



# Core Strategy and Development Plan

## Report of Representations for Main Modifications – R & S

November 2019

SUNDERLAND LOAL PLAN CSDP – MAIN MODIFICATIONS CONSULTATION

REPORT OF REPRESENTATIONS – R & S

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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 make a contribution to the Council and the  
Planning Ins Rae, D.953963, MMC141 Strategy and  
Development Plan process.

Name MR. DAVID RAE



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

15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland Council and the  
Plan  
Dev  
Rae, L.953962, MMC142

Name... LINDA RAE

Address  
.....

.....

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Postcode  
.....

.....

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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 to my data being used by Sunderland Council and the  
Planning **Rafferty, K.1229956, MMC214** and  
Development Plan process.

Name..... **KEITH RAFFERTY**

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 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.

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.

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.

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.

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 block]

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

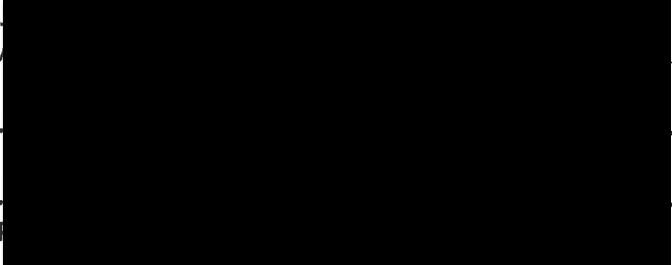
25 OCT 2019

October 2019

Dear Sirs

## GREEN BELT STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the  
Planning Inspectorate. Rafferty, P.1229957, MMC216  
Development Decision process.

Name PAULINE RAFFERTY  


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  
addition 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.

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.

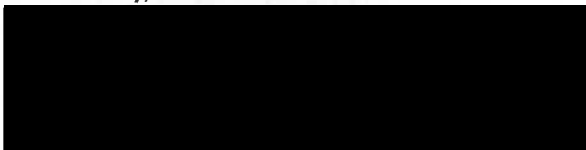
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character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and  
certainly not at the expense of valued greenbelt land.

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.

Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of  
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environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.

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

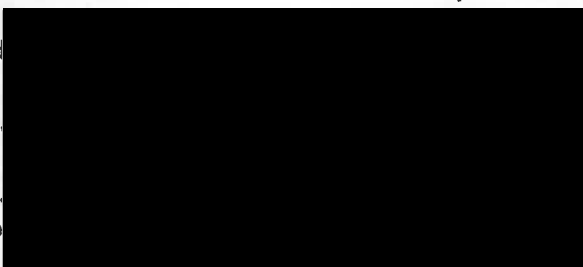
October 2019

Dear Sirs

**GREEN BELT STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Department  
Development Department  
Ramsay, I. 1134639, MMC337

Name.....MR.....IAN.....RAMSAY.....

Address..........

Postcode.....

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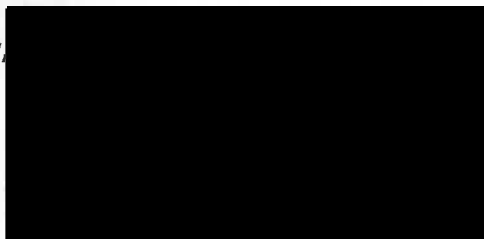
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Yours faithfully,





Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
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 [Redacted] and  
Development Plan process.

Name..... MRS ANNE RENNIE.....

Address [Redacted].....

Postcode: [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]

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 City Council and the Planning Strategy and Development Plan process.

Rennie, M.953855, MMC13

Name... MR MICHAEL RENNIE

Address... [REDACTED]

Postcode: [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]

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 Department process.  
Richardson, JB. 1174753, MMC199

Name J. B. RICHARDSON

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**

I Richardson, S.1174746, MMC200 Council and the  
P strategy and  
D

Name Miss S. Richardson

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  
S1 7DN


October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**


I agree **Robinson, C.1132567, MMC2** and the  
Planning and the  
Development Plan process.

Name..... C. Robinson .....

Address.....  .....

.....

.....

Postcode.....  .....

.....

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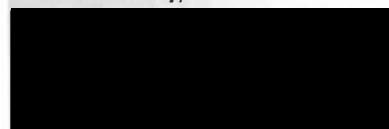
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Yours faithfully,



ROBINSON, C. 1132567

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 n Robinson, J. 1134837, MMC42 and the  
Planning In and  
Development Plan process.

Name... JOHN ROBINSON

Address

Postcode

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Yours faithfully,

[Redacted signature]

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  
Name: Robinson, K.951684, MMC221  
Development

Name: MR. K. ROBINSON

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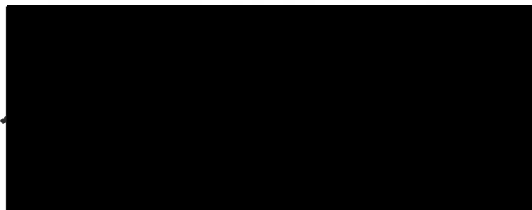
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Senior Planning Officer  
Planning Strategy  
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Sunderland  
S1 2 7DN

October 2019

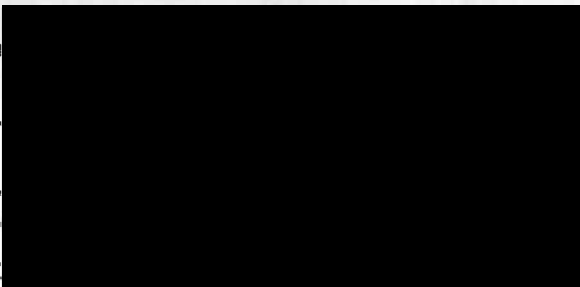
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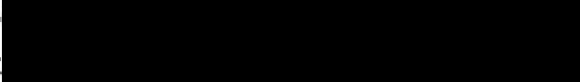
**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to **Robinson, K. 1125158, MMC179** Council and the  
Planning Strategy and  
Development Plan process.

Name Kate Robinson

Address 

Postcode 

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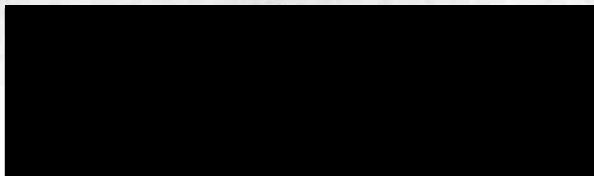
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Yours faithfully,



Senior Planning Officer  
Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
City Centre  
Sunderland  
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 Policy Board (PPB) for the Core Strategy and  
Development Plan process.

Name MRS M ROBINSON  
Address   
Postcode

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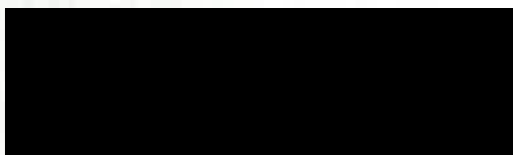
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Planning Strategy  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

25 OCT 2019

15 October 2019

Dear Sirs

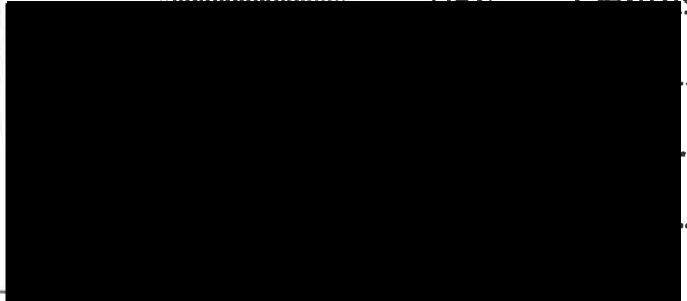
**CORE STRATEGY AND DEVELOPMENT PLAN**

Robinson, ME.1134839, MMC43

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Development Plan process.

Name..... MAUREEN ELIZABETH ROBINSON



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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 Inspectorate in relation to the Core Strategy and  
Development Plan. Robinson, N.1132569, MMC14

Name: N. Robinson

Address: 

Postcode: 

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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

**GREEN BELT STRATEGY AND DEVELOPMENT PLAN**

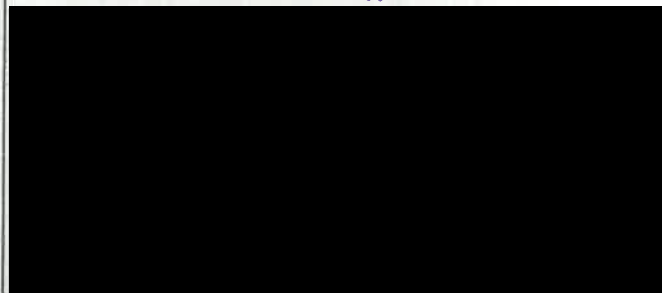
I agree **Robson, D.1132559, MMC207** and the

Planning

and

Development Plan process.

Name MRS DOROTHY ROBSON



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

October 2019

25 OCT 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

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Planning, Robson, K. 1133069, MMC194 and  
Development Plan process.

Name: MR. K. ROBSON



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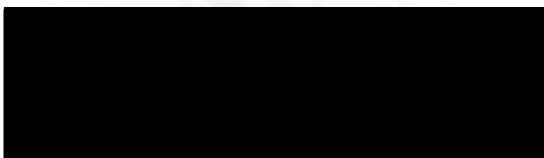
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Yours faithfully,





engineering solutions, delivering results

**FAIRHURST**

Our Ref: EH/DW/DL/124542/010

Date: 25 October 2019

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

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

Dear Sirs

### 124542: Representation to Sunderland Core Strategy and Development Plan – Proposed Main Modifications Consultation

Fairhurst write on behalf of the Russell Foster Football Centre in respect of proposed modification 11 to the Proposed Policies Map associated with the Sunderland Core Strategy and Development Plan (CSDP). This modification proposes the removal of the Russell Foster Football Centre at Coaley Lane, Newbottle from the Settlement Break inline with recommendation made by the Inspector following the Examination in Public of the submitted CSDP. Fairhurst support the principle of the removal of the Football Centre from the Settlement Break inline with the Inspector's recommendations, however, we note that the extent of land currently proposed to be removed from the Settlement Break does not reflect the full extent of the Football Centre. Fairhurst consider that additional land associated with the Football Centre should also be removed from the Settlement Break to ensure the effectiveness of proposed Policy NE7 of the CSDP: Settlement Breaks.

Please see the plan enclosed with this letter which identifies the land subject to this Representation. This land lies to the north of the element of the Football Centre which is currently proposed to be removed from the Settlement Break. Please note that there has been additional tree removal over and above that shown on the enclosed aerial image and the boundary proposed for removal from the Settlement Boundary represents the area which is now cleared of trees (with the exception of a small area to the south).

You will be aware that the Inspector in the Post Hearings Advice (PHA, July 2019) states, in relation to the Russell Foster Football Centre that *'the Policies Map should be amended to exclude the site from the settlement break so that Policy NE7 is effective (MM).'* It is Fairhurst's opinion that the Inspector in this comment is referring to the Football Centre in its entirety and therefore the land subject to this Representation should be removed from the Settlement Break on the basis of this comment. Notwithstanding this, Fairhurst will demonstrate that the land does not meet the objectives of a Settlement Break and therefore should also be removed to ensure the effectiveness of Policy NE7.

