days of receipt of such an appeal. The appellant will be advised of the final decision, in writing, within 7 days.
Any member whose membership has been suspended or terminated in accordance with the above shall be entitled to have this decision reviewed at the next General Meeting.
- d) All members are required to support the SVRA and to promote to its aims and objectives.
- e) Membership shall be non-party political and promote equal opportunities.
- f) Discrimination on the grounds of race, gender, sexuality, disability or religion shall be actively prohibited.

4. Committee

The Committee shall consist of a Chairman, Vice-Chairman, Secretary, Treasurer and at least three other elected members, to a maximum of eleven.

It may co-opt new members as necessary.

Any co-option shall be ratified at the next General Meeting.

Elections for the Committee will be held at the Annual General Meeting . The Committee standing down at the AGM may be re-elected

Committee members must declare an interest where their duty to the SVRA competes with a duty or loyalty they have to another organisation or person. Where a member is found to have an undeclared conflict of interest, the Committee can vote to remove that Member by a simple majority. If the removed Member wishes to appeal, they must do so in writing to the Secretary stating their reasons within 14 days. The appeal will be heard at the next full meeting of the SVRA.

Any sub committees or working parties shall report back to the Committee for decision-making. Officers shall report to each Committee and General Meeting on their work.

The Chairperson shall chair the Annual, General, Extra-ordinary and Committee Meetings. There shall be no more than two committee members from each household. Members of the Committee failing to attend more than three consecutive committee meetings, without submitting an apology, may be considered to have resigned.

The Quorum of the Committee shall be five persons or 40% of the full membership of the committee, at least two of whom shall be Officers. In the absence of the Chairperson the meeting will be chaired by the Vice-Chairperson. In the absence of both Chairperson and Vice-chairperson, the chair will be taken by one of the members present, to be decided by a show of hands.

In matters of emergency and if the meeting is not quorate, decisions may be taken by the members present and will be ratified at the next relevant meeting.

5. Meetings

- a) General Meetings will be held as decided by the Committee and as frequently as good management demands.
- b) The Annual General Meeting (AGM) will be held in May each year.
- c) Extra-ordinary general meetings may be called in emergencies or to handle urgent and important matters by giving not less than fourteen days' notice to the membership, by public notice.
- d) In matters of urgent and extreme nature the Committee shall be empowered to make decisions on its own authority, to be explained and ratified at the next General Meeting.

6. Rules of Conduct

- a) Decisions taken at a general Meeting shall be subject to common agreement or by simple majority of those entitled to vote.
- b) Proceedings, resolutions and decisions shall be accurately recorded by the Secretary and later presented for endorsement, in written form, at the next relevant meeting.
- c) A quorum for General Meetings shall be no less than eight members who are entitled to vote, excluding Committee Members.
- d) The Proceedings of the Committee shall not be invalidated by the failure of the SVRA to fill any appointment on the Committee.
- e) In the absence of any Officer, another member may be temporarily appointed to cover responsibilities.
- f) All communications in matters of a contractual nature shall be made by the Committee and confirmed in writing. No member shall be empowered to make verbal or written arrangements without the agreement of the Committee. Any such transactions shall be considered by the Committee to be null and void and shall not be honoured by the SVRA.
- g) The SVRA shall provide information to all its members on matters that affect the organisation and its members.
- h) A copy of the constitution shall be available on request.
- i) Minutes for all General and Committee Meetings shall be available from the Secretary for all members, by request.

7. Finance

The Financial Year shall be from 1st March to the end of February.

- a) The income and property of the SVRA, how and whatsoever derived, shall be applied solely towards the promotion of the terms of reference of the Association as set out in this constitution and fully in accord with the aims and objectives. No portion shall be paid to any member, or transferred, or directly or indirectly used, as a reward for any service whatsoever.
- b) The payment of out-of-pocket expenses to any member shall first be approved by the Treasurer. Proof of expenses should be presented for reimbursement. Prior approval of the Chairperson and Treasurer, for all spending, is required.
- c) Bank Accounts may be operated only with the express permission of the Committee.
- d) The Treasurer shall open a bank or building society account in the name of the Association and keep proper and up-to-date books, recording all transactions. All receipts and appropriate records shall be kept in a safe place and retained for inspection by the Auditors.
 - The Committee shall appoint at least three authorised signatories and any cheques shall be signed by at least two of the authorised signatories.
 - The signatories shall be from different households and not related to one another.
- e) Accounts will be presented annually to the AGM.
- f) Contractual arrangements may be made by the Committee and should be ratified at the next General Meeting.

8. Autonomy

The Association shall have its own Management, its own funding and its own decision –making autonomy.

9. Dissolution

- a) Twenty-one day notice of such a meeting shall be given.
- b) Dissolution shall proceed only on a two-thirds majority vote to “Dissolve Springwell Village Residents’ Association” by those present and eligible to vote.
- c) Instruction shall then be sought on the disposal of any assets and clearance of any debts accrued by the Association.
- d) No member shall benefit from the disposal of any assets, which will, in the absence of any other agreed method of disposal, be transferred to an agreed charity or charities.

10. Alterations

- a) Alterations to the Constitution shall only be made at an Annual General Meeting.
- b) Notice of the Annual General Meeting shall be fourteen days.
- c) Written notice of a resolution to make any changes shall be presented to the Secretary seven days prior to the date of the AGM.
- d) No alterations to the Constitution shall be accepted which may prejudice the core aims and objectives of the Association

11. Intent

- a) The SVRA will pursue its own aims and objectives as a priority. It is independent of all other Village organisations, although committed to work in harmony with all. It will encourage its members to pursue its own aims and objectives but will also encourage participation in other Village interests where these do not conflict with the interests and duties of the Association. Alliances with other organisations will be approved at a General Meeting.
- b) The Association’s purposes are clearly defined in this document.
- c) All actions will be in accordance with our Constitution and will be directed to the benefit of the whole community.

