



# Core Strategy and Development Plan

Report of Representations for Main  
Modifications – J, K, L, M, N, O & P

November 2019

SUNDERLAND LOAL PLAN CSDP – MAIN MODIFICATIONS CONSULTATION

REPORT OF REPRESENTATIONS – J, K, L, M, N, O & P

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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to m Jacques, S.953959, MMC236 and the  
Planning In: and  
Development Plan process.

Name..... STELLA JACQUES .....

Address.....  
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Postcode.....  
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened.  
The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this  
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Yours faithfully,

[Redacted signature]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland Council and the  
Planning Jacques, W. 1133074, MMC238  
Development Plan process.

Name..... WALTER JACQUES  
Address.....  
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Position.....

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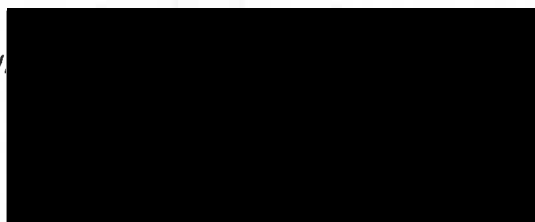
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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Public Centre  
Sunderland  
S1 7DN

I agree to my data being used by Sunderland Council and the  
Planning, P.1174513, MMC160  
Development

Name PETER JOBLING

25 OCT 2019  
October 2019

Dear Sirs

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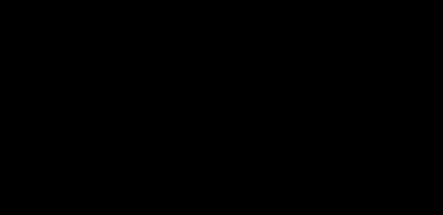
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Yours  


Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

23 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning **Johnson, C.1174161, MMC54** gy and  
Development Plan process.

Name Mrs C. Johnson

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I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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Yours faithfully,

[Redacted signature]


Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S1 2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

Johnson, G.899162, MMC235 Council and the Strategy and Development Plan process.  
Name..... GAVIN JOHNSON  


Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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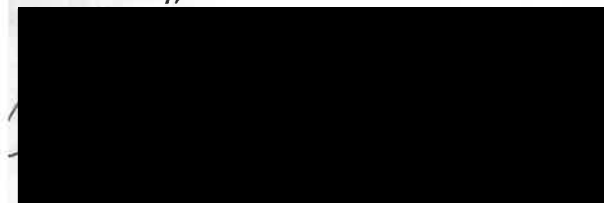
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Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
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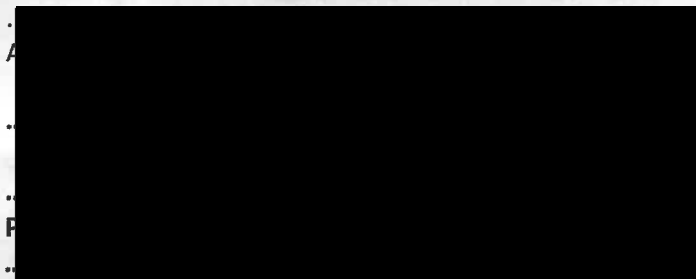
October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

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Planning Johnson, M.1119257, MMC232  
Development Plan process.

Name..... Michele Johnson .....



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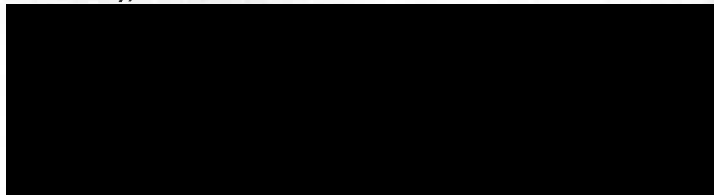
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Yours faithfully,



ior Planning Officer  
ning Strategy  
ommercial Development Directorate  
derland City Council  
c Centre  
derland  
7DN

October 2019

r Sirs

25 OCT 2019

**RE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Insp Johnson, M.1133119, MMC272 y and  
Development

Name MAVIS JOHNSON  
Ad  
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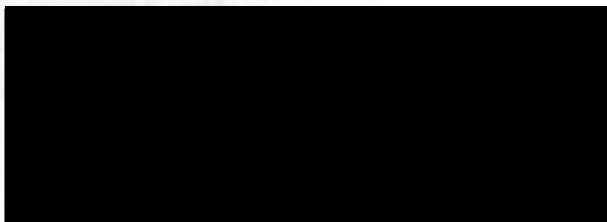
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or Planning Officer  
ning Strategy  
mercial Development Directorate  
erland City Council  
Centre  
erland  
7DN

ctober 2019

Sirs

**RE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree Johnson, R.953407, MMC267 and the  
Plannir nd  
Develo

Name ROBERT JOHNSON

Add  
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Pos  
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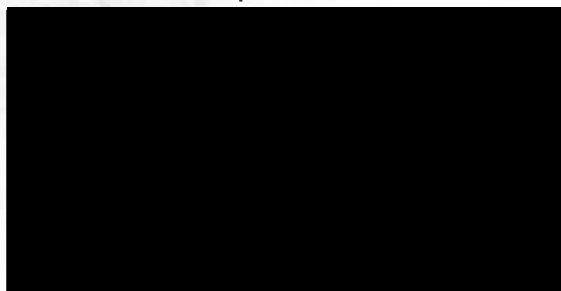
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worse.

urs faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

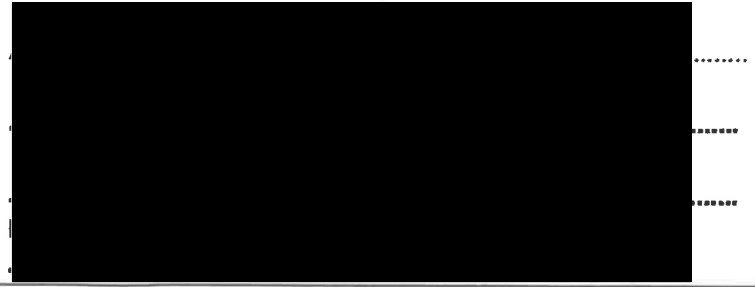
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning and Development Plan process.  
Jordison, AL.1136238, MMC22

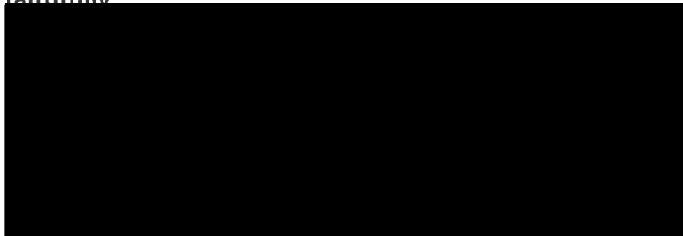
Name: Mrs A-L JORDISON



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy. Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1. The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
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- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully



JORDISON, AL.1136238, MMC

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I am writing to you on behalf of the  
Planning Inspectorate in relation to the Core Strategy and  
Development Plan process.

Name BRIAN JORDISON

Address [Redacted]  
Position [Redacted]

I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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Yours faithfully

[Redacted Signature]

JORDISON, B.1136235, MMC

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
PI Keith, A. 1137338, MMC39 gy and  
Development Plan process.

Name... Alexander Keith



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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Yours faithfully,

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

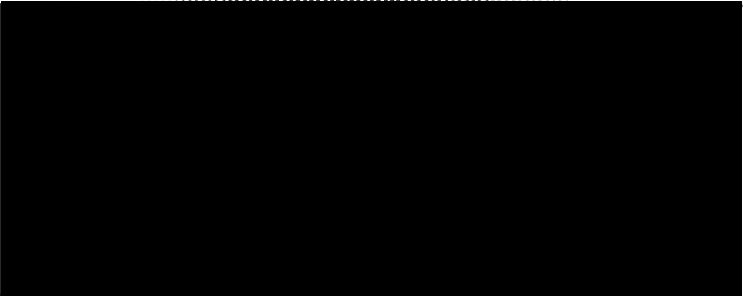
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree with the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Keith, F.1137329, MMC38 and the  
Plan and  
Development plan process.  
Name: Francesca Keith  


I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,



f. we struggle to get out of mount house drive due to how busy traffic already is passing through the village. Never mind increased traffic from construction workers and hundreds of new cars.

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to the development of the site and the  
Planning and the  
Development process.  
Name: NORAH KILROY  
Address: [REDACTED]  
Position: [REDACTED]

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.

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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,

[REDACTED]



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

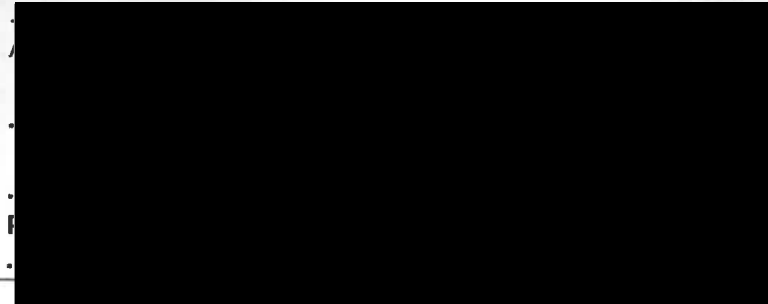
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland City Council the  
Planning  
Development  
Lambton, D.953905, MMC276

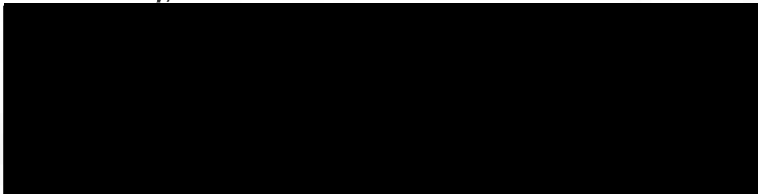
Name: DENNIS LAMBTON



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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Yours faithfully,



Senior Planning Officer 928041  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