Policy NE7 states that Settlement Breaks will serve the following purposes:

- i. Prevent the merging of settlements;
- ii. Assist in the regeneration of the urban area of the city; and
- iii. Maintain the Green Infrastructure Network...

Continued...

Additionally, the definition of Settlement Breaks within the Glossary of the Local Plan states that '*Settlement Breaks consist of open areas around and between parts of a settlement which maintain the distinction between the countryside and the built up area*'.

To firstly address the definition of the Settlement Break having the intention to maintain the distinction between the countryside and the built up area. The site subject to this Representation is formed of playing pitches and is therefore linked in nature with the remainder of the Football Centre and is considered to form part of the '*built up area*' as opposed to '*open countryside*'. Indeed, the changing facilities and parking associated with these pitches are proposed to be removed from the Settlement Break. The boundary to the Settlement Break should therefore be drawn around the playing pitches to maintain this distinction between the countryside and built up area inline with the definition of a Settlement Break.

Notwithstanding this, the site will be assessed against each of the purposes of the settlement break in turn below:

*i. Prevent the merging of settlements*

The Settlement Break Review indicates that this area forms part of the Newbottle/Sedgeleth Settlement Break which separates Success, Sunnyside and Crofter's Estate (Section 8). This area has undergone significant changes in recent years, most notably through the granting of planning permissions for residential development on land to the north and south of Coaley Lane (15/00815/HYB and 16/02357/FPA respectively). These planning permissions should be taken into account in considering whether the site subject to this Representation should be removed from the Settlement Break.

In terms of the separation of Newbottle to Sunnyside, these settlements have been recently joined together by the granting of planning permission 16/02357/FUL on land to the South of Coaley Lane. The site subject to this Representation lies to the north of this recent planning permission with Newbottle lying to the east and open space to the west. This relationship is illustrated on the site plan enclosed with this letter which demonstrates that the site forms no purpose in separating Newbottle from Sunnyside and cannot therefore be justified in being included in the Settlement Break for this purpose.

In terms of the separation between Success to the north and Sunnyside to the south, the previous boundary to the Settlement Break was formed by Coaley Lane, except where the field associated with planning permission 16/02357/FUL lies and a north-south corridor of open space was in existence. Following the granting of planning permission 15/00815/HYB to the north of Coaley Lane this boundary has been relocated northwards and is now made up of existing woodland. This does reduce the settlement break between Success and Sunnyside, however, development of planning permission 15/00815/HYB is underway and that is the existing situation. This has required this relocation of the settlement break boundary in this area. As currently proposed the revised boundary lies to the north of the permitted development and the runs through the middle of the Football Centre. The fact that the boundary runs through the centre is not considered to be a defensible boundary it is suggested that this is relocation surround the Football Centre and utilise the surrounding woodland as a sensible and defensible boundary. This would be consistent with the Settlement Break Review (SBR) which identifies the woodland as the main element of the Settlement Break recognising that '*the eastern part of the site was planted with woodland, but much of this was replaced by junior football pitches, plus a changing block and car park*'.



Although the relocation of the boundary around the land subject to this Representation would reduce the size of the Settlement Break between Success and Sunnyside in this area there would remain a significant 'break' and it is important to recognise that the use of the site as playing fields is protected by the NPPF and Policy NE4 of the CSDP and therefore the site will continue to serve the function of a settlement break without the necessity of an allocation under policy NE7.

Indeed, it is also noteworthy that the break between Newbottle and Philadelphia is significantly smaller on land to the east of the site. In this regard existing residential development of Newbottle to the east of the Football Centre extends significantly closer to Philadelphia than the playing pitches subject to this Representation.

In light of the above, it is not considered justified or necessary to include the site in the Settlement Break in order to prevent the merging of the surrounding settlements.

*ii. Assist in the regeneration of the urban area of the city*

As the use of the site as playing fields will continue to be protected by both national and local planning policies it is not considered that the removal of these from the Settlement Break would have any detrimental impact on the regeneration of the urban area of the city in that development would be re-directed to the site. Very specific circumstances would have to be met in order for any development other than that associated with the use of the site as playing fields to be justified. It is, however, noted that the changing facilities and car parking currently associated with the pitches is located in the area currently proposed to be removed from the Settlement Break and should a situation arise in the future where the remainder of the football centre is redeveloped, then these pitches could be left with no facilities and could become abandoned and fall into disrepair. This would have a negative impact in the regeneration of the city.

It is indeed considered that removal of the site could act to support the existing use of the playing fields in providing scope for improvement to the facilities to be provided.

In light of the above it is not considered justified or necessary to include the site in the Settlement Break to assist in the regeneration of the urban area of the city.

*iii. Maintain the Green Infrastructure Network*

The Green Infrastructure Constraints Plan included within Section 8 of the SBR identifies the site as being in use as 'outdoor playing fields'. As identified by the Inspector in the PHA the use of the site as outdoor playing fields is protected by the NPPF and Policy NE4 of the CSDP and therefore the land is not required to be located within the Settlement Break in order to allow the site to continue to function as part of the Green Infrastructure Network in respect of its use as playing fields.

The site is also identified as being within the Local Green Corridor which did run north-south through the site from Success to Sunnyside. However, following the granting of planning permission 16/072357/FPA for the erection of dwellings on land at Coaley Lane there is no longer functioning green corridor running north-south in this area. This site lies directly to the south of the Football Centre and cuts off any former north-south green corridor. Notwithstanding the lack of north-south Green Corridor it is important to continue to recognise that the use of the site as playing fields is protected by the NPPF and Policy NE4 of the CSDP and therefore Settlement Break protection is not required to ensure the site continues to function as part of the Green Infrastructure Network in the way it does currently.

In light of the above it is considered that the removal of the site from the Settlement Break will have no detrimental impact on the ability of the Council to maintain the Green Infrastructure Network and therefore this is not a reason for the inclusion of the site in the Settlement Break.

I trust the above is self-explanatory and respectfully request that the additional land subject to this Representation and highlighted in red on the enclosed plan is removed from the Settlement Break along with the remainder of the Russell Foster Football Centre to ensure the effectiveness of proposed Policy NE7.

Yours sincerely



Dominic Waugh MRTPI  
Technical Director  
Planning and Development





Figure 1: Land at Russell Foster Football Centre



PLEASE SIGN THIS LETTER, COMPLETE THE CONTACT BOX, AND RETURN IT TO THE SPRINGWELL VILLAGE COMMUNITY VENUE (BY 23<sup>RD</sup> OCTOBER), or post it directly to the Council (address below)  
**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  Council and the  
Planning Strategy and  
Development Plan process.

Name MADELEINE A. SCOTT-GRAY



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.

You

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 for the Planning and the Development Plan process.

Sheppard, KJ.953936, MMC240

Name: KEVIN JOHNS SHEPPARD

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.

**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.

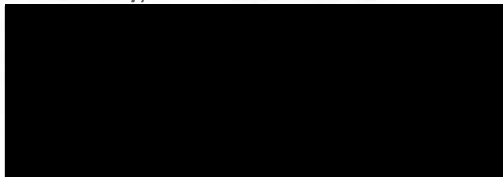
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

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 the proposed development on the site of the Council and the  
Planning application number **Silk, A.953973, MMC332** strategy and  
Development Plan process.

Name ANGELA SILK

Address [REDACTED]

Position [REDACTED]

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 addition to site HGA 1 (South west Springwell Village, north of Mount Lane):

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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 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

116918

25 OCT 2019

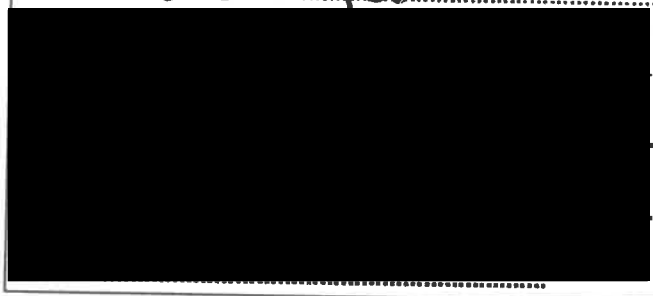
15 October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used for the purposes of the Planning and Development process. Simpson, J. 1116918, MMC27 and the y and

Name... June Simpson .....



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 1133129  
Commercial Development Directorate  
Sunderland City Council  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

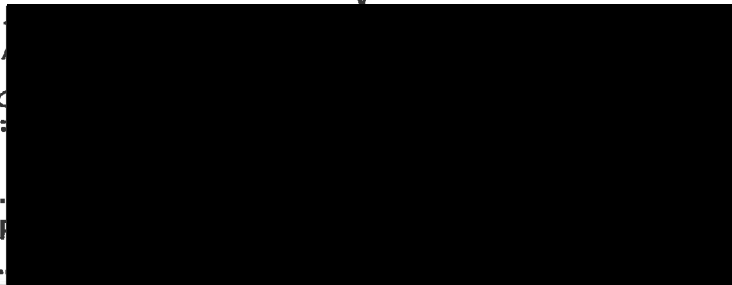
Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

25 OCT 2019

I agree to my data being used by Sunderland City Council and the  
Planning Department for the Core Strategy and  
Development Plan process.  
Simpson, R.1133129, MMC28

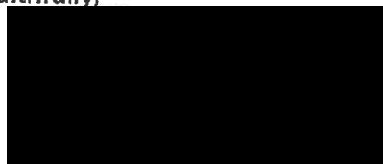
Name: Ronnie Simpson



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Yours faithfully,



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

October 2019

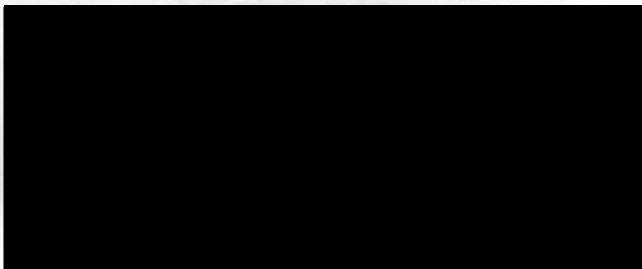
Dear Sirs

25 OCT 2019

## CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the  
Plan Smith, J. 1134662, MMC165 and  
Dev

Name Mrs Joan Smith



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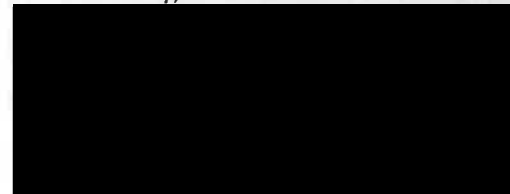
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Yours faithfully,





# 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.

The Schedule of Main Modifications, Sustainability Appraisal Addendum and supporting documentation are available to view at the examination webpage at [www.sunderland.gov.uk/csdpeip](http://www.sunderland.gov.uk/csdpeip)

Copies of the Schedule of Main Modifications, Sustainability Appraisal and supporting documentation are also available to view at Sunderland Civic Centre, Burdon Road, Sunderland SR2 7DN during normal opening hours (8.30am to 5.15pm Monday to Thursday, and 8.30am to 4.45pm on Friday) and at all Council Libraries.

