

Matter 7

**Sunderland Core Strategy and Development Management Plan Examination in Public
Response to the Inspector's Matters, Issues and Questions
Made on Behalf of Persimmon Homes (Durham) – ID 1129305**

Matter 7 – The Strategy and Housing Growth Areas for The Coalfield**Preamble**

- 7.1 This Hearing Statement is made on behalf of Persimmon Homes (Durham) (our 'Client'), in advance of making verbal representations to the Examination in Public of the Sunderland Core Strategy and Development Management Plan (CSDMP). Our Client has made comments throughout the Core Strategy consultation process, including at the Publication Draft stage.
- 7.2 Our Client has multiple land interests in land within Sunderland City Council's Authority Boundary. This Hearing Statement is specifically in reference to two of our Client's land interests, namely the existing Russell Foster Football Centre on Land west of Staddon Way, Newbottle and Land West of Mulberry Way, Houghton-le-Spring, where consideration of the Settlement Breaks are important.
- 7.3 It is important to understand that the Russell Foster Football Centre is looking to relocate to an alternative site within the Council's authority boundary during the Local Plan period, which will make the site available for development.
- 7.4 Our response to the relevant questions in Matter 7 (Coalfield) are found below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework (the 'Framework'); namely that the policies in the CSDMP are must be justified, effective, positively planned and consistent with national policy in order to be found sound. As the CSDMP was submitted to the Secretary of State by Sunderland City Council (the 'Council') prior to the transition deadline set in Annex 1 of the February 2019 Framework, we have referred back to the March 2012 Framework where appropriate within this Hearing Statement, as per the stated transitional arrangement.

Issue 1: Strategic Policies

Question 1.2 (sic) Are Policies SP6 and SS7 justified and effective?

- 7.5 Policy SP6 states that 'the Open Countryside and Settlement Breaks will be protected from inappropriate development'. There is no reason for this to be stated within Policy SP6 when both the Open Countryside (NE8) and Settlement Breaks (NE7) have their own policies in the CSDMP which both provide more detail than SP6, albeit to varying degrees.
- 7.6 There is no test as to what inappropriate development is in respect of SP6, but it clearly infers the same level of protection as would be afforded to the protection of Green Belt, as set out in paragraph 89 of the Framework which concludes the construction of new buildings as inappropriate. Settlement Breaks and the Green Belt do not serve the same functions and should not be party to the same tests.
- 7.7 This only adds a further unnecessary hurdle to navigate and assess on prospective planning applications and is subjective based on the whim of the Council. There is no justification for its inclusion in Policy SP6, which therefore means the policy is not effective and is unsound.

Issue 2: Identification of Sites and Protected Areas

Question 2.1 Do the Green Belt assessments support the HGAs in The Coalfield and demonstrate exceptional circumstances for the removal of land from the Green Belt?

- 7.8 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

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

- 7.9 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

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

- 7.10 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

Question 2.4 Are the configurations of the settlement breaks justified?

- 7.11 In the Council's Settlement Break Review – SD.48 (SBR), it sets out the purposes that Settlement Breaks are to serve. Our Client considers that the Council have assessed settlement breaks inconsistently within the SBR, which leads to proposed boundaries that are unjustified and ineffective.