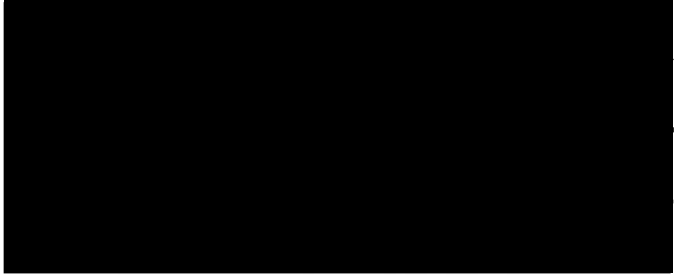
Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my d Lambton, M.928041, MMC31 and the  
Planning Inspe y and  
Development P

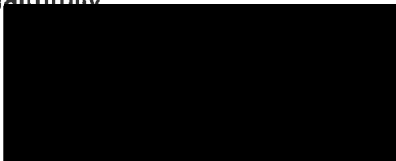
Name Maureen Lambton



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Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

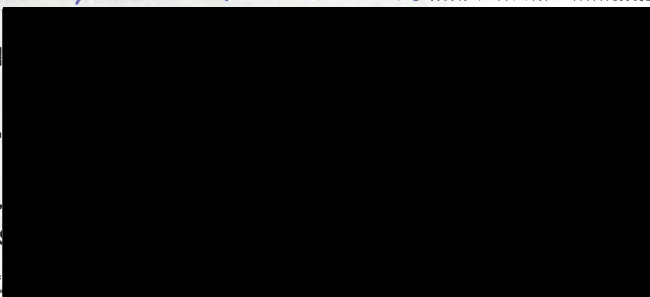
Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree Lawrence, B.1134354, MMC206 the  
Planning [redacted] the Core Strategy and  
Development Plan process.

Name..... Beth Lawrence .....

Ad.....  .....

.....  
.....  
Po.....  
.....

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell  
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened.  
The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this  
worse.

Yours faithfully  


## Comment

<b>Consultee</b>	Cllr/Mrs Anne Lawson (1228814)
<b>Email Address</b>	[REDACTED]
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Core Strategy and Development Plan - Main Modifications
<b>Comment by</b>	Cllr/Mrs Anne Lawson (1228814)
<b>Comment ID</b>	1
<b>Response Date</b>	13/10/19 19:14
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Which Main Modification does your representation relate to?

<b>MM</b>	MM12
-----------	------

<b>Do you consider that the proposed Main Modification meets the legal and procedural requirements?</b>	No
---	----

Do you consider the proposed Main Modification addresses the following issues?

<b>Positively Prepared</b>	No
----------------------------	----

<b>Justified</b>	No
------------------	----

<b>Effective</b>	No
------------------	----

<b>Consistent with National Policy</b>	No
--	----

Please give details of why the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which modification you are referring to.

1. Providing a focus on larger detached dwellings will not meet the need for social/affordable housing. There has already been a large supply of detached houses in the Coalfield area and these are taking a while to sell which begs the question 'are they needed?' 3vi Modifications in relation to HGA9 will

not protect hedgerows and wildlife. The developer has already alluded to building more than 400 houses and in their submissions give no assurance to protecting all hedgerows and trees. The modifications offer no protection 3x The councils Transport Assessment gives no assurances about traffic congestion. Access to HGA9 will cause traffic problems and access by Chislehurst Road even with junction improvements will damage hedgerows and trees

Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness identified above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

Please refer to previous Schedule of Representations by over 2000 residents from the area. HGA9 is not sound. Matter 7 of the Inspectors Post Hearing Advice states that HGA2, HGA6 and HGA7 should NOT be removed from the green belt. HGA9 similarly offers the same amenity in terms of green space to the local area. For the same reasons HGA9 needs to be reconsidered as the impact of removing it from the green belt is not likely to be acceptable. It would appear that a lot of credence has been given to professional bodies and housing developers and there has been little acknowledgement of the concerns of the local community compared to areas HGA2,6 and 9. If a football field that won't be needed can be saved (HGA6) then it seems reasonable that an area that enhances our existing parkland and heritage deserves to be treated accordingly

If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Main Modifications or any other supporting documents, please make them here.

Building 400 houses on green field in Penshaw is not sustainable. It will cause more traffic congestion in an already congested area. I note the comments made by Taylor Wimpey in relation to close proximity to local schools. In reality more housebuilding will just make accessing schools more difficult both in relation to school places and physically getting children to school. I understand the Inspector visited the area during his deliberations. May I respectfully request he visits again between 5pm and 6pm? It would be difficult to predict a day when the A19 is having one of its many problems but it just takes one regularly occurring accident to demonstrate how much worse the traffic on the A183 can be and it's impact on the existing residents of Penshaw

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

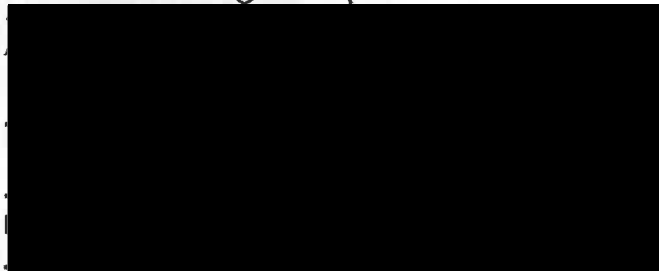
Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to **Leach, A. 1134758, MMC258** and the  
Planning and  
Development

Name Audrey Leach



Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in addition to site HGA 1 (South west Springwell Village, north of Mount Lane):

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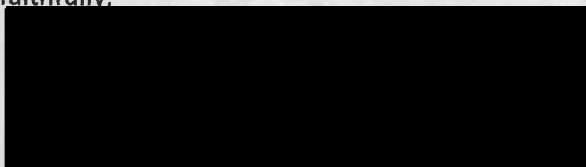
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

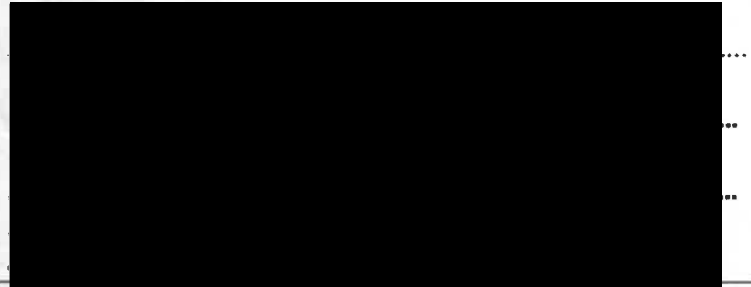
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being processed by Sunderland City Council and the  
Planning Inspectorate. Leach, D.1134756, MMC245  
Development Plan

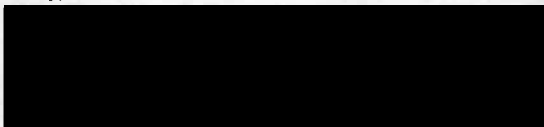
Name..... DAVE LEACH .....



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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

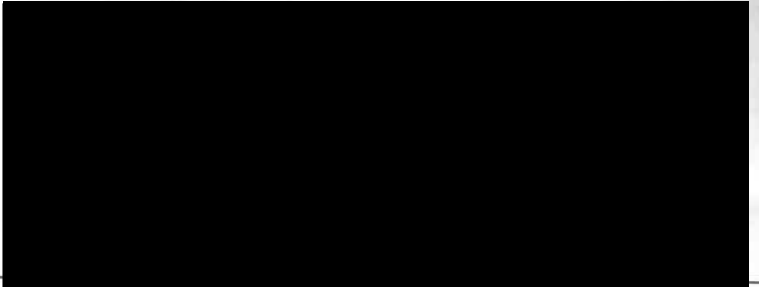
October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate. Lewins, M.950911, MMC278  
Development

Name..... M A R I A N L E W I N S .....



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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S2 7DN

October 2019

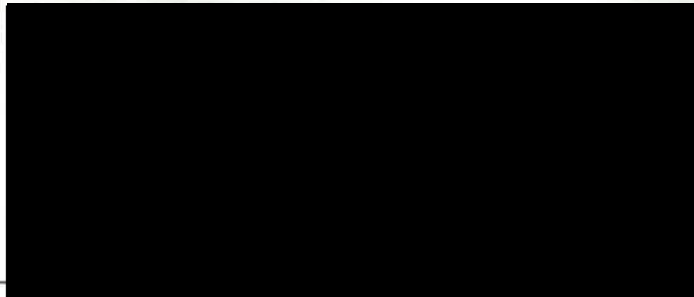
Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland City Council and the  
Plan  
Deve  
Lewins, W.1133116, MMC277  
Council and the  
ategy and

Name..... W. LEWINS



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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to [redacted] the  
Planning  
Developr

Livingstone, M.953873, MMC197

Name..... MARGARET LIVINGSTONE

Ad  
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

25 OCT 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland City Council and the  
Planning Inspectorate. Reference: Lynn, C.953937, MMC164  
Development

Name..... *CAROL LYNN* .....

Address.....  
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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland Council and the  
Planning Lynn, P.929924, MMC163  
Develop

Name..... PETER LYNN  
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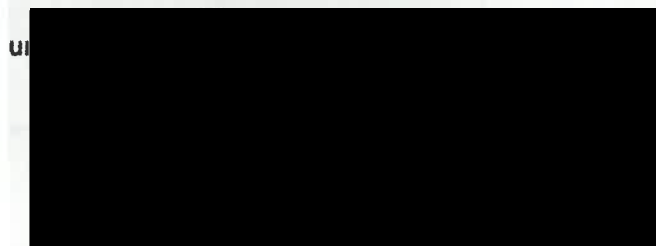
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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree Makepeace, B.1229912, MMC249 he  
Planni  
Devel

Name: B. Makepeace

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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree Makpeace, K.1229911, MMC251 Council and the  
Planning Strategy and  
Development

Name: K Makpeace

Address

.....

.....

Postcode

.....