All meetings will be held in open session with full democratic discussion and voting procedures. There shall be an educational input, in as much as we seek to encourage all age groups (especially the young), to contribute to the general welfare of their village

This document is a revised Constitution approved at an Annual General Meeting held 26 May 2015 called by public notice. The detail has been checked by all committee members.

Chairperson : Angela Templeman

Signature:

Date.....

Witnessed by:

Name:..... **Signature**.....

Address:..... **Date**.....

.....

.....

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PUBLIC MEETING

25 November 2014

SPRINGWELL SOCIAL CLUB

MINUTES

Present:	Chair	A. Templeman
	Vice Chair	E. Hardy
	Secretaries	L. Pickup
		P.Cooper
	Other committee members	M. Lambton
		D.Lambton
		H. Fife
Council:	C.Mennear(Customer Relationship Officer)	
	H. Trueman (Ward Councillor, Dep Leader, Dep Chair Cabinet, Member of Standards Committee)	
	D. Trueman (Ward Member)	

62 members of the public signed the attendance list

1. The minutes of the previous meeting were agreed with one amendment:
Item 7 – Councillor Scaplehorn did attend the meeting with Hellens.
2. Chris Mennear explained that the new dog controls orders came into effect on the 18th October 2014 and they are:
 - a. Dog fouling (failing to pick up after your dog).
 - b. Dogs to be put on leads on request.
 - c. Dogs to be on leads at all times in designated areas.
 - d. Dog exclusion areasThis means that the 3 play areas / parks in Springwell Village come under these orders and they are :
 - Seldom Seen Park Play Area is No Dogs Allowed
 - Seldom Seen Park Area is Dogs to be kept on a lead
 - Fairhaven Play Area is No Dogs Allowed
 - Heugh Hill Play Area is Dogs to be kept on a leadChris will contact farmer on whose land mattresses have been dumped
If there are any issues / concerns with Dog Control Orders, more information can be found at www.sunderland.gov.uk/dcosmapsandareas
3. Assault on ladies walking around the village. It was confirmed that only one complaint had been made to the police and investigated. Everyone is encouraged to report any incidents immediately so that the police can take action. PACT meeting is at 6-7.30pm Wed 3rd December in the Springwell Chapel.
4. Chris Moor (NISA shop) informed the meeting that there has been increased under age drinking in the park area with alcohol being purchased by adults who are passing it on (proxy sales) Surveillance cameras are in place. **All Please inform Chris of any incidents and he will take action.**

5. Car Parking – the church roof is being repaired from Thursday 27 Nov – 3 Dec so spaces will be unavailable. Limited parking is available in the club car park.

Parking on verges – there was a complaint and advice to address the issue by simply asking owners to move vehicles.

Roundabout – the Council has confirmed the correct markings and signage have been installed. There was discontent at this response and the Committee offered to try to get a highways officer to attend the next meeting who could deal with this and illegal parking.

6. Green Belt – Hellens have confirmed they purchased the land locally known as “Gair’s land” There was a proposal from the floor that the SVRA fundamentally object to any green belt development and that its officers (ie the Committee in particular) uphold this principle in all they do. **This was carried unanimously**

Councillor Trueman confirmed that he was in no doubt of the feelings of the SVRA. He is personally against green belt development and pledged his full support. He explained that he was able to speak at any consideration of a planning application because he was not a member of the Planning Committee.

It was confirmed the SVRA would be consulted on planning applications and that the next draft of the Local Plan is due in March with a 6 week period of consultation

Suggestions for the Committee to check:

School to be designated as listed building

Playing field to be designated as Village Green

English Heritage “place of historic interest”

Committee also to check if temporary buildings constructed under “Permitted development” could ever become permanent.

7. Committee - having discussed conflicts of interest at a previous committee meeting, the Chairperson confirmed Mr and Mrs Elliott had resigned.

Ian Harris resigned because of work commitments

Kevin Curran and Stephanie Gray were proposed, seconded and appointed

8. The Chairperson informed the meeting of the new website address and email address
9. AOB – the South Tyne and Wear Waste Disposal site will be opened 10.00 am 4 December 2014.
10. There was concern that the Christmas lights were not to be lit this year – Councillor Trueman to check out.
11. Maureen Lambton was congratulated for her work on achieving the Village’s Britain in Bloom award for “Its Your Neighbourhood”
12. Next meeting Tuesday 27 January 2015 at 7.30 in Springwell Club

SPRINGWELL VILLAGE RESIDENTS ASSOCIATION – HISTORY OF OBJECTIONS TO PLANNING
APPLICATIONS ON GREENBELT LAND IN SPRINGWELL VILLAGE

For applications within the heart of Springwell Village objections were signed by individual residents and the Residents Association also submitted objections on their behalf.

Land at Usworth Hall Farm, Peareth Hall (5 Detached Dwellings)

15/01888/FUL. 229 objections

Warren Lea – application(s) for two dwellings

18/02208/FUL. 418 objections

17/00990/SUB. 449 objections

15/01635/FUL. 394 objections

For applications on the periphery of Springwell Village objections were submitted by the Residents Association

Mill House

17/00878/SUB. 25

17/00116/FUL. 20

Havannah Farm

15/02291/FUL. 11

In addition to this, a petition containing 950 signatures objecting to building on the greenbelt around Springwell Village was handed in to Sunderland City Council.