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	ANGELA SILK (formerly Templeman)	
Organisation/Group	SPRINGWELL VILLAGE RESIDENTS ASSOCIATION	
Address Line 1	[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
see attached letter	

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

Inspector Dakeyne stated at the EIP that he would consider new information, see attached letter for new information.

There have been a number of significant developments that have emerged since the EIP that risk making the plan unsound and not legally compliant. These include Northumbrian water reservoir adjacent to site HQA1, and the Council's own response (to the Inspector's initial findings) regarding identification of additional land availability.

See points (a) (c) (d) (e) (f) and (g) in attached letter

It should also be noted that the Council provided inaccurate and therefore misleading information re bus services in Springwell village - please see point (b) in attached letter. This could affect the Inspector's view of the suitability of site HQA1 for development.



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.

SVRA believes that HGAI should not be included in the CSDP for reasons stated in the attached letter.

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.

The plan risks being unsound and not legally compliant because — see points 'b' and 'c' of the attached letter.

## 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: pp Pauline Cooper, Secretary, SVRA

Date: 25/10/19

## 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  
Civic Centre  
Sunderland  
SR2 7DN

15 October 2019

Dear Sirs

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

We welcome the recommendations made by Inspector Dakeyne that sites HGA2 and Safeguarded Land South of East Springwell and the area around Peareth Hall Farm and Gospel Hall remain within the greenbelt. We wholeheartedly agree that the combined sites form a fundamental part of the gap between Springwell Village and the A194(M) and built up area of Washington. And that it also forms part of the landscape setting of the village, being within an area shown for 'Landscape Protection and Enhancement' in the Landscape Character Assessment. We welcome Council's modifications to the CSDP reflecting these recommendations and feel that without these modifications there would be considerable risk to the character and setting of Springwell Village.

However there are a number of comments we would like to make in relation to site HGA1 – South West Springwell (North of Mount Lane), each relying on information that has emerged since the EIP and each relating to the soundness of the Plan:

- 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 Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The site is not served by public transport.

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 effects on environment, wildlife and ecology. .

It should be noted that the only bus service to Sunderland from the village is the 56 and incurs a journey time of approximately 45 minutes, meaning a daily return commute to destination can take up to 2 hours.

Therefore site HGA1 is not accessible with public transport – all bus stops are further than 800 metres away and deemed “low access”.

Clearly this impacts upon the Sustainability Appraisal (incorporating SAE Appendix E (where it is incorrectly rated ‘xx’ – it should be rated ‘-’). The proposed development is not sustainable.

[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication- Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5\\_Sunderland\\_Publication\\_Draft\\_CSDP\\_Sustainability\\_Appraisal\\_incorporating\\_SEA\\_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

c. Other Sustainability Assessment Issues:

Biodiversity is rated “o” – a nonsense given this is a wildlife corridor

Access to Primary School – rated “xx” when it is much is further walking distance than 500m

Cultural Heritage - Historic Environment rated “o” – when it is in close proximity to the Bowes Railway

Greenbelt Purposes: the SA assessment of “uncertain” impact makes no sense given that this proposal is for a deletion of the greenbelt. The negative impact is obvious

The judgment in *Calverton Parish Council v Nottingham City Council and Ors*(2015) – para 19 :  
“The second sentence of paragraph 83 (NPPF) supplies a fetter or brake on development which would, were it not for the Green Belt, otherwise be sustainable; but in deciding whether exceptional circumstances pertain regard must be had to the whole picture, including as I have said the consequences.”

“Planning Authorities must “consider the Greenbelt boundaries having regard to their intended permanence in the long term”.”

The same judgement states “sustainable development embraces environmental factors, and such factors are likely to be negatively in play where release of Greenbelt is being considered”.

Even if the conclusions of the Sunderland Council’s Sustainability Assessment are upheld – and we strongly dispute them because of the inaccuracy of the data (see b and c above) – **we submit that the Council has not considered the wider setting and circumstances of this site, the implications of using it for housing and the consequences of development – sustainable or otherwise.**

- d. We strongly disagree with the Council’s assertion that the deletion of this site from the greenbelt represents “a logical rounding-off of the village, with the creation of a new durable Green Belt boundary”. The proposal to amend the greenbelt boundary to simply provide a more convenient line on a plan is an unacceptable reason to make such a radical decision. This contradicts the policy to protect “the character and setting” of Springwell Village.



The greenbelt in this area presents a unique perspective and affords immediate and easy access to the countryside and rich wildlife habitats and is a very important aspect of the setting of Springwell Village and the Bowes Railway. It is a huge part of the identity of the village and should not be lost for the sake of "rounding off".

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.

**This does not support "rounding off" as a reason to amend the greenbelt boundary.**

e. Since the EIP, Northumbrian Water Limited has submitted a planning application ref:19/01280/FU4 for a reservoir on land immediately north of Mount Lane and south of site HGA1. This is a huge development that will impact severely the whole area. Despite remaining within the greenbelt, the 9 acres site will not be accessible to the public and there will be in effect an 8-10 metre steep embankment facing Mount Lane, restricting views, affecting the wildlife corridor and altering the whole landscape and character of the area. Another huge intrusion and significant, unacceptable change to the setting of Springwell Village. Given the nature of the application – the protection of water supply and the very limited opportunities for suitable sites for reservoirs - it is likely to exhibit exceptional circumstances and receive approval. **This is a significant change since the EIP and it is the background against which the proposed housing development should now be considered.**

CSDP 2015-33 Publication Draft September HGA1 (iv) states the intention to "maintain wildlife & open corridor". It is impossible to maintain this with the reservoir development adjacent to the site. A housing development on HGA1 can only exacerbate this situation.

There is also a planning approval for a cattery and dog kennels at Fern Hill (west of the NWL site and HGA1) which presents further impacts on the environment, ecology and setting of the area. This has not been considered.

f. The plans for the reservoir reveal an access road for site HGA1 to the east of the site. Clearly this will be the only entry and exit route for the proposed housing development. This detracts from the safety of the access road to Broom Court, severely affects Mount Cottage and increases traffic volumes on Mount Lane. Mount Lane is a narrow country lane that is constrained by a bottleneck at its western end. The bottleneck is created by terraced houses so widening is impossible. The Inspector already has photographic evidence.

Traffic turning left onto Mount Lane travelling eastwards will need to turn onto Springwell Road which is already very heavily used and at unacceptably high levels for the very narrow village roads. Photographs taken since the EIP are attached.

The Council's EX19.011 CSDP Infrastructure Delivery Plan cites no measures to mitigate these issues.

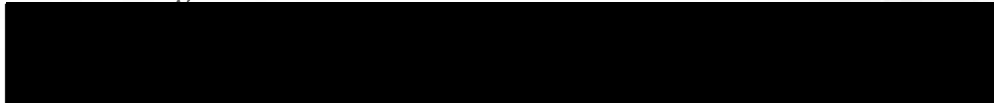
g. I refer to the Council's response to Inspector Dakeyne's recommendations as follows:  
"the Council is satisfied that through the Allocations and Designations Plan it will be able to identify a sufficient supply of sites to ensure that a buffer of approximately 10% is retained. This will include consideration of the following sources of supply: • Sites identified as deliverable and developable within the Strategic Housing Land Availability Assessment (SHLAA); • Potential for accelerated construction on existing large sites which currently extend beyond the Plan Period; • **Inclusion of other sites within the Existing Urban Area**

which have become available since the publication of the latest SHLAA; and • Potential for an early release of the Safeguarded Land. Taking into account the need to replace the existing Unitary Development Plan (1998) “

The availability of more brownfield/urban sites- identified/cited since the EIP for housing means that **“exceptional circumstances” to build on greenbelt are not demonstrated and certainly cannot be justified on site HGA1.** The effect of losing the proposed number of houses from the Plan is negligible. They can easily be accommodated on more accessible and well served (by public transport, roads, schools, shopping and medical services) sites eminently more suitable for housing.

We trust you will give these comments due consideration.

Yours faithfully,

A large black rectangular redaction box covering the signature of the sender.