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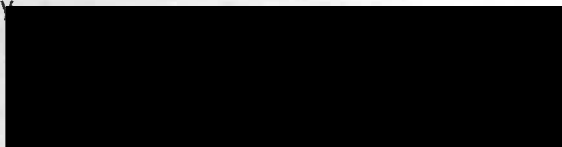
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Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning  
Development  
Makepeace, V.1229909, MMC255

Name: O. Makepeace  
Address: [REDACTED]  
Postcode: [REDACTED]

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[REDACTED]

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Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

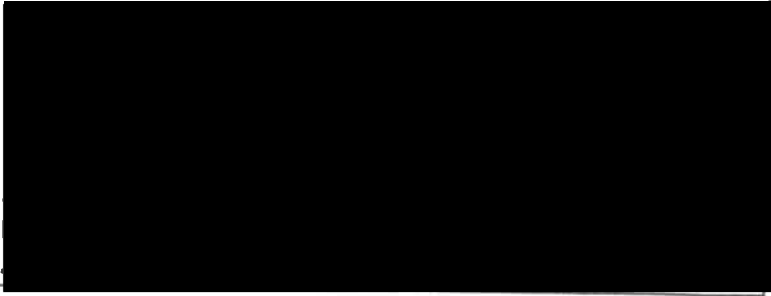
**CORE STRATEGY AND DEVELOPMENT PLAN**

1132973

25 OCT 2019

I agree to my data **Marran, P.1132973, MMC32** Council and the  
Planning Inspector **[redacted]** Policy and  
Development Plan process.

Name PAUL MARRAN



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy. Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1. The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land. CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.
- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,





Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate. McCulla, A. 1174696, MMC365  
Development Plan process.

Name ANN MCCULLA

Address 

I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell  
the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications  
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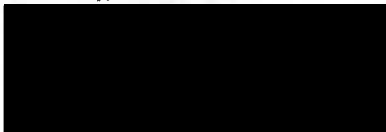
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

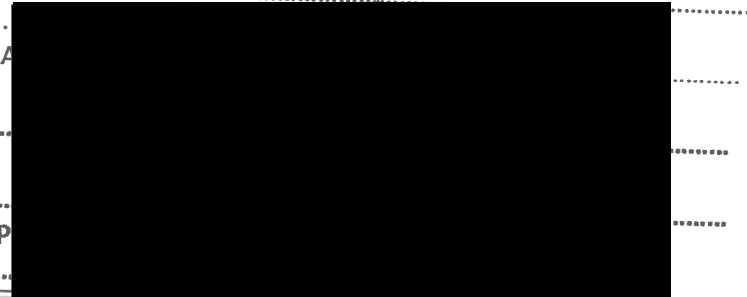
I agree **McGlen, K.953670, MMC192**

Plan

Development Plan process.

Council and the  
Strategy and

Name..... KEITH MCGLEN



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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**  
**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland City Council in the  
Planning Ins **McGlenn, M.1132977, MMC193** and the  
Development Plan process.

Name... MAUREEN MCGLENN  
Address.....  
.....  
.....  
Post.....  
.....

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Yours faithfully,

PLEASE SIGN THIS LETTER, COMPLETE THE CONTACT BOX, **McGurk, A. 1229593, MMC7** **GE COMMUNITY**  
VENUE (BY 23<sup>RD</sup> OCTOBER), or post it directly to the Council  
**EACH PERSON IN EVERY HOUSEHOLD SHOULD COMPLETE A SEPARATE LETTER. Cut to detach letter below**

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the Planning Inspectorate in relation to the Core Strategy and Development Plan process.

Name: ANDREW MCGURK

Address: [REDACTED]

Postcode: [REDACTED]

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[REDACTED]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

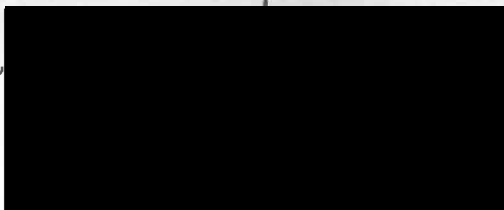
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Yours faithfully,



I agree to my data being used by Sunderland Council and the  
Planning and  
Development Plan process.

McInnes, L. 1104829, MMC8

Name: DR LYNN MCINNES

Address: [REDACTED]

Postcode: [REDACTED]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

953601

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

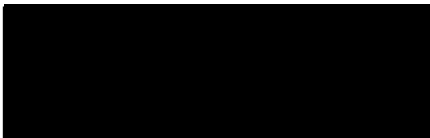
25 OCT 2019

I agree McKeon, AE.953601, MMC34 Council and the  
Plannin Strategy and  
Development Plan process.

Name Anne E McKeon  
Ad  
.....  
.....  
Pos  
.....

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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

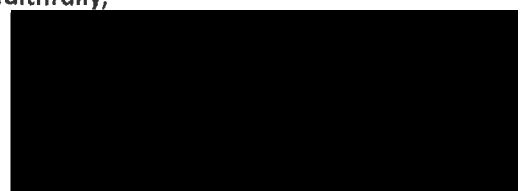
953602

Tag: McKeon, J.953602, MMC33 and the  
Plan: ..... and  
Dev: .....  
Name: James McKeon .....  
Ad: .....  
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Pos: .....  
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Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

October 2019

Dear Sirs

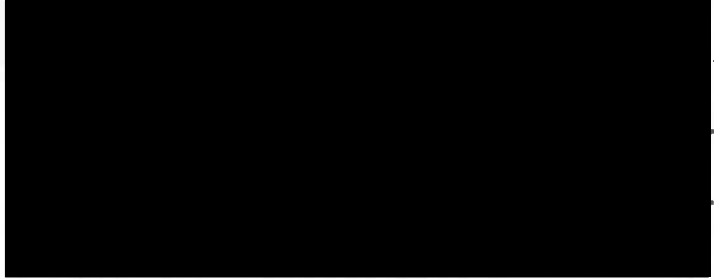
25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the

Planning  
Development  
McKeon, W.953375, MMC284

Name: Nendy McKeon



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Yours faithfully





Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I am McMahon, G.1175153, MMC358 of Council and the Planning Strategy and Development Plan process.

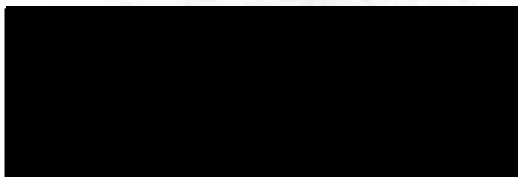
Name G. McMahon

Address  
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.....  
Postal Code  
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- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land. CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.
- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Sunderland  
2 7DN

October 2019

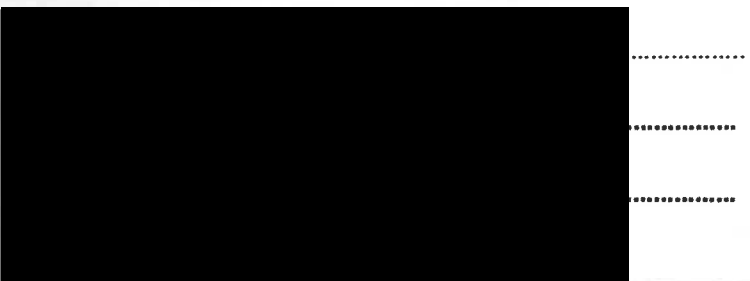
Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate. My name is Catherine Meek, C.953764, MMC271  
Development

Name Catherine Meek



Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.

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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate. Meek, D.953766, MMC330  
Development Plan process.

Name..... DAVID MEEK .....

.....

.....

.....

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.

**Public Transport:** The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy.

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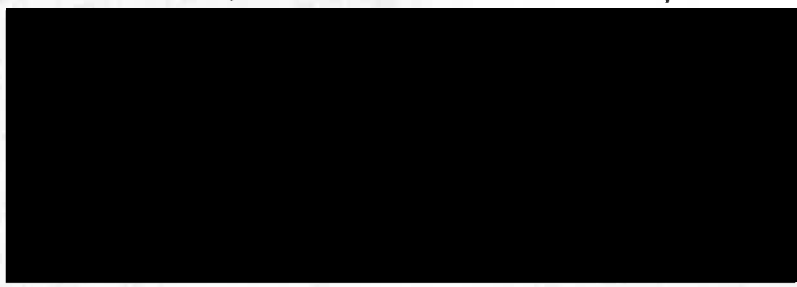
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to Meek, I.1229878, MMC367 Council and the  
Planning Policy and the Strategy and  
Development Plan process.

Name..... IAN MEEK



Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell in the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.

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Yours faithfully,

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

## CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my details being held by Sunderland City Council and the  
Planning Department for the purpose of processing my application and  
Development Control

Metcalf, I.953786, MMC323

Name: Mrs J Metcalf

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.

**Public Transport:** The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy.

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The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land.

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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the [redacted] area coupled with more houses can only make this worse.

Yours faithfully,

Mrs Metcalf is 98 with failing sight & apologises for her signature.

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 2 7DN

October 2019

Dear Sirs

## CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the  
Planning Ins Miller, G.1133263, MMC9 egypt and  
Development Plan process.

Name.....

Graeme Miller

Address.....

Postcode.....

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell  
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Political developments and further uncertainty since the production of the Core Strategy and Development Plan,  
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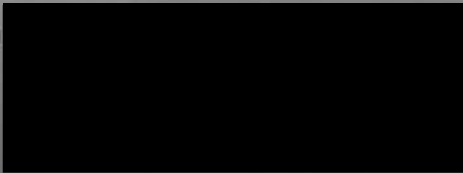
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The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this  
worse.

Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Miller, G. 1174153, MMC47 tegy and  
Development Plan process.

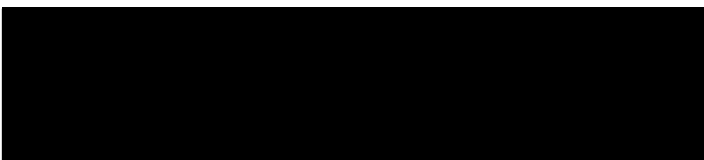
Name... W. G. MILLER .....



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to make Miller, J.1119373, MMC310 Council and the  
Planning Inspectorate Strategy and  
Development Plan process.

Name..... Joan Miller.....

Address.....

.....

.....

Position.....

.....