- 7.12 When assessing our client's Land West of Mulberry Way, Houghton-le-Spring (Appendix E) in Section 10 of the SBR it fully takes in to account modern development to the west that has occurred post adoption of the Unitary Development Plan in 1998, and the construction of the Dubmire Link Road. This has an urbanising effect which does not form part of green infrastructure and does not serve any of the purposes of a Settlement Break. We fully support this conclusion within the SBR, and the subsequent removal of the land from the Settlement Break designation.
- 7.13 Conversely, the Council have not applied the same thought process to the Russell Foster Football Centre, west of Newbottle which is part of area 5 in Section 8 of the SBR. The urban form in this locality has significantly and demonstrably changed as recently as the last few years, with new development to the west and south west, existing development to the east and planning approval for further residential development to the immediate south approved in 2018.
- 7.14 The development north of Coaley Lane (Ref:15/00815/HYB) protrudes out into the existing Settlement Break and should now set the northern boundary of the Settlement Break running between Elba Park and Newbottle and is located to the immediate west of the Russell Foster Football Centre. The recent planning approval south of Coaley Lane (Ref:16/02357/FPA) now irrevocably connects Newbottle to the Homeland Estate. This means the Russell Foster Football Centre will have development on three sides.
- 7.15 The Russell Foster Football Centre offers no protection to the merging of settlements as the land south of Coaley Lane removes any gap, and the Council determined as part of the planning consideration that the land south of Coaley Lane 'does not resemble or act as a Settlement Break'. The Council also concluded the gap between Newbottle, and the Homeland Estate is negligible and the land south of Coaley Lane fell within an established urban area. These conclusions are also clearly applicable to the Russell Foster Football Centre to the immediate north as can be visibly seen in Appendix F.
- 7.16 The SBR also concludes the Settlement Break in this location provides a vital green infrastructure junction. Again, the Council have failed to consider the planning approval south of Coaley Lane which all but removes any element of green infrastructure running north/south. The development north of Coaley Lane sets the green infrastructure corridor running east/west. The southern part of Area 5 offers no benefit against the purposes of the Settlement Break, and this is evident when considering the Council's map on page 86 of the SBR. The football centre is clearly visible from Staddon Way and Coley Lane, and we do not consider it a form of development that would pass the criteria for development in a Settlement Break that the Council propose in policy NE7.

7.17 In consideration of the above, the Settlement Break boundary as currently proposed by the Council in this location is therefore irrational and unjustified and should be amended to reflect these changes in circumstances when assessing against the purposes of the Settlement Breaks. We recommend the new Settlement Break boundary should follow the boundary shown in Appendix F, which also visually expresses how the recent development and approvals takes away any the purpose the land would have as a Settlement Break.

Issue 3: HGA9 – Penshaw

Question 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?

Question 3.2 Are all the policy requirements within HGA9 necessary and clear to the decision maker?

Question 3.3 Is the site deliverable?

Issue 4: HGA10 – New Herrington

Question 4.1 Is the Council satisfied that the landscape, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

Question 4.2 Are all the policy requirements within HGA10 necessary and clear to the decision maker?

Question 4.3 Is the site deliverable?

Issue 5: HGA11 – Philadelphia

Question 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?

Question 5.2 Are all the policy requirements within HGA11 necessary and clear to the decision maker?

Question 5.3 Is the site deliverable?