*PP* Angela Silk

Chairperson  
Springwell Village Residents Association

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

DAILY OCCURRENCE AT JUNCTION OF  
PEARRETH HALL ROAD + SPRINGWELL ROAD



DAILY OCCURRENCE AT JUNCTION OF  
PEARRETH HALL ROAD + SPRINGWELL ROAD



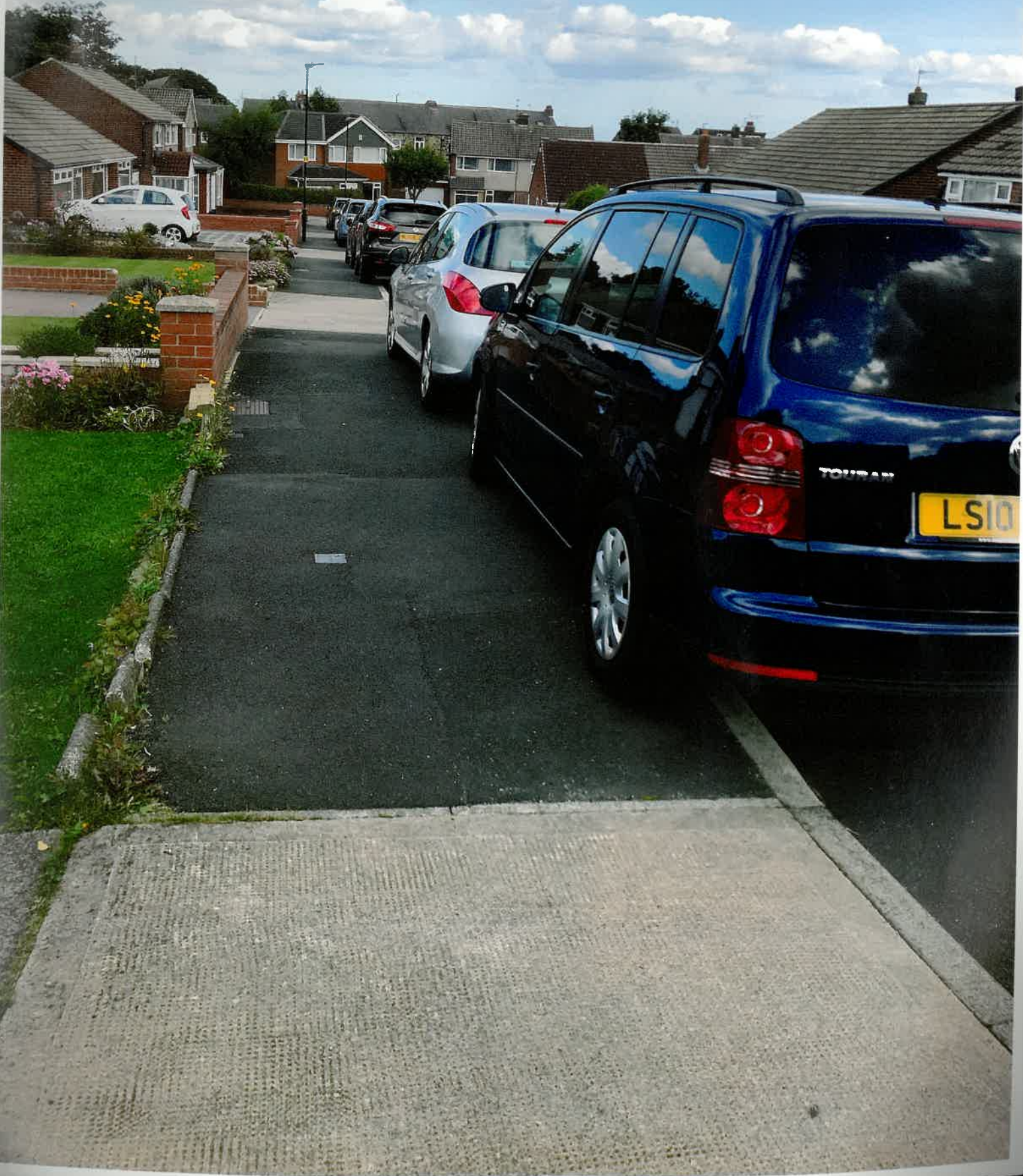


CONGESTION ON FELL ROAD,  
NEAR POPULAR COMMUNITY VENUE





PARKING IN RESIDENTIAL STREET TO  
AVOID CONGESTION OUTSIDE SCHOOL







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

25 OCT 2019

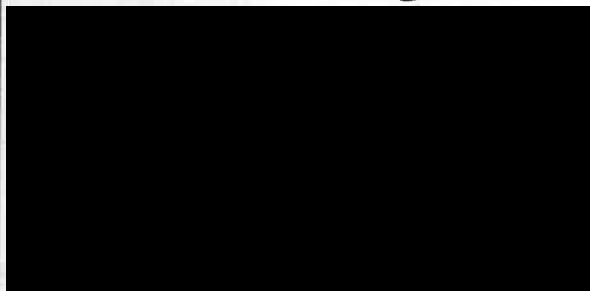
October 2019

Dear Sirs

**CORE STRATEGY AND DEVELOPMENT PLAN**

I agree to my data being used by Sunderland Council and the  
Planning Department  
Development  
Name: Stephenson, C.953515, MMC339

Name: Ms CAROL STEPHENSON



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. 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.

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.

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.

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,



# 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.

The Schedule of Main Modifications, Sustainability Appraisal Addendum and supporting documentation are available to view at the examination webpage at [www.sunderland.gov.uk/csdpeip](http://www.sunderland.gov.uk/csdpeip)

Copies of the Schedule of Main Modifications, Sustainability Appraisal and supporting documentation are also available to view at Sunderland Civic Centre, Burdon Road, Sunderland SR2 7DN during normal opening hours (8.30am to 5.15pm Monday to Thursday, and 8.30am to 4.45pm on Friday) and at all Council Libraries.

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		Neil Westwick
Organisation/Group	Story Homes and Mr Norman Elliott	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM29	Policy NE6

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

We respond on behalf of our client Story Homes and Mr Norman Elliott and object to the content of Policy NE6.

Whilst the proposed modification to Policy NE6 (MM29) relates to a relatively minor change to the Policy name, it is clear from reading the Inspector's Post Hearings Advice response to the Council [EX18.002] that Policy NE6 forms part of the basis for the initial conclusions reached and the recommendation to delete HGA2 (East Springwell) and 'land South East of Springwell' from Policy SS3.

As set out in our client's response to MM5, we consider that the basis on which the Inspector has recommended the deletion of the site is fundamentally flawed - this is in part due to the interpretation of, and weight given to, Policy NE6 as currently drafted. Our client has only identified this issue in response to the Inspector's response [EX18.002] but considers that a modification is required to make the Plan sound.

Policy NE6 (Green Belt) states that the Green Belt in Sunderland will serve the following (5) purposes (inter alia): "*iv. Preserve the setting and special character of Springwell Village and Newbottle Village*". However, contradicting Policy NE6, paragraph 10.33 in the supporting text refers to a single purpose of the Green Belt in relation to Sunderland "to check the unrestricted sprawl of the existing built-up area".

Our client does not consider there to be any justification to attribute specific protection to Springwell Village. Paragraph 80 of the NPPF (2012) [purpose 4] states that the Green Belt serves "*to preserve the setting and special character of historic towns*". Springwell Village is neither historic or a town meaning that Policy NE6 is not consistent with national policy. The contradiction between the Policy and the supporting text of the Plan also limits the weight which can be afforded to this Policy until this is addressed. The reference to Springwell Village in Policy NE6 appears to be a continuation of Sunderland Unitary Development Plan (UDP) (1998) Policy CN2 (extract included). This reference is therefore a legacy issue but there does not appear to be any justification in the evidence base of the Core Strategy and Development Plan (CSDP) for giving the settlement any specific protection.

It is clear from our analysis (as detailed further in our client's response to MM5) that Springwell Village has developed almost entirely over the last 120 years which demonstrates that it is not a historic settlement and Springwell Village is not covered by any designated Conservation Areas. Our client considers that there is no justification to identify Springwell Village as having any historic character which is worthy of special protection.

We would question whether there is a need to include subpoint 1 iv in Policy NE6 as there do not appear to be any historic towns in Sunderland which have a special character worthy of specific protection. As such, we request the following change to make the policy consistent with national policy:

"...

*iii. assist in the regeneration of the urban area of the city; **and***

*~~iv. preserve the setting and special character of Springwell Village and Newbottle Village; and~~*

***iv. prevent the merging of Sunderland with Tyneside, Washington, Houghton-le- Spring and Seaham, and the merging of Shiney Row with Washington, Chester-le-Street and Bournmoor.***

..."

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.

As explained in our client's response to Question 5, we request the following change to Policy NE6 to make the policy consistent with national policy:

“...  
...

*iii. assist in the regeneration of the urban area of the city; **and**  
iv. ~~preserve the setting and special character of Springwell Village and Newbottle Village; and~~  
iv. prevent the merging of Sunderland with Tyneside, Washington, Houghton-le- Spring and Seaham, and the merging of Shiney Row with Washington, Chester-le-Street and Bournmoor.*

...”



**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:

Date:

### **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



# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form





# Proposed Main Modifications Consultation Comment Form

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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		Neil Westwick
Organisation/Group	Story Homes and Mr Norman Elliott	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM32	Policy NE9

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Consistent with National Policy	<input type="checkbox"/> Yes	<input checked="" 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.**

We respond on behalf of our client Story Homes and Mr Norman Elliott and object to proposed modification to Policy NE9 and the supporting text.

The modification to paragraph 10.43 seeks to clarify that “*valued landscapes in Sunderland equate to those areas highlighted in the city’s Landscape Character Assessment (LCA) for ‘landscape protection’*”. MM32 also refers to a map at Appendix 3 which shows the areas of landscape protection.

Our client raised this matter orally during the Examination Hearing Sessions after identifying that Council first proposed to include this plan in its response to Matter 2 [EX3.001] (the response to the Inspector’s Question 6.2).

We suspect that this was a time-pressured decision by the Council in response to the Inspector’s Matters, Issues and Questions. Unfortunately, this has not been well thought out and is a relatively late and significant change to the Plan (given the quantum of land which is identified on the referenced plan as ‘landscape protection’).

The Landscape Character Assessment (LCA) [SP.47] was undertaken in 2015 and the areas identified for protection are those of *relative* value and does not necessarily relate to Special Landscape Areas (SLA) or areas with statutory protection. There is a perception that the plan in the LCA was the only available option the Council had to refer to in its response to the Inspector’s question. Whereas, this is clearly a subject which needs to be considered more thoroughly and based on robust evidence.

The Landscape Character Assessment (LCA) [SP.47] was undertaken in 2015 and primarily assessed and reported landscape character. Prior to the publication of the current NPPF, there was considerable confusion and debate as to what constituted a valued landscape in the terms expressed by the 2012 NPPF. This has now been clarified in the February 2019 update.

The areas identified in the assessment are those of *relative* value and this does not necessarily or automatically equate to landscapes with value or qualities that can be considered to be the same as or equal to, a locally designated landscape such as a Special Landscape Areas (SLA) or similar landscapes of value identified in development plans as envisaged by the NPPF (2019). The protection stated in the NPPF (2019) relating to valued landscapes should not automatically be applied to the landscapes identified in the character assessment without further work being undertaken, as the necessary assessment of their qualities has not been fully or appropriately undertaken at this stage. They have certainly not been scrutinised or verified in the context of valued landscapes as envisaged by the NPPF (2019). The NPPF (2019) also refers to the identified qualities of landscapes being made in the Development Plan, if they are not identified through their statutory status by designation. Again, the necessary and appropriate assessment of such qualities have not been made or reported in the plan, nor would the inclusion of a plan from a character assessment be sufficient to address this. There is a perception that the plan in the LCA was the only available option that the Council had to refer to in its response to the Inspector’s question. Whilst it is our client’s preference that the reference to value landscapes is removed from the Plan, if it is to be retained, there clearly needs to be based on robust evidence, if it is to be sound, compliant with the NPPF and not be subject to challenge.

Whilst we acknowledge that the Plan is being considered against the provisions of the 2012 NPPF, we consider that weight should be given to the relevant parts of the February 2019 version of the NPPF on this matter. In light of the topic of valued landscapes featuring prominently in appeals, NPPF (2019) paragraph 170 clarifies that valued landscapes should be protected in a manner commensurate with their statutory status of identified quality in the Development Plan.



The 2019 NPPF has clearly sought to encourage valued landscapes to be identified in Development Plans in response to the appeal trends. Whilst we think valued landscapes should be identified in a Development Plan, this should be based on robust evidence and relate to land which has status or identified quality consistent with NPPF (2019) paragraph 170.

It is also unclear whether the areas identified on the proposed Appendix 3 Plan for 'Landscape Protection and Enhancement' are included within the areas proposed as valued landscapes. It is notable that there are a number of allocations in the Plan located along the River Wear Corridor and within the North and South Sunderland Sub Areas which fall within an area for 'Landscape Protection and Enhancement'.

As set out in our client's response to Matter 2 (Question 6.2) [EX3.012(a) and EX3.012(b)], it is considered that a valued landscape is a high bar and should be used selectively rather than to identify large swathes of land across the city.

Our client considers that the identification of valued landscapes needs to be properly considered and based on robust evidence to ensure the Plan is positively prepared, effective and consistent with national policy.

**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.**

As explained in our client's response to Question 5, we do object to MM32 as currently drafted.

The plan proposed at Appendix 3 which has been taken from the Landscape Character Assessment does not meet the requirements set out in NPPF (2019) paragraph 170 which is material to this matter.

To resolve this matter, we request either the modification and any references to valued landscapes to be deleted from the plan or robust evidence is provided to identify landscapes which meet the provisions of NPPF paragraph 170.

**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:

Date:

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# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form



# Proposed Main Modifications Consultation Comment Form

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- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategy priorities; and
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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		Neil Westwick
Organisation/Group	Story Homes and Mr Norman Elliot	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████
Telephone no:		██████████
Email:		██████████████████

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

Main Modification Reference	MM
MM6	Policy SS3

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Consistent with National Policy	<input type="checkbox"/> Yes	<input checked="" 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.**

We respond on behalf of our client (Story Homes and Mr Norman Elliot) in relation to land at East Springwell (HGA2) and land South East of Springwell (SS3).

We do not agree with the decision to delete HGA2 (and the safeguarded land South East of Springwell within Policy SS3) and for the reasons detailed below we consider the proposed associated modifications to be unsound.