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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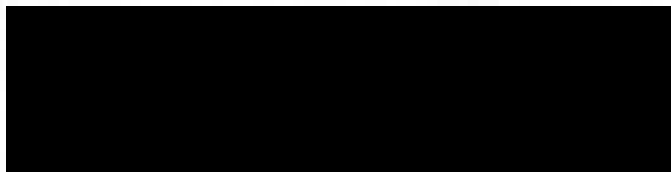
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Yours faithfully,





Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

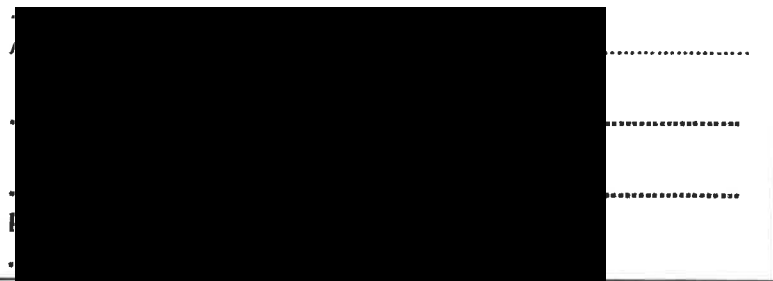
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to **Miller, L. 1174158, MMC46** and the  
Planning **\_\_\_\_\_** y and  
Development Plan process.

Name Mrs L Miller.....



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
SR1 7DN

October 2019

Dear Sirs

## GREEN BELT STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the  
Planning Department for the Green Belt Strategy and  
Development Plan process.

Miller, S.928436, MMC10

Name.....

Susanne Miller

Address.....  
.....  
.....  
.....  
.....

Postcode.....  
.....

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell  
the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications  
the CSDP reflecting these recommendations. However there are a number of comments I would like to make in  
relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

Political developments and further uncertainty since the production of the Core Strategy and Development Plan,  
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**Public Transport:** The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is  
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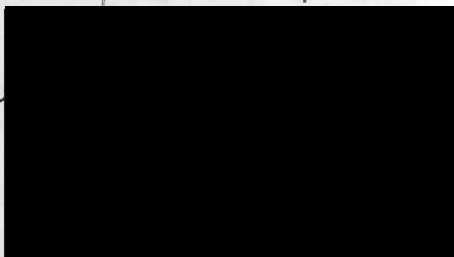
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened.  
The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this  
worse.

Yours faithfully



25 October 2019

Strategic Plans  
Civic Centre  
Burdon Road  
Sunderland  
SR2 7DN

SENT BY EMAIL

[planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk)

Dear Sir/Madam

#### **CORE STRATEGY AND DEVELOPMENT PLAN: MAIN MODIFCATIONS**

Hedley Planning Services are instructed by Miller Homes in support of Land at New Herrington, Sunderland. The site was considered in the *Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)* as Site Ref. H03 and within the *Strategic Housing Land Availability Assessment (2018) (SD.22)* as part of Site Ref. 466.

We welcome the opportunity to comment on the following proposed Main Modifications as set out in the Schedule (Ref. EX19.001):

#### **MM3: Policy SP1**

Miller Homes support the amendment to include 'net' and 'net additional', this is considered to add clarity to the policy, especially in the context of the net dwellings figure not being seen as a 'ceiling', but rather the level of growth which is both needed and anticipated to take place over the Plan period.

It is also noted that an additional paragraph has been added in relation to 'Safeguarded Land', to ensure a degree of permanence to the Green Belt boundaries in the longer term. As set out in relation to MM6 (see below), the deletion of proposed safeguarded sites means that the plan now how a deficiency in that regard and additional safeguarded sites should be proposed.

Furthermore, in relation to the Council's remaining Safeguarded Land allocation, there is a concern that if land needs to be brought forward to address a lack of a five year housing land supply, a large site is not the best way of quickly delivering needed homes.

A more dispersed strategy, including sites within The Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfields.

### **MM6: Policy SS3**

The Council's response to the Inspector's Post Hearing Advice (Ref. EX18.003) only considers the impact of the loss of 370 dwellings on the five-year-supply position and does not address the requirement of paragraph 139 c) of the NPPF, which requires consideration of Safeguarded Land. The removal of proposed allocations of both housing sites and Safeguarded Land from the Plan means that alternative Safeguarded Land is required, based on the Council's own evidence of need.

The SA Report Addendum (Ref. EX19.002) does not consider impact of a lack of safeguarded land. As set out in the Council's Sustainability Appraisal (Ref. SD.5):

*"The NPPF requires that where defining Green Belt boundaries, where necessary, SCC should identify areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period.*

*A reasonable alternative was considered under which SCC would not identify any safeguarded land. However, due to limited land supply within the urban area and the need to revise Green Belt boundaries as part of this plan, it was considered prudent to identify a future area for growth at this stage and remove this from the Green Belt boundary now, to reduce the likelihood of needing to undertake another Green Belt Review as part of the next plan. Changing the status of land from Green Belt to 'safeguarded land' would however have not substantive effects, as this would not itself provide support for permanent development of the land until a future review of the Sunderland CSDP determines that the safeguarded land should be released for development."* (Appendix F, Table 2.3).

There also remains a concern that if land needs to be brought forward to address a lack of a five year housing land supply, a large site is not the best way of quickly delivering needed homes.

A more dispersed strategy, including sites within The Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfields.

### **MM11: Policy SP6**

Miller Homes supports the deletion of 'from inappropriate development' from Policy SP6.

Furthermore, the 'Exceptional Circumstances in the Coalfield' justifications are equally applicable to the New Herrington site being promoted by Miller Homes.

Given the proposed deletion of proposed allocations of both housing sites, that could accommodate 370 dwellings, and Safeguarded Land from the Plan means that alternative Safeguarded Land is required, based on the Council's own evidence of need. The Council's own evidence justifies additional Green Belt release sites, including New Herrington, including as safeguarding sites.

#### **MM14: Policy SP8**

Miller Homes support the amendment to include 'net', this is considered to add clarity to the policy. The inclusion of a reference to the Housing Implementation Strategy is also supported.

#### **MM15: Policy H1**

Miller Homes do not consider that MM15 is sound, and continue to contend that the Council has not provided sufficient evidence to demonstrate that the policy is needed, and therefore it is not considered to be consistent with national policy. Miller Homes still consider that part (iv) of the policy should be deleted.

If the policy, is to be retained we acknowledge the addition of a transition period, and the recognition within the justification that for some schemes this requirement may not be viable.

#### **MM16: Policy H2**

Miller Homes do not consider MM16 to be sound and we still have concerns in relation to the viability of the requirements of this policy. The inclusion of the final sentence in relation to viability is acknowledged; however, it still is not entirely clear whether this actually provides any flexibility to the requirement or whether it would help to deliver any more homes.

Miller Homes do support the addition of text to paragraph 6.18 which states that other evidence will be considered in relation to the housing mix and the amendment to paragraph 6.21 in relation to the distribution of affordable housing within a development.

#### **MM21: Policy BH1**

Miller Homes do not consider that amendment MM21 is sound. The Council do not have sufficient evidence to introduce this policy in relation to the NDSS and it should be deleted. If the policy is to be retained, we support the addition of a transition period to part 14 of the policy.

### **MM27: Policy NE3**

Miller Homes supports the amendments to Policy NE3, which is considered to ensure that the policy work more effectively.

### **MM38: Monitoring Section**

Miller Homes supports the acknowledgement that the successful implementation of the Local Plan relies on coherent, robust and flexible monitoring process which will enable the Council to respond to changing circumstances.

However, a lack of safeguarded land means more likely that a Plan Review is required, especially as only one, large site safeguarded site is proposed for allocation, which will take a significant amount of time to come forward. Furthermore, given the proposed deletion of housing sites to accommodate 370 dwellings, the Council's own evidence justifies additional Green Belt release sites, including New Herrington, including as safeguarding sites.

### **MM40: Monitoring Framework**

In relation to Policy SS7 it is considered that there is a need to include "Housing delivery (net additions) against the plan period requirements of average 745pa net additions" as a monitoring indicator (as with all Housing Growth Areas). This will improve the effectiveness of the Plan.

I trust that the Council will find these comments useful as it continues to progress its Local Plan. Please can we be kept informed of the publication of the Inspector's report and the adoption of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely



**Joe Ridgeon**

Director

BA (Hons) MSc MRTPI





R & K Wood Planning LLP

1 Meadowfield Court  
Meadowfield Industrial Estate  
Ponteland  
Newcastle Upon Tyne  
NE20 9SD

01661 825008

[info@r-kwoodplanning.co.uk](mailto:info@r-kwoodplanning.co.uk)

Our ref: RW/JF

Date: 24<sup>th</sup> October 2019

Strategic Plans Team  
Sunderland City Council  
Sunderland Civic Centre  
Sunderland  
SR2 7DN

Dear Sir or Madam

**Sunderland Core Strategy and Development Plan – Proposed Main  
Modifications Consultation**  
**Comments submitted by R&K Wood Planning LLP on behalf of Mr Clive Milner**

I refer to the consultation for the Sunderland Core Strategy and Development Plan – Proposed Main Modification Consultation that was issued on Friday 13<sup>th</sup> September 2019.

You will be receiving representations from Barratt David Wilson Homes (North East) in relation to the site known as Washington Meadows. I represent the landowner of part of this site, Mr Clive Milner, and on behalf of my client I would like to underline our support for these representations. In short, my client welcomes the fact his land is safeguarded for future development, but in line with the representations submitted by Barratt David Wilson Homes believes that there is a strong case of the site being allocated for housing within this Core Strategy

In addition, I would also like to support the amendment to the Green Belt boundary at Severn Houses as one of the Main Modifications to the plan as set out in the Main Modifications Note (EX19.005). This new boundary to the Green Belt will reflect the alignment of the new A1290 and provides a robust and defined boundary to the safeguarded land.

Yours sincerely

A handwritten signature in black ink that reads 'Katie Wood'.