Issue 6: Infrastructure

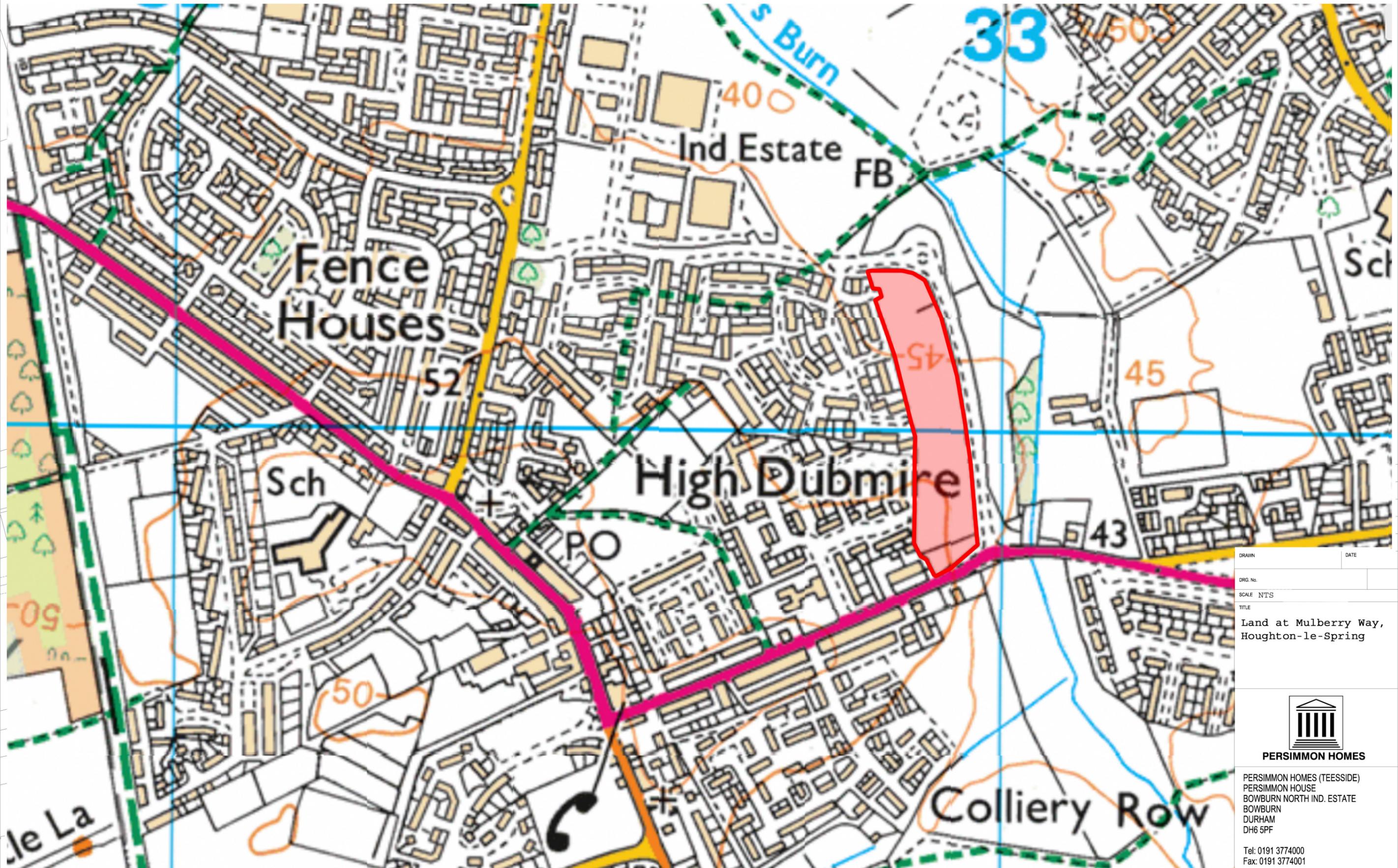
Question 6.1 Will the infrastructure to support the scale of development proposed in The Coalfield be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

Question 6.2 Are the adverse impacts of the Central Section of the Coalfield Regeneration Route capable of being mitigated?

Issue 7: Delivery

Question 7.1 Are the assumptions about the rate of delivery of houses from sites in The Coalfield realistic (anticipated delivery is shown in Appendices A, B, F and P of the SHLAA)?

7.18 Our Client does not wish to make written representations on any part of the questions unanswered above, as part of this Hearing Statement.



DRAWN _____ DATE _____

DRG. No. _____

SCALE NTS _____

TITLE _____

Land at Mulberry Way,
Houghton-le-Spring



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WRITTEN DIMENSIONS TO BE TAKEN IN
PREFERENCE TO SCALE.
ALL DIMENSIONS TO BE CHECKED ON
SITE AND ANY DISCREPANCIES
REPORTED IMMEDIATELY.



PHILADELPHIA

Success

Newbottle Conservation Area

NEWBOTTLE

Area proposed to be removed from the settlement break

Minor corridor

15/00815/HYB

16/02357/FUL

Sunniside

GRASSWELL

Key Corridor

Key Corridor

Key Corridor

Key Corridor

Herrington Burn

Herrington Burn

Elba Park

NEW LAMBTON