As detailed in our client's response to MM4 and MM5, the associated modifications relating to the deletion of HGA2 and land South East of Springwell identified in Policy SS3 would undermine the intentions of the Core Strategy and Development Plan (CSDP) to address the spatial imbalance in the distribution of housing land supply.

The response to MM5 in particular demonstrates our client's view that the basis in which the Inspector formed his conclusions in Post Hearings Advice response to the Council [EX18.002] is fundamentally flawed.

We have not sought to repeat the content of the responses to either MM4 or MM5 but the case detailed in each response is equally relevant to the proposed modification to Policy SS3.

**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.**

Our client requests that the proposed changes to Policy SS3 and HGA2 are reverted to retain East Springwell (and land South of Springwell in Policy SS3) as land to be removed from the Green Belt. This would also mean that the associated proposed modifications to paragraphs 4.44 and 4.46 would be reverted.

We consider that the basis on which the Inspector has arrived at the recommendation to delete HGA2 and the safeguarded land South East of Springwell is flawed, and unsound, and trust that the evidence provided in this response will be given due consideration.

**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

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Signed:

Date:

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# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form



# Proposed Main Modifications Consultation Comment Form

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## 1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████
Telephone no:		██████████
Email:		██████████████████

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

Main Modification Reference	MM
MM21	Policy BH1

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

We respond on behalf of our client (Story Homes) in relation to the modifications to Policy BH1 (MM21).

Our client welcomes the changes made to subpoint 8 which now includes wording to ensure landscaping is provided where it is appropriate and viable to do so.

With regards to subpoint 10, we consider that the proposed changes could be reworded to ensure the requirement is clear and effective. We request the following:

“ ...

10. ~~avoid~~**retain**, where possible, ~~disruption to~~ established views of important buildings, structures and landscape features;

Our client also supports the amendment to subpoint 14 and the new paragraph (9.5) in the supporting text which allows for a transitional period before the Nationally Described Space Standards (NDSS) come into effect. We also welcome the clarification in paragraph 9.5 that NDSS will not be retrospectively applied to applications for approval of reserved matters where the outline application was determined or minded to approve before 1 April 2021.

Paragraph 9.6 is subject to a proposed modification to clarify that masterplans or development frameworks will be required for development proposals which exceed either 250 dwellings or 5 hectares.

Whilst we consider 250 dwellings to be a reasonable threshold, 5 hectares is likely to relate to development for a number of dwellings much lower than this figure. If it is assumed that a site of 5 hectares will deliver around 250 dwellings, on the basis that the net developable area of the site would be 75% (consistent with assumptions in the SHLAA), 250 dwellings on a site of this size would be at a density of around 67 dwellings per hectare which is clearly very high and not realistic. Therefore, it is recommended that paragraph 9.6 is amended to clarify that the 5 hectare threshold only applies to non-residential development so that there is only one threshold that applies to residential development.

Therefore, to ensure the requirement is reasonable and justified, we request the following change.

*“9.6 Masterplans or development frameworks should be prepared for large scale development, in particular those which will be phased. For clarity, large-scale development within the context of this policy is considered to be that which exceeds 250 dwellings **for residential-led development** or 5 hectares **for non-residential-led development**.”*

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.

As explained in our client's response to Question 5, we request the following change to Policy BH1 and paragraph 9.6 to make the policy justified and effective:

“...  
“

10. ~~avoid~~**retain**, where possible, ~~disruption to~~ established views of important buildings, structures and landscape features;

“9.6 Masterplans or development frameworks should be prepared for large scale development, in particular those which will be phased. For clarity, large-scale development within the context of this policy is considered to be that which exceeds 250 dwellings **for residential-led development** or 5 hectares **for non-residential-led development**.”

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Signed:

Date:

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# Core Strategy and Development Plan 2015-2033

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## 1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████
Telephone no:		██████████
Email:		██████████████████

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

Main Modification Reference	MM
MM22	Policy BH2

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Consistent with National Policy	<input type="checkbox"/> Yes	<input checked="" 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.**

We respond on behalf of our client (Story Homes) in relation to the modifications to Policy BH2 (MM22).

Our client welcomes the change to subpoint 3 which clarifies that the provision of details relating to materials will be required "*at the appropriate stage of development*". Notwithstanding this, it does leave it open to interpretation as to when this will be required and as stated in our earlier responses on this matter, this information is often not known at the planning application stage.

Our client also queries the need for submission of details relating to the source of materials. There is risk in that in being required to provide this information for approval, it could affect decisions by developers and impact upon the timescales for ordering the materials required for development. Should this be the case there is potential for an adverse impact upon the timely delivery of development schemes.

Accordingly, we request the below change to subpoint 3 to ensure this part of the Plan is justified and effective:

"...

*3. provide details of the type ~~and source~~ of materials to be used at the appropriate stage of development;*

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.

As explained in our client's response to Question 5, we request the following change to Policy BH2 to make the policy justified and effective:

“...  
3. ~~provide details of the type and source of materials to be used at the appropriate stage of development;~~

**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

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Signed:

Date:

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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).**

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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		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM24	Policy BH9

## 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.

We respond on behalf of our client Story Homes in relation to the content in Policy BH9 (MM24) to reiterate comments made previously which we consider to be necessary in order to make Policy BH9 consistent with national policy.

Subpoint 2 refers to the preservation and protection of archaeology, whereas the use of language in section 12 of the NPPF adopts the use the words sustain, conserve and enhance as opposed to protect and it is considered that the policy should adopt a consistent approach. The following change to subpoint 2 will ensure the policy is sound:

“...  
2. The council will support **the conservation**, ~~protection~~ and where possible the enhancement of the city’s archaeological heritage, **in a manner appropriate to its significance**, by requiring that...”

Subpoint 2 (ii) as currently drafted states that preference will be given to preserving archaeology in situ. However, this statement is not NPPF compliant. The NPPF advises that “non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets” (Footnote 63). Our Client considers that Policy ~~H~~BH9 (2) (ii) should be consistent with national policy, not more onerous, in order to ensure it is justified and sound.

To address this, we request the following revision:

“...  
ii. Where development affects heritage assets of archaeological interest, ~~preference will be given to preservation in situ~~ **the significance of the asset should be taken into account in determining the application**. The loss of archaeology that is of equivalent significance to scheduled monuments should be wholly exceptional. ~~However where~~ **Where** loss of the asset is justified in accordance with national policy, the remains should be appropriately archaeologically excavated and recorded, the findings assessed and analysed, the resulting archive report deposited with the Tyne and Wear Historic Environment Record and the physical archive deposited with the relevant collecting museum...”

The above changes are required to make the policy consistent with national policy.



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.

As explained in our client's response to Question 5, we request the following change to Policy BH9 to make the policy consistent with national policy:

“...  
2. The council will support **the conservation**, ~~protection~~ and where possible the enhancement of the city's archaeological heritage, **in a manner appropriate to its significance**, by requiring that...”

...  
ii. Where development affects heritage assets of archaeological interest, ~~preference will be given to preservation in situ~~ **the significance of the asset should be taken into account in determining the application**. The loss of archaeology that is of equivalent significance to scheduled monuments should be wholly exceptional. ~~However where~~ **Where** loss of the asset is justified in accordance with national policy, the remains should be appropriately archaeologically excavated and recorded, the findings assessed and analysed, the resulting archive report deposited with the Tyne and Wear Historic Environment Record and the physical archive deposited with the relevant collecting museum...”

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N/A

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

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## 1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	████████████████████
Address Line 2		████████████████████
Town/City		████████████████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		████████████████████

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

Main Modification Reference	MM
MM16	Policy H2

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

We respond on behalf of our client (Story Homes) in relation to the modifications to Policy H2 (MM16).

Our client's key concerns relate to the inclusion of "exceptionally" in subpoint 1 and the requirement for affordable housing in clusters (paragraph 6.21).

Given then subpoint 1 already requires the off-site provision of affordable housing to be justified, we question the justification for including the word 'exceptionally' to subpoint 1 of Policy H2. It is considered that the addition of this wording is not necessary nor justified. As such request that the proposed change to subpoint 1 is reverted as below to ensure the policy is justified and effective:

"...

*1. be provided on-site in order to help achieve mixed and balanced communities. However, ~~exceptionally~~, off-site provision or a financial contribution made in lieu may be considered acceptable where it can be justified;...*"

The modification to paragraph 6.21 advises that affordable housing should be dispersed amongst the market housing in clusters "of a size proportionate to the scale of the development". Whilst our client welcomes the deletion of the reference to "3 to 4 dwellings per cluster", based on experience, Registered Providers prefer affordable homes to be located close to each other for efficiencies in property management and can be deterred if the units are spread around the site too much. The proposed modification does not go far enough to address our concerns and we suggest the following revision to paragraph 6.21 below to ensure this part of the Plan is effective:

*"6.21 In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed **where appropriate and viable** amongst the market housing ~~in clusters of a size proportionate to the scale of the development.~~"*

Notwithstanding this, Story Homes welcome the inclusion of the reference to the affordable housing requirements set by Policy SS6 for the South Sunderland Growth Area (SSGA) in paragraph 6.16. It is considered that this provides the appropriate clarity for setting out affordable housing requirements.

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.

As explained in our client's response to Question 5, we request the following change to Policy H2 (subpoint 1) and paragraph 6.21 to make the policy justified and effective:

“...  
1. be provided on-site in order to help achieve mixed and balanced communities. However, ~~exceptionally~~, off-site provision or a financial contribution made in lieu may be considered acceptable where it can be justified;...”

“6.21 In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed **where appropriate and viable** amongst the market housing ~~in clusters of a size proportionate to the scale of the development.~~”

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	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM26	Policy NE2

## 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.

We respond on behalf of our client (Story Homes) in relation to the proposed changes to Policy NE2 (MM26).

MM26 includes changes to both Policy NE2 and the supporting text at paragraphs 10.9 -10.14. We consider that changes are needed to ensure the policy is justified and effective.

Consistent with our client's comments submitted previously, we request a change to subpoint 6 as follows to include text which acknowledges the benefits which development can offer in providing Green Infrastructure in the wildlife corridors.

"...

*6. Development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor. **Support will be given to development which enhances the provision of Green Infrastructure in the wildlife corridors.***

Paragraph 10.9 relates to Habitats Regulations Assessment (HRA) and instances where Strategic Access Management and Monitoring (SAMM) and/ or the provision of Suitable Alternative Natural Greenspace (SANG) may be required. Our client requests a revision to the final sentence of paragraph 10.9 to ensure the policy and paragraph is justified, effective and consistent with other parts of the Plan. Whilst our client welcomes the recognition that provision of SANG could also contribute to the other open/green space requirements, we do not agree with the reference to useable greenspace.

Our client has also responded to MM32 (Policy 4) where the reference to usable greenspace is also proposed as a modification. As explained in this response, this conflicts with the list of (11) bullet points in paragraph 10.23 which clarifies what comprises greenspace. As 'usable greenspace' is not defined in the Plan, this could lead to uncertainty about what will be expected on-site. Therefore we proposed that "useable" is deleted from 10.9 (and Policy NE4):

"10.9...

*Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained. Where a SANG is proposed as mitigation for HRA impacts, depending on the use and form that the SANG takes it may be possible for this to also be utilised as ~~useable~~ greenspace providing the uses are compatible."*

The above changes are required to make the policy justified and effective.

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.

As explained in our client's response to Question 5, we request the following change to Policy NE2 and paragraph 10.9 to make the policy justified and effective:

"...

6. Development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor. **Support will be given to development which enhances the provision of Green Infrastructure in the wildlife corridors.**"

"10.9...

Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained. Where a SANG is proposed as mitigation for HRA impacts, depending on the use and form that the SANG takes it may be possible for this to also be utilised as useable-greenspace providing the uses are compatible."

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N/A

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## Proposed Main Modifications Consultation Comment Form





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	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Story Homes	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM28	Policy NE4

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

We respond on behalf of our client Story Homes in relation to the proposed changes to Policy NE4 (MM28).

MM28 includes a change in the wording in subpoint 3(i) from amenity greenspace to usable greenspace. For the reasons below, we do not consider this change to be justified and we therefore request that the change is reverted to the original policy wording.

The purpose of Policy NE4 is to detail the requirements relating to the provision of Greenspace. Paragraph 10.23 in the supporting text then proceeds to define Greenspace and sets out a list of 11 bullet points. These bullets are helpful in providing clarity as to what would be considered to comprise greenspace.

As 'usable greenspace' is not defined in the Plan, this could lead to uncertainty about what will be expected on-site. Therefore, we do not consider the MM32 to be justified. As such, we request that subpoint 3(i) is reverted back to the original wording, as set out below:

“ ...

*i. a minimum of 0.9ha per 1000 bedspaces of amenityuseable greenspace on site, unless...*”

The above changes are required to make the policy justified and effective.

Notwithstanding this, we welcome the change to the table which follows paragraph 10.26. This change includes a reduction from the assumed 5 bedspaces to 4 bedspaces per three bedroom dwelling – which we consider to reflect a more reasonable assumption regarding occupancy.

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.

As explained in our client's response to Question 5, we request the following change to Policy NE4 to make the policy justified and effective:

“...  
i. a minimum of 0.9ha per 1000 bedspaces of amenity useable greenspace on site, unless...”

The above changes are required to make the policy justified and effective.

**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



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Signed:

Date:

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# Core Strategy and Development Plan 2015-2033

## Proposed Main Modifications Consultation Comment Form



# Proposed Main Modifications Consultation Comment Form

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Organisation/Group	Story Homes and Mr Norman Elliot	Lichfields
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County		██████████
Post Code		██████
Telephone no:		██████████
Email:		██████████████████

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

Main Modification Reference	MM
MM4	Policy SP3

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Consistent with National Policy	<input type="checkbox"/> Yes	<input checked="" 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.**

We respond on behalf of our client (Story Homes and Mr Norman Elliot) in relation to land at East Springwell (HGA2) and land South East of Springwell (SS3).

We do not agree with the decision to delete HGA2 and the safeguarded land South East of Springwell within Policy SS3 and for these reasons (detailed further in our client's response to MM5) we consider the proposed associated modifications to be unsound.

With regards to MM4, this includes proposed changes to Policy SP3 and the supporting text to reflect the omission of these and other sites. MM4 also includes additional supporting text to set out the exceptional circumstances for Green Belt release in the Washington Sub Area along with a short summary for each of the proposed Housing Growth Areas. The exceptional circumstances for the release of Green Belt land seeks to address the spatial imbalance in the housing land supply.

Paragraph 2.49 in the Spatial Portrait section describes the issues with the spatial distribution of housing supply in recent years with just 14% delivered in the Washington Sub Area. On the same page, Figure 9 (Housing Distribution) is subject to a modification (MM1) which shows the distribution of the housing land supply in the SHLAA (2019) [EX1.020] at 9%. This shows a minor increase in the supply in the Washington Sub Area (from 7.6%) which appears due to the identification of additional dwellings which could come forward in years 6-10 of the Plan. The Main Modifications also include the addition of Figure 13 (Broad Housing Distribution) (MM3) which appears to be consistent with Figure 9.

Given that the distribution of housing is well short of the 14% which has been delivered in recent years, this does not go far enough in our client's opinion, to address the imbalance. It is important to note that the Core Strategy and Development Plan (CSDP) is part 1 of the Plan and is it to be expected that new sites may become available for consideration as allocations in the forthcoming Allocations and Development Plan (Part 2 of the Plan). As such, we do not consider this to compensate for the omission of our client's site (HGA2 and SS3) at Springwell Village – a location which has “experienced limited development over a number of years” (CSDP paragraph 4.23).

Looking closely at the types of housing to be delivered in the Washington Sub Area, the housing trajectory in the Housing Implementation Strategy (September 2019) [EX19.004] includes sites such as Derwent House, Washington (SHLAA ref. 688) which is anticipated to deliver 48 dwellings through the conversion of an office block which has come forward via the permitted development route. Whilst such sites can contribute to the number of units being delivered in the Washington Sub Area, our client questions whether the delivery of this type of housing meets specifically identified need for “larger detached dwellings” as detailed in Policy SS2 (MM5). The product delivered by Story Homes is a high quality, executive-family home and Springwell Village is considered to be an appropriate location/market area to deliver this product. If the site is omitted, it not only affects the number of houses directed to the Washington Sub Area but also the type of homes (i.e. larger detached dwellings) which have been specifically identified by the Council as being in short supply across the City.

Our client therefore considers that the deletion of HGA2 (and the safeguarded land South East of Springwell (Policy SS3)) would be a missed opportunity to address both the spatial imbalance in the Washington Sub Area and the constrained delivery in Springwell Village. The Publication Draft version of the Core Strategy and Development Plan ('the Plan' or CSDP) submitted for Examination clearly responded to the requirements of NPPF (2012) paragraphs 83-85 in ensuring that the Green Belt boundaries are capable of enduring beyond the Plan period; and that the review of the Green Belt boundaries should take into account the need to promote sustainable development.

The Council had responded positively and proactively to these tests and to ensure the Plan was “*genuinely plan-led*” (one of the core planning principles set out in paragraph 17 of the NPPF) and to address the issues identified in the Spatial Portrait section of the Plan.

Our client considers that the decision to delete East Springwell (HGA2) and the safeguarded land South East of Springwell (SS3) contradicts the strategy of the Plan to address the spatial imbalance in housing delivery. The growth directed to Springwell Village was also intended to sustain and enhance the existing level of services within the settlement. The preparation of the Plan is the appropriate opportunity to address such issues and the proposed modification undermines the Plans efforts to address the spatial imbalance.

The omission of the sites weakens the ability of the Plan to deliver its strategy and as a result we consider that it is not positively prepared, justified or consistent with national policy. Therefore, the modification is unsound.

Please refer to our client’s response to MM5 which responds in further detail to the comments identified in the Inspector’s post hearings advice response to the Council [EX18.002].

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Our client requests that the proposed changes to Policy SP3 and Figure 15 are reverted to retain East Springwell and land South East of Springwell as land to be removed from the Green Belt.

Consistent with the additional text proposed after paragraph 4.43, our client requests that an additional paragraph is inserted for HGA2 East Springwell, as follows:

**HGA2 East Springwell**

**The site demonstrates moderate impacts on the Green Belt purposes. Site constraints can be minimised and suitably mitigated for. The site is sustainable and deliverable and represents a logical rounding-off of the village, with the existing substantial landscaping to the south and east of the site providing an opportunity to form a new durable Green Belt boundary.**

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N.A

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# Core Strategy and Development Plan 2015-2033

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Telephone no:		██████████
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## 2. Which Main Modification does your representation relate to?

Main Modification Reference	MM
	Policy SP7

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
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**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.**

We respond on behalf of our client Story Homes in relation to the content in Policy SP7 to reiterate comments made previously which we consider to be necessary in order to make Policy SP7 effective and consistent with national policy.

Policy SP7 (6) (vii) and paragraph 5.5 require that Health Impact Assessments (HIA) are prepared for major developments of 100 dwellings or more. Our client objects to this requirement as requiring all residential schemes for 100 homes or more to submit a HIA is overly onerous and the rationale for the arbitrary threshold is not suitably evidenced or justified. Furthermore, there is no national requirement for HIA to be submitted for major developments. Our Client suggests that this requirement is removed from the Core Strategy and Development Plan (CSDP) to ensure consistency with national legislation.

The amendments made by the Council to paragraph 5.5 to remove reference to all development subject of Environmental Impact Assessment (EIA) requiring a HIA is welcomed. However, the amended text now requires a HIA for *'any other form of development which has the potential to have a significant impact on health.'* By virtue of this description this would necessitate the HIA almost certainly needing to form part of an EIA to cover the likely health impact. This is because triggering this requirement could be seen as being the same as meeting the EIA screening test as to whether there would be a likelihood of significant environmental effects necessitating EIA in respect of socio-economic impacts.

This would set the bar much higher than just arbitrarily requiring 100 dwellings for residential or 100 bed spaces for student accommodation to provide a HIA where no consideration of the extent of potential health impact has been had. That would mean residential and student accommodation unduly having more onerous application requirements without any justifiable evidence. As a result the application of the Policy requirement with regards to different forms of development would be unfair, unbalanced and unsound.

The Policy is therefore neither effective or justified. In order to resolve this, the Policy should be amended to remove subpoint vii and the reference in paragraph 5.5.

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As explained in our client's response to Question 5, we request that subpoint vii and the reference to Health Impact Assessments in paragraph 5.5 are deleted.

This change is required to make the policy effective and consistent with national policy.



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N/A

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# Core Strategy and Development Plan 2015-2033

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Post Code		██████
Telephone no:		██████████
Email:		██████████████████

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

Main Modification Reference	MM
MM35	Policy SP10

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

We respond on behalf of our client Story Homes in relation to the content in Policy SP10 (MM35) to reiterate comments made previously which we consider to be necessary in order to make Policy SP10 effective and consistent with national policy.

The first sentence in Policy SP10 indicates that some of the works will be funded by developer contributions. Whilst our client does not oppose this reference, Policy SP10 should be consistent with the planning obligations tests (NPPF 2012 paragraph 204) and Community Infrastructure Levy Regulations 2010. The works should also explore other funding sources and seek developer contributions as a last resort.

Accordingly, our client suggests the following revision to the first sentence in Policy SP10:

“ ...

*To improve connectivity and enhance the city’s transport network, the council, working with its partners and utilising developer contributions **(where justified and in the absence of other funding sources)** will seek to:...*”

The above changes are required to make the policy effective and consistent with national policy.

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.

As explained in our client's response to Question 5, we request the following change to Policy SP10 to make the policy effective and consistent with national policy:

“...  
“

*To improve connectivity and enhance the city's transport network, the council, working with its partners and utilising developer contributions **(where justified and in the absence of other funding sources)** will seek to:...”*

The above changes are required to make the policy effective and consistent with national policy.

**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:

Date:

### **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



# 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.

The Schedule of Main Modifications, Sustainability Appraisal Addendum and supporting documentation are available to view at the examination webpage at [www.sunderland.gov.uk/csdpeip](http://www.sunderland.gov.uk/csdpeip)

Copies of the Schedule of Main Modifications, Sustainability Appraisal and supporting documentation are also available to view at Sunderland Civic Centre, Burdon Road, Sunderland SR2 7DN during normal opening hours (8.30am to 5.15pm Monday to Thursday, and 8.30am to 4.45pm on Friday) and at all Council Libraries.