Katie Wood

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

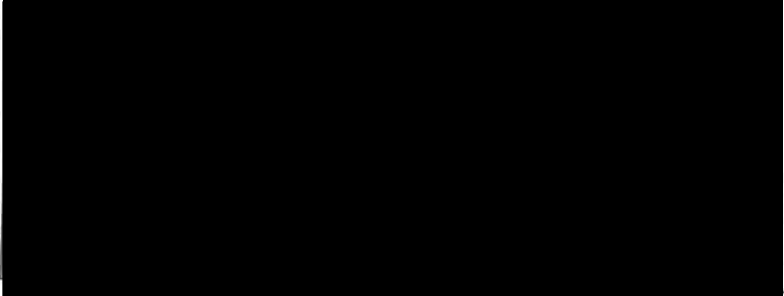
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my **Monaghan, M.1134157, MMC36**  
Planning Insp  
Development Plan process.

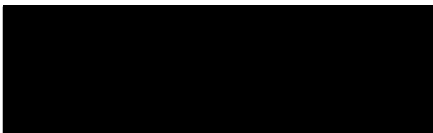
Name.. MRS. MAUREEN MONAGHAN



I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy. Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1. The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land. CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.
- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,





Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

l agr  
Plan  
Deve

Monaghan,R.1134167,MMC37

Name... MR & MRS RONALD MONAGHAN

A

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Pe

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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to the data being used by Sunderland Council and the  
Planning Department  
Development

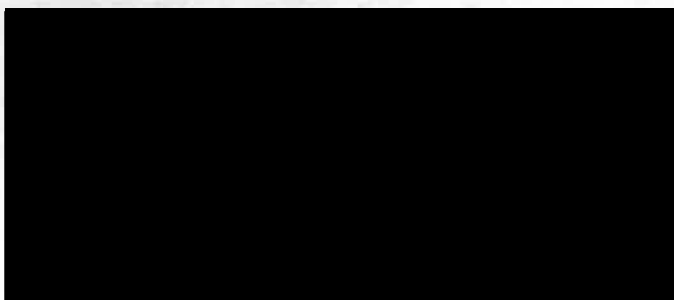
Murison, C.1113715, MMC230

Name..... COLIN MURISON  
Address.....  
.....  
.....  
Post.....

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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

October 2019

Dear Sirs

25 OCT 2019

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to [redacted] and the  
Planning [redacted] and  
Development plan process.

Name E. MURISON

Address [redacted]

Postcode [redacted]

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Yours faithfully,

[redacted signature]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S2 7DN

25 OCT 2019

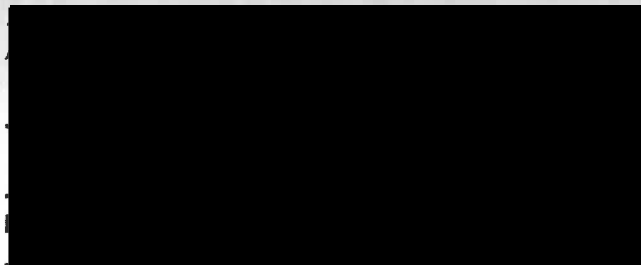
October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Myers, E.1134388, MMC219 and  
Development Plan process.

Name..... ELIZABETH MYERS .....



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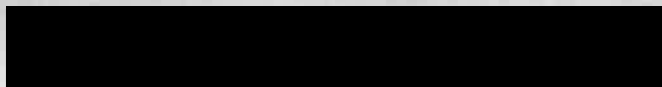
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Service Centre  
Sunderland  
S2 7DN

25 OCT 2019

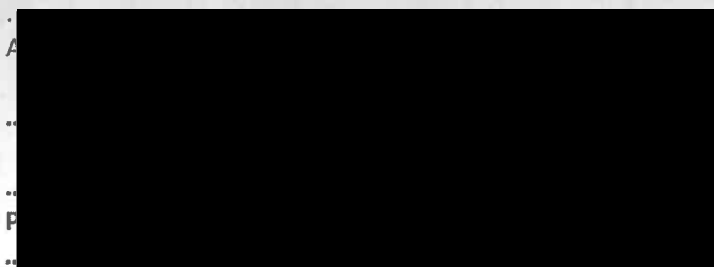
October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree Myers, G.1134396, MMC220 and the  
Plan and  
Development Plan process.

Name..... GEORGE MYERS .....



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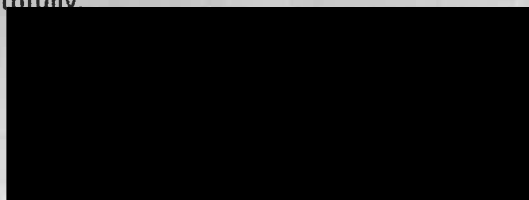
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Yours faithfully



Strategic Plans and Housing Team  
Civic Centre  
Burdon Road  
Sunderland  
SR2 7DN

Lucy Bartley  
Consultant Town Planner



Sent by email to:  
[Planningpolicy@sunderland.gov.uk](mailto:Planningpolicy@sunderland.gov.uk)

24 October 2019

Dear Sir / Madam

**Sunderland Council: Core Strategy Main Modifications  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

**About National Grid**

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.

National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect National Grid's assets.

**Proposed sites crossed or in close proximity to National Grid infrastructure:**

Following a review of the above development plan, the following sites have been identified as being crossed or in close proximity to National Grid infrastructure. Further details are provided in the table overleaf.



## Electricity Transmission:

Site Ref	Asset Details	Appendix Ref
PEA4 Pattinson North	<b>ZZA Route</b> - 400Kv two circuit route from West Boldon substation in South Tyneside to Hawthorn Pit substation in Durham	ET222
PEA8 Nissan	<b>ZZA Route</b> - 400Kv two circuit route from West Boldon substation in South Tyneside to Hawthorn Pit substation in Durham	ET222
PEA10 Hillthorn Farm	<b>ZZA Route</b> - 400Kv two circuit route from West Boldon substation in South Tyneside to Hawthorn Pit substation in Durham	ET222

Please see enclosed plan referenced ET222 at Appendix 2. The proposed sites are crossed by a National Grid high voltage electricity transmission overhead line.

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. You can find National Grid's guidelines for developing near Over Head Lines here: [https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines\\_0.pdf](https://www.nationalgrid.com/sites/default/files/documents/Development%20near%20overhead%20lines_0.pdf)

## Electricity Distribution

Northern Powergrid owns and operates the local electricity distribution network in Sunderland Council. Contact details can be found at [www.energynetworks.org.uk](http://www.energynetworks.org.uk).

## National Grid Asset Guidance

National Grid seeks to encourage high quality and well-planned development in the vicinity of its high voltage overhead lines. Land beneath and adjacent to the overhead line route should be used to make a positive contribution to the development of the site and can for example be used for nature conservation, open space, landscaping areas or used as a parking court. National Grid, in association with David Lock Associates has produced 'A Sense of Place' guidelines, which provide detail on how to develop near overhead lines and offers practical solutions which can assist in avoiding the unnecessary sterilisation of land in the vicinity of high voltage overhead lines.

Potential developers of these sites should be aware that it is National Grid policy to retain our existing overhead lines in-situ. The relocation of existing high voltage overhead lines will only be considered for projects of national importance which has been identified as such by central government.

National Grid requests that any High-Pressure Gas Pipelines are taken into account when site options are developed in more detail. These pipelines form an essential part of the national gas transmission system and National Grid's approach is always to seek to leave our existing transmission pipelines in situ. Please refer to the Health and Safety Executive (HSE) in the first instance.

National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid easement strip, and a deed of consent is required for any crossing of the easement. In the first instance please consider checking with the Land Registry for the development area.

If you require any further information in relation to the above and/or if you would like to check if National Grid's transmission networks may be affected by your works, please contact National Grid's Plant Protection team via [plantprotection@nationalgrid.com](mailto:plantprotection@nationalgrid.com) or visit the website: <https://www.linesearchbeforeudig.co.uk/>

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. In addition, the following publications are available from the National Grid website or by contacting us at the address overleaf:

- A sense of place – design guidelines for development near high voltage overhead lines: A sense of place design guidelines for development near high voltage overhead lines: <https://www.nationalgridet.com/document/130626/download>
- Guidelines when working near NGG assets: <https://www.nationalgridgas.com/land-and-assets/working-near-our-assets>
- Guidelines when working near NGETT assets: <https://www.nationalgridet.com/network-and-assets/working-near-our-assets>

**Appendices - National Grid Assets**

Please find attached in:

- Appendix 1 provides a map of the National Grid network across the UK.
- Appendix 2 provides maps of the sites referenced above in relation to the affected National Grid Transmission assets outlined above.

Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Lucy Bartley  
Consultant Town Planner

Spencer Jefferies  
Development Liaison Officer, National Grid

[Redacted contact details for Lucy Bartley]

[Redacted contact details for Spencer Jefferies]



██████████

██████████

I hope the above information is useful. If you require any further information, please do not hesitate to contact me.

Yours faithfully

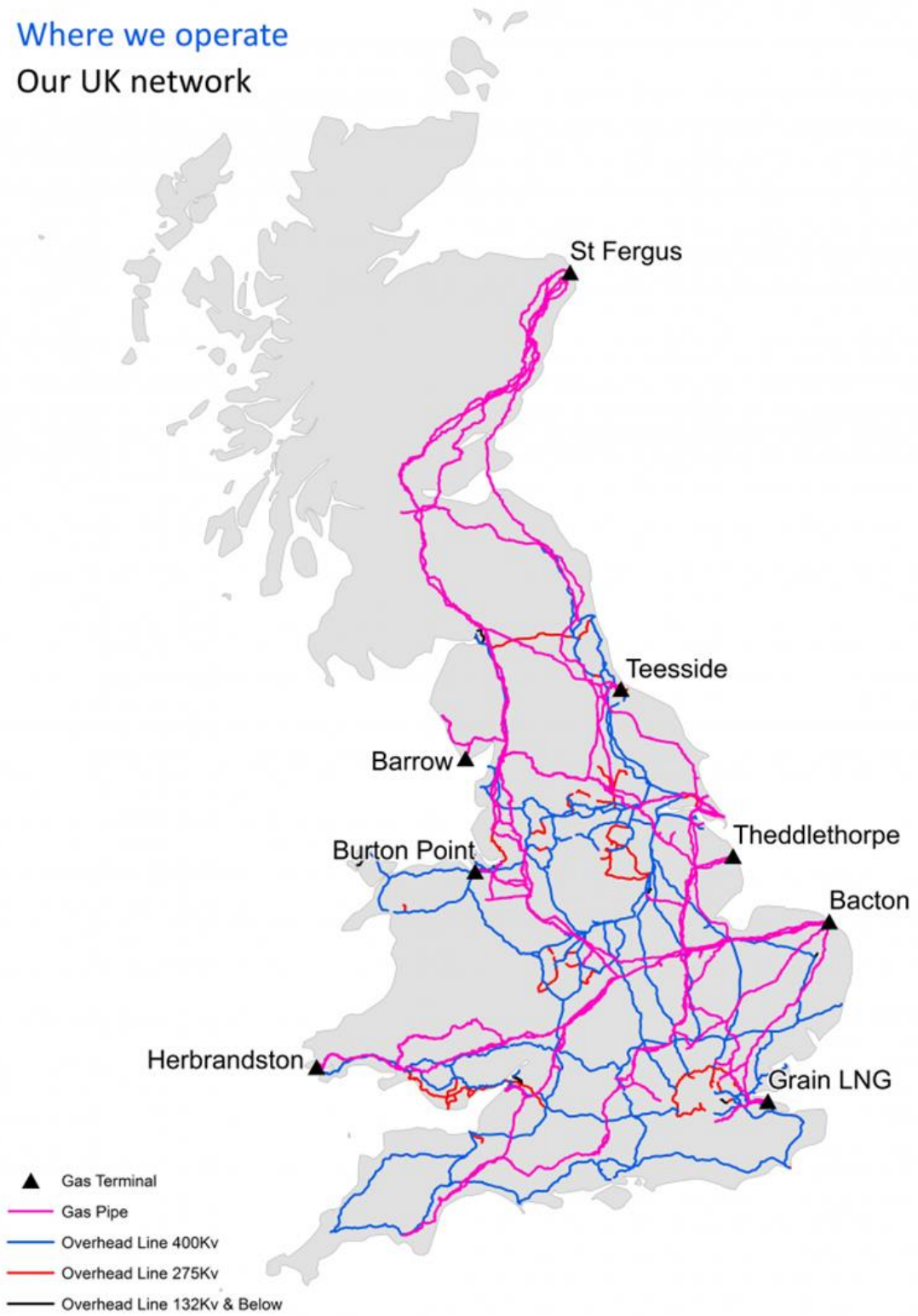
[via email]

**Lucy Bartley**  
**Consultant Town Planner**

cc. Spencer Jefferies, National Grid

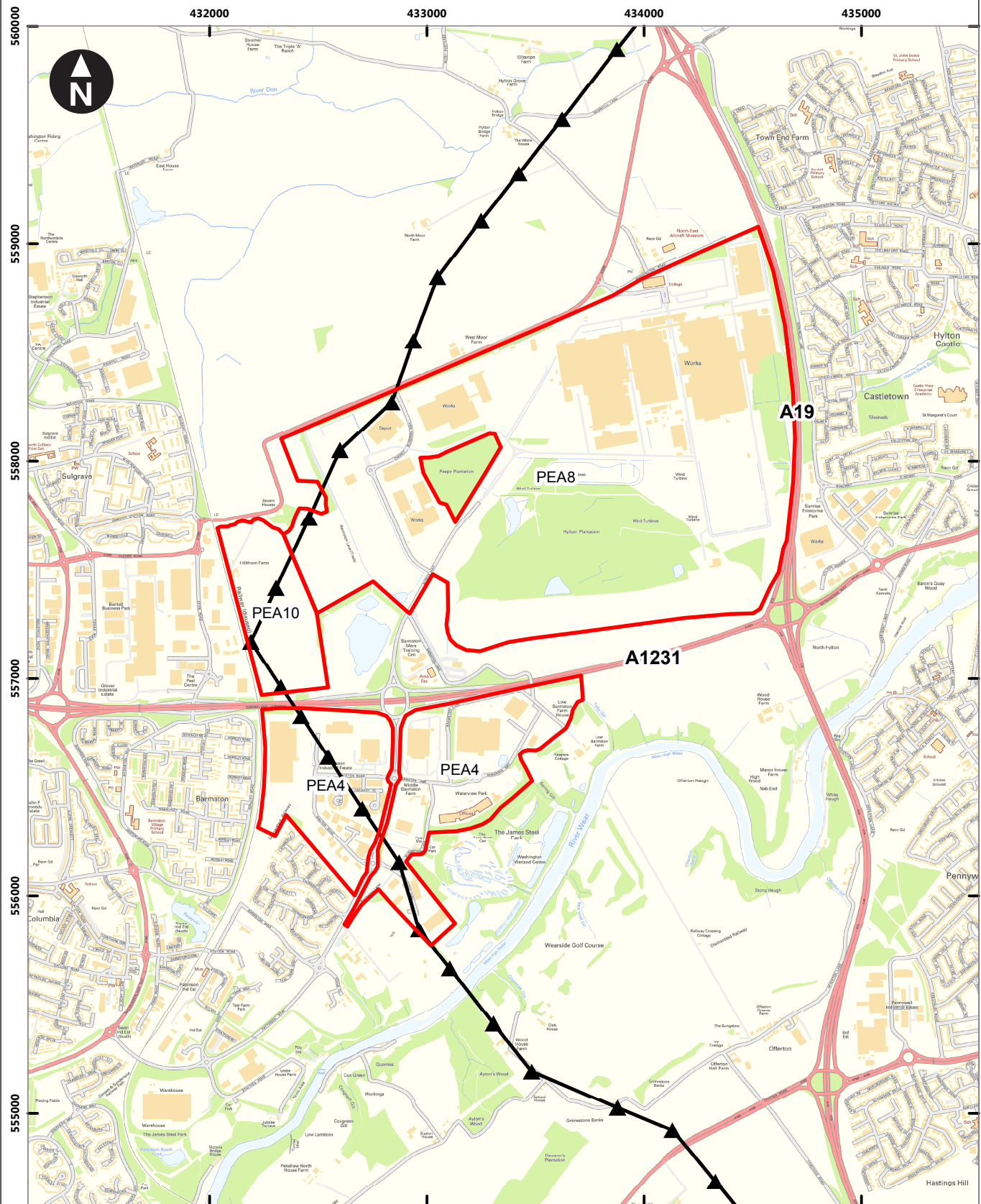
**APPENDIX 1: NATIONAL GRID'S UK NETWORK**

Where we operate  
Our UK network

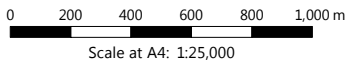


**APPENDIX 2: NATIONAL GRID TRANSMISSION ASSETS**

H:\Projects\36791 - National Grid Development Plan Monitoring\5 Design\Drawings\GIS\Figures\36791\_Lea376\_Site ET222.mxd Originator: vicki.smith



- Key
- Indicative site boundary
  - Tower
  - Overhead line



Development Plan Monitoring

**National Grid Reference:**  
**Site ET222**  
**Sunderland City Council**  
**Proposed Development Site**  
**Employment**



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

953587

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my d... and the  
Planning Inspectorate in relation to the Core Strategy and  
Development Plan process.

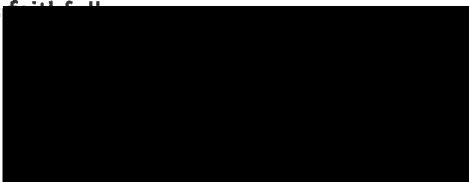
Name... *C Nelson*



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- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
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- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

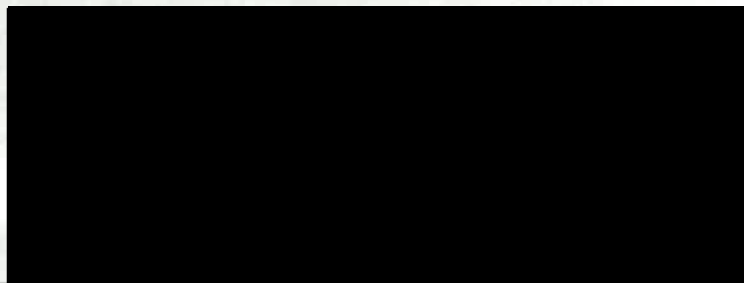
Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate  
Development Plan process.

Nelson, D.953200, MMC279

Name DIANE NELSON



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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

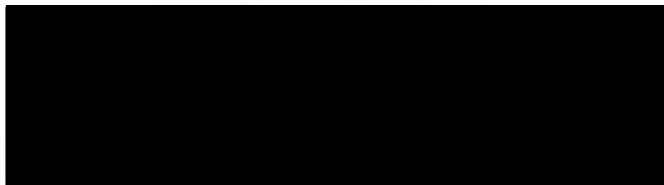
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Yours faithfully,



I agree to my data being used by Sunderland Council and the  
Plan Nelson, I.954715, MMC282 y and  
Deve

Name... T Nelson



25 OCT 2019



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

## CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the Planning Inspectorate  
Nelson, J.953198, MMC288  
Development Plan process.

Name JEFFREY NELSON

Address

.....

.....

Postcode

.....

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Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

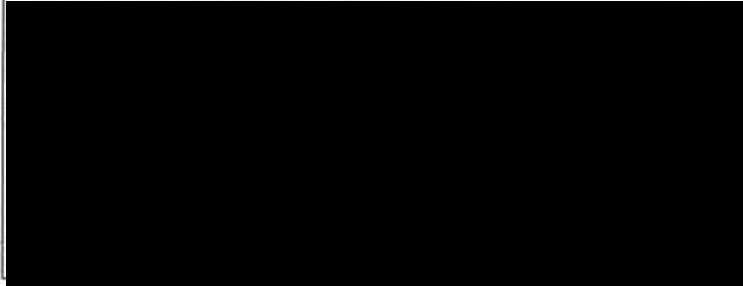
25 OCT 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Plan Nelson, P.954712, MMC283 and  
Development Plan process.