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		Neil Westwick
Organisation/Group	Story Homes and Mr Norman Elliot	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM5	Policy SS2

## 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Justified	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Effective	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Consistent with National Policy	<input type="checkbox"/> Yes	<input checked="" 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.**

We respond on behalf of our client (Story Homes and Mr Norman Elliot) in relation to land at East Springwell (HGA2) and land South East of Springwell (SS3).

We do not agree with the decision to delete HGA2 (and the safeguarded land South East of Springwell within Policy SS3) and for the reasons detailed below we consider the proposed associated modifications to be unsound. We also append a Green Belt Landscape Appraisal, prepared by Pegasus Group.

The proposed omission of the sites has been made by the Council in response to the comments in the Inspector's Post Hearings Advice response to the Council [EX18.002]. Paragraph 3 of the Inspector's response clarifies that the findings in the Post Hearings Advice may alter in the light of any further evidence and that the views are given without prejudice to the conclusions in the final report. We therefore trust that due consideration will be given to our client's comments.

The Inspector details his reasons for recommending the deletion of HGA2 and the safeguarded land in paragraphs 7 and 8 of the Post Hearings Advice response. We note that the issues identified by the Inspector were not raised during the EiP hearing sessions and as such our client did not have an opportunity to respond to the concerns before the Post Hearings Advice response was issued.

The Inspector's comments highlight a disconnect between the Green Belt Review reports [SD.29, SD.30, SD.31, and SD.32] and the role of the Green Belt in preserving the setting and special character of Springwell Village "*despite this purpose being expressly set out within Policy NE6*". We disagree with this conclusion and query the weight which has been given to Policy NE6 in arriving at this view – as explained below.

Policy NE6 (Green Belt) states that the Green Belt in Sunderland will serve the following (5) purposes (inter alia): "*iv. Preserve the setting and special character of Springwell Village and Newbottle Village*". However, contradicting Policy NE6, paragraph 10.33 in the supporting text refers to a *single* purpose of the Green Belt in relation to Sunderland "*to check the unrestricted sprawl of the existing built-up area*".

Our client does not consider there to be any justification to attribute specific protection to Springwell Village. Paragraph 80 of the NPPF (2012) [purpose 4] states that the Green Belt serves "*to preserve the setting and special character of historic towns*". Springwell Village is neither historic or a town meaning that Policy NE6 is not consistent with national policy. The contradiction between the Policy and the supporting text of the Plan also limits the weight which can be afforded to this policy until this is addressed.

It is also relevant to consider the origins of the Green Belt purposes in the NPPF which are a continuation of those which were contained in PPG2 (1995 and amended 2001) and therefore are long established. This incidentally formed the national policy context for the preparation of the Regional Spatial Strategy for the North East of England (RSS) (July 2008) which, at Policy 9.5 (extract included), stated that the Green Belt should "*preserve the setting and special character of Durham City, Hexham, Corbridge and Morpeth*". The reference to Springwell Village in Policy NE6 appears to be a continuation of Sunderland Unitary Development Plan (UDP) (1998) Policy CN2 (extract included). This reference is therefore a legacy issue but there does not appear to be any justification in the evidence base of the Core Strategy and Development Plan (CSDP) for giving the settlement any specific protection. It is also notable that the RSS (whilst now revoked but prepared more recently than the last adopted UDP) did not include Springwell Village in the list of towns at Policy 9.5 set out above.

Looking more closely at the characteristics of Springwell Village, its core is limited to the area

around the junction between Springwell Road and Peareth Hall Road where there is a concentrated presence of stone-cottages. This appears to date to the late 19<sup>th</sup> Century meaning that Springwell Village has developed almost entirely over the last 120 years – further evidencing that it is not a historic settlement. This ‘core’ area of the Village is located more than 250m from the site and there is very limited visibility between the two.

The wider composition of the village is eclectic with no distinct or unified architectural style or design which reflects the expansion of the village in the post-war period and in the latter part of the 20<sup>th</sup> Century. The evolution of the settlement is demonstrated by the historic maps which are set out in the enclosed Green Belt Landscape Appraisal, prepared by Pegasus Group. Figures 6 and 7 on page 11 of the Pegasus Group Appraisal in particular demonstrate the growth of Springwell Village in the second part of the 20<sup>th</sup> Century. The later expansion of the settlement includes the growth to the east which is made up of low density modern development which is varied in architectural style. The maps also indicate when the A194(M) was built in the early 1970s which now provides the separation between Springwell Village and Usworth. It is also clear from the 1978 map at Figure 7 that there has since been very limited growth.

In terms of heritage assets, there are only 3 Grade II Listed Buildings and the Bowes Railway Scheduled Monument which are located on the periphery (to the north west and north east) of Springwell Village - on the other side of the settlement from the site. There are no designated heritage assets in the late 19<sup>th</sup> Century core of the settlement. In the context of the Green Belt, paragraph 86 of the NPPF (2012) states that a Conservation Area or normal development management policies should be used if the character of a village needs to be protected. Springwell Village is not covered by any designated Conservation Areas. Our client considers that there is no justification to identify Springwell Village as having any historic character which is worthy of special protection. Whilst it is acknowledged that Springwell has a relatively elevated position in the landscape, there is a need to differentiate between character and landscape considerations due to the topography and physical features of the settlement.

Our client considers that any criticisms identified by the Inspector [EX18.002] are no more relevant to the site than they are to the other allocations nearby – on either side of the A194(M) – which remain in the Plan. In particular, the development of HGA3 for example is considered to be more likely to result in the narrowing of the distance between the development on either side of A194(M).

The enclosed note prepared by Pegasus Group considers the landscape and visual matters relating to the site. It also includes a review of the Council’s assessment of the site (and Springwell Village) in the Green Belt Review [SD30]. The Green Belt Review [SD.30] concludes that the land parcel performs moderately against the five Green Belt purposes. In response to Green Belt purpose 4 (to preserve the setting and character of historic towns), the site is assessed as ‘B’ which, as set out in the methodology, relates to ‘minor impact which can be mitigated’. Given the analysis of Springwell Village above, and in the note prepared by Pegasus Group, we consider that the assessment of the site in the Green Belt Review [SD.30] is robust. Conversely, there does not appear to be any evidence to support the reference to Springwell Village in Policy NE6 which means the basis on which the Inspector has recommended the deletion of the site is fundamentally flawed. The analysis of growth and evolution of Springwell Village, contained in the Green Belt Landscape Appraisal, prepared by Pegasus Group, further demonstrates that there is no justification to afford any specific protection to the settlement and that the Council’s assessment of the site in the Green Belt Review [SD.30] is sound.

The Inspector’s comments (at paragraph 7 of the response [EX18.002]) also refer to the site, together with land at Peareth Hall Farm and the Gospel Hall, forming a fundamental part of the gap between Springwell Village and the A194(M) and the built up area of Washington; and forming part of the landscape setting of the village, being within an area shown for ‘Landscape Protection and Enhancement’ in the Council’s Landscape Character Assessment (2015) [SP.47].

With regards to the first part of the sentence above, we do not agree that the site forms part of a fundamental gap between settlements. Subpoint 5 of Policy NE6 states that the Green Belt will

serve to “prevent the merging of Sunderland with Tyneside, Washington, Houghton-le- Spring and Seaham, and the merging of Shiney Row with Washington, Chester-le- Street and Bournmoor”. There is no mention of preventing the merging of Springwell Village with Washington in Policy NE6.

It is considered that this conclusion cannot be reached when the land south east of Springwell Village is perceived on the ground as opposed to strictly plan or birds-eye view. The topography, the cut to the A194(M) together with the landscape features on either side of the road means that there is very limited visibility of the site from the south and east. The appended note by Pegasus Group confirms that the site can be developed in a manner which would not bring about actual or perceived coalescence of Springwell Village with Washington.

In terms of the Landscape Character Assessment [SP.47], the plan (at Figure 3:2) which presents the areas for Landscape Protection and Enhancement is generalised across the city and includes large swathes of both greenfield and urban land. It is also notable that there are a number of allocations in the Plan which are located along the River Wear Corridor and within the North and South Sunderland Sub Areas in particular which are also located within an area for ‘Landscape Protection and Enhancement’. As such there is no sound basis to exclude the site based on this plan.

The Landscape Character Assessment (at page 35) requires development to give consideration to the protection and enhancement of the landscape which can be achieved through good design and the appropriate response to the local townscape and landscape of the site and its surroundings. Development of the site would retain and enhance existing dense vegetation and landscaping including the landscape buffer (circa 40m) between the site and the A194(M).

The appended Landscape Appraisal includes the landscape analysis of the site submitted previously which demonstrates how the development proposals have responded to the local context and how long ranging views from Springwell Village towards Sunderland and Penshaw Monument would be designed into the development.

### Summary

- The reference to Springwell Village in Policy NE6 (Green Belt) is a legacy issue; the settlement is neither historic or a town and nor is there is any justification to give Springwell Village any specific protection on this basis.
- Springwell Village does not display a distinct or unified character and the character of the settlement cannot be described as special. Its core is relatively confined and dates to the late 19<sup>th</sup> Century with majority of the development reflecting post war expansion from the 1950s to the present day.
- The proposed development would not detract from or diminish the 19<sup>th</sup> Century core of the village and has been designed to respect the village townscape and make a positive contribution to it.
- The Council’s Green Belt Review is robust which concludes that the land parcel performs moderately against the five Green Belt purposes and, against purpose 4 (to preserve the setting and character of historic towns), that the development would result in a ‘minor impact which can be mitigated’.
- The site can be developed in a manner which would not bring about actual or perceived coalescence of Springwell Village with Washington.
- The Council’s Landscape Character Assessment requires development to give consideration to the protection and enhancement of the landscape which can be achieved through good design and the appropriate response to the local townscape and landscape of the site and its surroundings.
- It is evident from the Story Homes product that the development of the site will make a meaningful contribution to the delivery of ‘larger detached dwellings’ – which has been identified as a specific need for the City in Policy SS2.

- The comments provided by the Inspector [EX18.002] are no more relevant to the site than they are to the other allocations nearby on either side of the A194(M). As such there is no justification to delete HGA2 (and SS3).
- In light of the above, we consider that the basis on which the Inspector has arrived at the recommendation to delete HGA2 and the safeguarded land South East of Springwell is flawed, and unsound, and trust that the evidence provided in this response will be given due consideration.

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.

Our client requests that the proposed changes to Policy SS2 and HGA2 are reverted to retain East Springwell (and land South of Springwell in Policy SS3) as land to be removed from the Green Belt.



**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:

Date:

### **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



## CN 11 Countryside and Nature Conservation

11.20 The overall aim of the Countryside Commission's strategy is the creation of a sustainable and multi-purpose countryside. This is appropriate to the City's UDP and is encapsulated in Policy CN1 which seeks to protect the City's countryside from 'urbanisation', also for its own sake as advocated by PPG7. Strategic Guidance advises that policies for the countryside, including positive action to conserve and enhance its attractiveness and maintain and improve public access, should be an integral part of UDP's. The conservation and enhancement of the City's rural setting will also assist in presenting a positive, high quality image and identity which contributes to attracting inward investment and tourism.