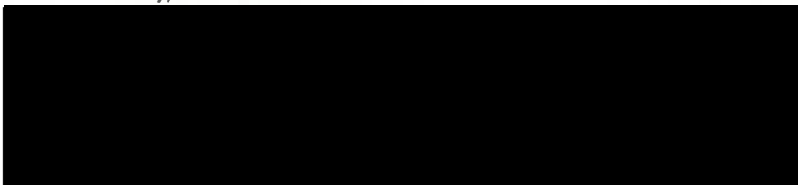
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

October 2019

Dear Sirs

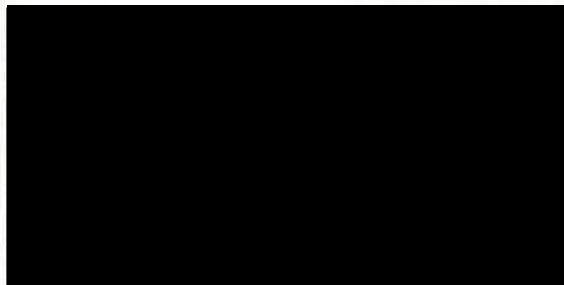
**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland Council and the  
Planning Department for the Core Strategy and  
Development Plan process.

Nesbitt, J.953829, MMC261

Name..... JOHN NESBITT



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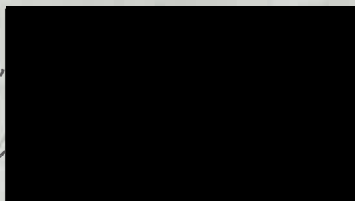
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worse.

Yours faithfully,



19-10-19

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**GREEN BELT STRATEGY AND DEVELOPMENT PLAN**

I agree to the publication of this document by the Council and the Planning and Development Committee in the Green Belt Strategy and Development Plan process.

Nesbitt, J. 1135194, MMC316

Name..... JORDAN NESBITT

Address.....  
.....  
.....  
Postcode.....  
.....

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Yours faithfully,

[Redacted signature]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my details being held by the Council and the  
Planning Inspectorate and the  
Development Management Team  
Nesbitt, S.1120308, MMC319

Name: SCOTT NESBITT

Address: [REDACTED]  
[REDACTED]  
[REDACTED]  
Postcode: [REDACTED]  
[REDACTED]

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Yours faithfully,

[REDACTED SIGNATURE]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S2 7DN

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to the recommendations of the Council and the  
Planning Committee. Oliver, E.953217, MMC250  
Development Plan process.

Name Elizabeth Oliver

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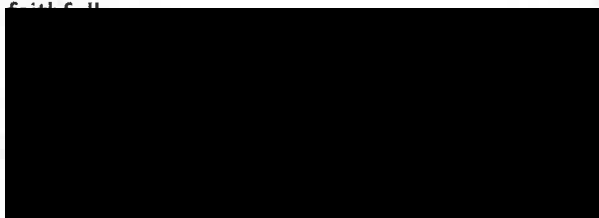
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Yours faithfully



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my details being used for the purposes of the  
Plann Oliver, E.954705, MMC297  
Devel

Name..... E OLIVER .....

Add .....

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Post .....

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[Redacted signature]

[Redacted footer]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning and Development Department  
Oliver, GM.954707, MMC300

Name..... G.M. OLIVER.....

Address.....  
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Position.....

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Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

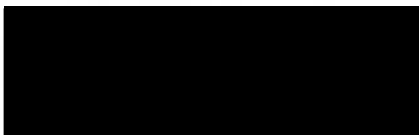
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**CORE STRATEGY AND DEVELOPMENT PLAN**

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I agree Oliver, S.953214, MMC331 and the  
Planr y and  
Deve

Name Stephen Oliver



25 OCT 2019

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

**GREEN BELT STRATEGY AND DEVELOPMENT PLAN**

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Pl  
De  
Pattison, ED.1132695, MMC355  
Council and the  
Strategy and

Name MRS E. D. PATTISON

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[Redacted signature]

ior Planning Officer  
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nmercial Development Directorate  
derland City Council  
c Centre  
derland  
7DN

25 OCT 2019

October 2019

r Sirs

**RE STRATEGY AND DEVELOPMENT PLAN**

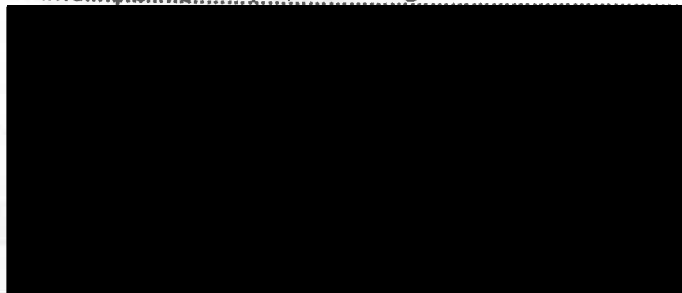
I agree **Pattison, WA.953901, MMC229**

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Development Plan process.

Name MR. W. A. PATTISON.



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# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form



# Proposed Main Modifications Consultation Comment Form

**Please use this form if you intend to make a representation in response to the consultation on the proposed Main Modifications to the Sunderland Core Strategy and Development Plan (CSDP).**

**If your comments relate to more than one Main Modification you will need to complete a separate form for each representation.**

Following the submission of the Publication Draft CSDP for independent Examination to the Secretary of State in December 2018, a number of public hearing sessions were held between Tuesday 21 May 2019 and Thursday 13 June 2019. In response to issues raised during the hearing sessions, as well as representations made to the publication draft CSDP (Regulation 19) and taking into account the independent Planning Inspector's 'Post Hearing Advice – Main Modification and Related Matters' report (EX18.002) published in July 2019, the Council are undertaking a consultation on a number of proposed Main Modifications.

These modifications are set out in the Schedule of Main Modifications which is the focal point for this consultation. These are changes considered necessary by the Planning Inspector to make the plan sound. In support of the Main Modifications, a number of supplementary documents have also been published, including an Addendum to the Sustainability Appraisal.

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It should be noted that the Council has also prepared a Schedule of Additional Modifications. This sets changes which are minor in nature (such as typographical and factual errors and updates). These are not subject to consultation but are published for information only. The consultation only concerns proposed Main Modifications and the supporting Sustainability Appraisal Addendum and not other aspects of the plan.

**The period for making representations runs for six weeks between Friday 13 September 2019 to Friday 4.45pm 25 October 2019. Representations received after this deadline will not be accepted.**

Representations should only relate to the legal compliance and/or the soundness of the Proposed Main Modifications and made within the six-week period. Representations relating to other parts of the Plan will not be considered.

Please note that you should include all information, evidence and supporting information which is required to support your representation and any suggested changes.

All comments that relate to the Main Modifications and which are received within the consultation period (as set out above) will be considered by the appointed Planning Inspector as part of the Examination.

## The Form of Schedule of Proposed Main Modifications

All policy numbers, paragraph numbers and figure numbers set out in the Schedule of Proposed Main Modifications relate to the Sunderland Core Strategy and Development Plan Consultation Publication Draft (SD.1).

This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategy priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Legal compliance with regards to plan making generally refers to the Core Strategy and Development Plan meeting legal requirements under Section 20 (5) of the 2004 Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations, 2012.

It is important that you fill in your contact details below. **We cannot register your representation without your personal details.**

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name, organisation (if relevant) and comments may be made available to the public, in Council committee papers or as otherwise considered appropriate by us. Your personal data i.e. postal addresses, emails and telephone numbers **will not** be shared with the public.

However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

### 1. Your Details

	Your details	Agent details (if applicable)
Name		Ian Lyle
Organisation/Group	Paul Mackings Consulting Ltd	ELG Planning
Address Line 1	[REDACTED]	[REDACTED]
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

### 2. Which Main Modification does your representation relate to?

Main Modification Reference	MM
MM41 MM2 MM9 MM19	Policies Map Key Diagram Key Diagram South Sunderland EG2

### 3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

Yes       No

### 4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Justified	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Effective	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Consistent with National Policy	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.**

My client would support the Main Modifications listed above which seek to give effect to the recommendation in the Inspector's Post Hearing Advice July 2019 ( Ref EX18.002) as detailed below:

'Matter 6 – Employment Land Supply

Issue 2 – Key Employment Areas

6. As indicated under Matter 2 the long-term protection of the full extent of the Key Employment Areas in South Sunderland is not justified taking into account the Employment Land Review documents (SD.37 and SD.38), the overall supply of employment land against the minimum requirement of 95 ha4 and the prospect of parts of the Key Employment Areas being used for employment purposes. It is recommended that the Key Employment Area designation is removed from that part of KEA1 comprising the former Hendon Paper Mill. I would further recommend that the site should be designated white land with its future use being considered as part of the Allocations and Designations Plan (MM).'

The Main Modifications proposed to The Key Diagram, Key Diagram for South Sunderland and Policies Map do now appear to show the removal of the Hendon Paper Mill site from the Hendon Key Employment Area (KEA1), as requested by the Inspector.



6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

N/A

**7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.**

N/A

## **8. Declaration**

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed: **Ian Lyle**

Date: **22 Oct 2019**

## **Completed forms should be returned to:**

Email: [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk); or

Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 2DN

25 OCT 2019

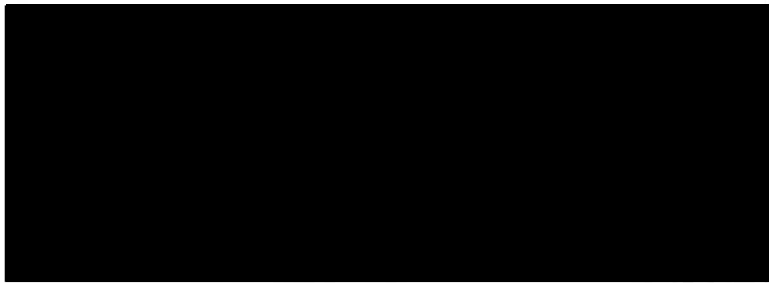
25 October 2019

Dear Sirs

**GREEN BELT STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Department  
Pearce, M. 1132981, MMC190

Name: MRS MAURZEEEN PEARCE



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# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form



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Please note that you should include all information, evidence and supporting information which is required to support your representation and any suggested changes.

All comments that relate to the Main Modifications and which are received within the consultation period (as set out above) will be considered by the appointed Planning Inspector as part of the Examination.

## The Form of Schedule of Proposed Main Modifications

All policy numbers, paragraph numbers and figure numbers set out in the Schedule of Proposed Main Modifications relate to the Sunderland Core Strategy and Development Plan Consultation Publication Draft (SD.1).

This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategy priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Legal compliance with regards to plan making generally refers to the Core Strategy and Development Plan meeting legal requirements under Section 20 (5) of the 2004 Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations, 2012.

It is important that you fill in your contact details below. **We cannot register your representation without your personal details.**

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name, organisation (if relevant) and comments may be made available to the public, in Council committee papers or as otherwise considered appropriate by us. Your personal data i.e. postal addresses, emails and telephone numbers **will not** be shared with the public.

However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

## 1. Your Details

	Your details	Agent details (if applicable)
Name		Richard Swann
Organisation/Group	Persimmon Homes	Barton Willmore
Address Line 1	[REDACTED]	[REDACTED]
Address Line 2		[REDACTED]
Town/City		[REDACTED]
County		
Post Code		[REDACTED]
Telephone no:		[REDACTED]
Email:		[REDACTED]

## 2. Which Main Modification does your representation relate to?

Main Modification Reference	MM
MM9 MM11 MM19 MM41	MM9 - Policy SP5: Figure 26 Key Diagram MM11 - Policy SP6: Figure 29 Key Diagram MM19 - Economic Growth: KEA1 MM41 - Policies Maps

## 3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

Yes       No

## 4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared  Yes  No

Justified  Yes  No

Effective  Yes  No

Consistent with National Policy  Yes  No



- 5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.**

Please see accompanying letter.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

n/a

**7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.**

n/a

**8. Declaration**

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed: **Richard Swann**

Date: **25 Oct 2019**

**Completed forms should be returned to:**

Email: [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk); or

Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN





Strategic Plans Team  
Sunderland City Council  
Burden Lane  
Sunderland  
SR2 7DN

**By Email – [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk)**

30484/A5/HW/RS/lw

23 October 2019

Dear Sir/Madam,

**RESPONSE TO SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN MAIN MODIFICATIONS - MADE ON BEHALF OF PERSIMMON HOMES**

This letter is submitted on behalf of Persimmon Homes ('our Client'), in response to the publication of the Main Modifications to the Sunderland Core Strategy and Development Plan, which are currently out for consultation.

**1. Introduction**

Our Client has multiple land interests at three sites within Sunderland City Council's Authority Boundary, at the former Hendon Paper Mill; Land West of Mulberry Way, Houghton-le-Spring; and the existing Russell Foster Football Centre on Land West of Staddon Way.

The former Hendon Paper Mill site is subject to an ongoing full planning application (Planning Ref: 18/01820/FUL) for construction of 227 dwellings with associated access, landscaping and infrastructure. Discussions are currently ongoing as part of the submission with the Council and consultees to facilitate a successful outcome. The site has previously been proposed to be designated as part of the Key Employment Area for Hendon (KEA1) within Policy EG2: Key employment areas to be safeguarded for B1 use in the emerging Core Strategy and Development Plan.

The two sites, Land West of Mulberry Way and the existing Russell Foster Football Centre, are of importance in the consideration of Policy NE7: Settlement Breaks. Under previous designations, both sites have been subject to Settlement Break designation in Sunderland's Unitary Development Plan.

**2. MM19: KEA1: Former Hendon Paper Mill**

We welcome and support the proposed removal of the former Hendon Paper Mill site from the Hendon Key Employment Area designation (KEA1), in line with our written and oral representations as part of the Examination in Public (EIP). The removal of the site is evident through the revised Key Diagram for South Sunderland proposed via MM9, through Table 3: Key Employment Areas – Available Employment Land proposed as part of MM19 to the Plan's Economic Growth section, and through the revised Policies Map, via MM41.

The proposed deallocation of the site for employment and therefore leaving the site as white land would ensure that employment land is not over supplied in an area which has had limited demand



FS 29637

Registered in England  
Number: 0C342692

Barton Willmore LLP  
Registered Office:  
The Blade  
Abbey Square  
Reading  
RG1 3BE  
F/ +44 (0)118 943 0001

or need for employment use. This is in line with the Inspector's findings in paragraph 6 of the Inspector's Post Hearing Advice – Main Modifications and Related Matters (Ref: EX18.002) as enough provision of employment land exists elsewhere in the authority.

Therefore, we support the removal of the former Hendon Paper Mill site from KEA1 as the site is not required to meet identified employment and economic growth needs across the authority, as stated in our previous representations.

The Main Modification to remove the former Hendon Paper Mill as an employment site under Policy EG2 would also ensure the proposed policy would be effective and sound and would enable the site contributes to Part 3 of Policy SP5: South Sunderland in securing regeneration and renewal at Hendon.

This Main Modification would ensure the preparation of the plan has been made in a positive manner, helps enable the suitable and sustainable redevelopment of the land for residential purposes, and helps to ensure the future regeneration of the site.

### **3. Policy NE7: Settlement Breaks**

Policy NE7: Settlement Breaks of the Core Strategy and Development Plan states the three purposes of settlement breaks to *"prevent the merging of settlements, assist in the regeneration of the urban area of the city and maintain the Green Infrastructure Network"*. Following a review of the Main Modifications, two sites which our Client has interest in have been removed and excluded as Settlement Break designations as they fail to meet these criteria. Our Client supports the exclusion of the sites from Policy NE7 designation.

### **4. Land West of Mulberry Way, Houghton-le-Spring**

With MM30 replacing Figure 41: Settlement Breaks with a revised version in the Core Strategy and Development Plan, we continue to support the revised Settlement Breaks boundaries that removes Land West of Mulberry Way, Houghton-le-Spring, as shown in the revised Policies Map (MM41).

This exclusion of the site from the Settlement Breaks Policy NE7 and Figure 41 takes into account our written and oral representations that development to the west of the site and the construction of the Dubmire Link Road to the east of the site encloses the land within a built form. We are pleased to see the view confirmed that that the site does not serve any of the purposes of a Settlement Break. As such, we are supportive that the Council has not proposed a modification in respect of the Land West of Mulberry Way, and that the land will be removed from the Settlement Break designation.

### **5. MM11: The Russell Foster Football Centre**

From our review of MM11 and MM41, we welcome and support the removal of the Russell Foster Football Centre from the designated Settlement Break land within Policy NE7, as shown in the revised Key Diagram for the Coalfield (MM11) and the revised Policies Map (MM41). The removal of the site is in line with our written and oral representations as part of the EIP. We support findings in the Inspector's Post Hearing Advice – Main Modifications and Related Matters report that as the land will be surrounded by three sides of development and therefore the site no longer serves the purpose of a settlement break. We concur that the land would continue to be covered by Policy NE4: Greenspace.

We therefore support the Council's proposed revision of Figure 41: Settlement Breaks in Appendix 1 of the Council's Schedule of Main Modifications to remove the Russell Foster Football Centre from the Settlement Break designation.

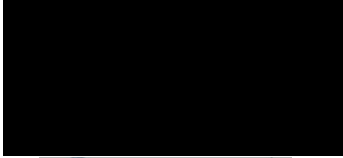
This considers the recent changes in the urban landform surrounding the site with permission granted for residential development which means the site does not offer protection to the merging of settlements and will not act as a vital green infrastructure junction.

We support the exclusion of the site from the settlement break to ensure Policy NE7 is effective and sound.

## 6. Conclusion

Overall, our Client is supportive of the Main Modifications in relation to the sites at the Former Hendon Paper Mill (MM19 and MM41) and the Russell Foster Football Centre (MM11 and MM41), and that Land West of Mulberry Way is unaffected by the Main Modifications. We are pleased with the Main Modifications which have sought to address the issues in soundness we had raised, and believe these revisions will ensure the Core Strategy and Development Plan is justified, effective, consistent with the Framework and positively prepared, and therefore sound for adoption.

Yours sincerely,



**RICHARD SWANN**  
Senior Planner

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

Tag Pickup, D.1116944, MMC344 Council and the  
Plan Strategy and  
Dev

Name D Pickup  
[Redacted]

I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy. Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1. The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land. CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.
- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,

[Redacted Signature]



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning and  
Development Plan process.

Pickup, LA.1134808, MMC343

Name.....

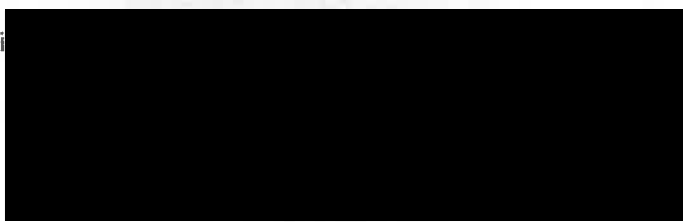
*Lesley A. Pugh*



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Yours faithfully



Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Centre  
Sunderland  
S1 7DN

October 2019

Sirs

## CORE STRATEGY AND DEVELOPMENT PLAN

I agree to [Pringle, J. 1229592, MMC11] Council and the  
Planning In [Pringle, J. 1229592, MMC11] Policy and  
Development Plan process.

Name..... JACK PRINGLE .....

Address..... [REDACTED] .....

..... [REDACTED] .....

..... [REDACTED] .....

Postcode..... [REDACTED] .....

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[REDACTED]

Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
S1 2 7DN

October 2019

Dear Sirs

25 OCT 2019

I agree to my data being used by Sunderland Council and the  
Planning Purvis, L.952795, MMC227 and  
Development

Name... L. Purvis



**CORE STRATEGY AND DEVELOPMENT PLAN**

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