11.21 The guiding principle in the wider countryside is that development should benefit the rural economy and maintain or enhance the environment. 'Urban' uses, such as housing or industry will not normally be appropriate in the open countryside. Appropriate new development - essential accommodation for farm workers, small scale buildings for leisure pursuits, etc. - should be sensitively related to existing settlement patterns and to the historic, wildlife and landscape resources of the City. The scale, detailing and the materials used in the construction of new buildings should respect surrounding existing development. Particular emphasis will be placed on ensuring that any development is appropriate - and well related - to its landscape setting; any development in outlying areas will be expected to retain a large measure of those landscape features which give value to the area e.g. tree and hedgerow cover, walls and other field boundaries, etc. Some operations (e.g. mineral extraction) will require a rural location and in such cases, where considered appropriate under Policies M1 to M3, it will be necessary to lessen the impact on the surrounding area for example by the incorporation of screening or appropriate heavy landscaping. This could mitigate both visual and aural aspects of this development.

11.22 Implementation of the particular elements will largely be achieved by exercising development control powers, but certain aspects may be brought about by Council financial assistance e.g. grants for listed buildings, or by the Council's management of land in its ownership. Other sources of funding could include the Countryside Commission and the National Rivers Authority.

### THE SUNDERLAND GREEN BELT

#### CN2 A GREEN BELT WILL BE MAINTAINED WHICH WILL:-

- (i) CHECK THE UNRESTRICTED SPRAWL OF THE BUILT UP AREA OF SUNDERLAND;
- (ii) ASSIST IN SAFEGUARDING THE CITY'S COUNTRYSIDE FROM FURTHER ENCROACHMENT;
- (iii) ASSIST IN THE REGENERATION OF THE URBAN AREA OF THE CITY;
- (iv) PRESERVE THE SETTING AND SPECIAL CHARACTER OF SPRINGWELL VILLAGE;
- (v) PREVENT THE MERGING OF SUNDERLAND WITH TYNESIDE, WASHINGTON, HOUGHTON-LE-SPRING AND SEAHAM, AND THE MERGING OF SHINEY ROW WITH WASHINGTON, CHESTER-LE-STREET AND BOURNMOOR.

11.23 The statutory Green Belt formed an integral part of the broad strategy of the County Structure Plan to restrain the further spread of the Tyneside/ Wearside conurbation, concentrating investment within the existing built-up area. Sunderland's Green Belt was intended to prevent the merging of Sunderland with Washington, Houghton-le-Spring and Tyneside. The Green Belt included in the Tyne and Wear Local Plan covered 3,750 hectares - almost two-thirds of the rural area. There was no Green Belt in County Durham, which had preferred to operate other countryside protection policies. However, the Regional Guidance for Durham, Cleveland and Northumberland (1993) suggested that Durham County Council should examine the case for an extension to the approved Tyne and Wear Green Belt to the west and south of the City Council area and this is included as a proposal in the County Council's Structure Plan review and in the proposed plans of both Durham City and Chester-le-Street.

11.24 DoE national guidance sets out the five main purposes of a Green Belt which are reflected and interpreted in this Policy. The note also stresses that the essential characteristic of Green Belts is their permanence and their protection must be maintained as far as can be seen ahead; once the general extent of a Green Belt has been approved it should be altered only in exceptional circumstances. Strategic Guidance states that the broad extent and purpose of the approved Tyne and Wear Green Belt remains valid and should be maintained. The Council will therefore continue to safeguard the statutory Green Belt defined in the 1985 Tyne and Wear Green Belt Local Plan with limited modifications to accommodate specific important material considerations/ uses. The broad extent of the Green Belt, however, remains valid and this is maintained.

11.25 Modifications to the Green Belt in the form of additions are particularly important where they reflect the changing circumstances since its approval in 1985. Since that date subsequent 'urban' development has reduced the separation between the built-up area of the City and neighbouring settlements in County Durham to the west and south. It is therefore considered that in order to prevent the coalescence of the City substantial additional

## CN 11 Countryside and Nature Conservation

areas of open land should be designated as Green Belt. This will complement the approach proposed by Durham County Council in its Structure Plan Review. The relatively small loss of Green Belt land (1%) elsewhere in the City (mostly for the purposes of urban regeneration) will be offset by these additions. The following modifications, which are detailed in the appropriate area chapters, are proposed to reflect changing circumstances in the City since 1986:-

### Additions

**South Hylton/ Claxheugh (2ha)** - consolidating the existing Green Belt, this addition will prevent the merging of Pallion and South Hylton

**East of A19 (306ha)** - this major addition will significantly enhance the separation of the built-up area of Sunderland with neighbouring settlements in Easington and also prevent encroachment on the countryside to the west of Cherry Knowle.

**Cut Throat Dene (2.5ha)** - this minor addition will 'round off' the existing Green Belt and assist in checking the spread of the urban area to the north.

**Washington Riverside (50ha)** - extending along the riverbank it will prevent the urban area sprawling into the river corridor and will complement the Green Belt on the adjacent river bank.

**Southern Area Playing Fields (19ha)** - complementing the proposed Durham County Green Belt, this designation, to the south of Bonemill Lane, will strengthen the separation between Washington and Chester-le-Street.

**Penshaw (84ha)** - the Green Belt will maintain the break between Washington (Mount Pleasant) and Houghton (Penshaw). To the west it will prevent the further urban sprawl of Penshaw.

**Herrington Colliery (8ha)** - taking in the area of the former colliery buildings which have now been cleared will add to the openness of the Green Belt between Shiney Row and east Herrington.

### Deletions

**West of Pallion (0.8ha)** - a minor amendment was required to allow the creation of a testing area necessary for the continued economic viability of the adjoining crane manufacturer.

**North Hylton Riverside (4ha)** - the Green Belt boundary has been amended to accommodate part of the Hylton Riverside development which is important to the regeneration of the riverside area.

11.26 The Green Belt is not all-encompassing, leaving land available in some fringe areas for necessary urban growth and regeneration during the Plan period. The proposed deletions from the existing Green Belt only total some 4 hectares and thus will not diminish its strategic value. An additional 463 hectares of land will be formally designated as Green Belt - a net gain of 12% - resulting in a Green Belt of almost 4211 hectares, i.e. almost 70% of the City's rural area. These additions will assist in strengthening the strategic aim of providing separation between settlements and assisting urban regeneration. The alterations to the Green Belt are detailed in the Area Proposals of this document and indicated in Fig.11.2.

**Table 11.1: Proposed Alterations to the Green Belt**

	Gains (ha)	Losses (ha)
North Sunderland	2.5	4
South Sunderland	308	<1
Houghton-Hetton	84	-
Washington	69	-
	<u>463.5</u>	<u>5</u>

SOURCE: Environment Department

11.27 Several small settlements are included within the Green Belt, e.g. Burdon and Offerton and will be subject to detailed criteria outlined in CN3. However, the large village of Springwell is excluded from the Green Belt and its more stringent controls so as to accommodate within its defined settlement boundaries, change appropriate to its size.

## CN 11 Countryside and Nature Conservation

11.28 Whilst effectively achieving the purposes of restricting sprawl and the merging of neighbouring towns the effectiveness of the Green Belt will not only depend upon the control of development in Sunderland but, in peripheral areas, on other adjacent local authorities retaining (or proposing) their own Green Belt and associated policies/ proposals. In particular, due to the narrowness of the gap between South Ryhope and the County boundary, the inclusion of a proposal in the Easington District Local Plan (Deposit version) for a Green Belt to the north of Seaham Grange supports the allocation within Sunderland at South Ryhope and will assist in the creation of a significant open zone between the two settlements.

CN3 THE CONSTRUCTION OF NEW BUILDINGS INSIDE THE GREEN BELT IS INAPPROPRIATE UNLESS IT IS FOR THE FOLLOWING PURPOSES:-

- (i) AGRICULTURE AND FORESTRY;
- (ii) ESSENTIAL FACILITIES FOR OUTDOOR SPORT AND RECREATION, FOR CEMETERIES, AND FOR OTHER USES OF LAND WHICH PRESERVE THE OPENNESS OF THE GREEN BELT;
- (iii) LIMITED EXTENSION, ALTERATION OR REPLACEMENT OF EXISTING DWELLINGS;
- (iv) LIMITED INFILLING IN, OR REDEVELOPMENT OF, EXISTING MAJOR DEVELOPED SITES IDENTIFIED ELSEWHERE IN PART II OF THIS PLAN;
- (v) THE EXTRACTION OF MINERALS PROVIDED THAT HIGH ENVIRONMENTAL STANDARDS ARE MAINTAINED AND THAT THE SITE IS WELL RESTORED IN ACCORD WITH POLICIES M8 AND M9;
- (vi) THE RE-USE OR CONVERSION OF AN EXISTING BUILDING PROVIDING THAT THE BUILDING IS OF PERMANENT AND SUBSTANTIAL CONSTRUCTION AND CAPABLE OF CONVERSION WITHOUT MAJOR OR COMPLETE RECONSTRUCTION AND IT DOES NOT HAVE A MATERIALLY GREATER IMPACT THAN THE PRESENT USE ON THE OPENNESS OF THE GREEN BELT. PROPOSALS SHOULD ALSO ACCORD WITH POLICY CN11.

11.29 Most of the aspects of this Policy reflect those of the 1985 Tyne and Wear Green Belt Local Plan. They also accord with PPG2 (1995). The City Council will impose strict controls on the nature and form of development within the Green Belt, in order to protect its purpose and character, whilst recognising the need to diversify the rural economy by encouraging its positive use. Control of development will seek to achieve the following objectives for the use of land in Green Belts:-

- \* to provide opportunities for access to the open countryside for the urban population;
- \* to provide opportunities for outdoor sport and recreation near urban areas;
- \* to retain attractive landscapes and enhance landscapes near to where people live;
- \* to improve damaged and derelict land around towns;
- \* to secure nature conservation interest; and
- \* to retain land in agricultural, forestry and related uses.

11.30 Within the Green Belt approval will not be given except in very special circumstances for the construction of new buildings or for the change of use of existing buildings for purposes other than agriculture, forestry, or other uses which preserve the openness of the Green Belt. Since its adoption in Sunderland (and generally within the County) it has effectively controlled inappropriate development (since 1986 in Sunderland only 11 approvals (totalling 36ha) have been given out of 40 submitted applications).

11.31 Inappropriate development is, by definition, harmful to the Green Belt, it is therefore for the applicant to show why permission should be granted. The 'very special circumstances' required to justify inappropriate development will not be considered to exist unless the harm (by reason of inappropriateness, and any other harm) is clearly outweighed by other considerations.

11.32 The following factors will apply to development in the Green Belt:-

**Agriculture and Forestry** - At present a wide range of agricultural and forestry developments do not require planning permission as they are 'permitted development'. In certain instances it may be necessary to withdraw their development rights when granting planning permission for new farm buildings so as to avoid a proliferation of buildings - particularly in locations where such development could have a detrimental effect on the openness of the Green Belt.

**Recreation and Essential Facilities** - Each application for essential facilities will be considered on its merits, bearing in mind the purposes of including land in the Green Belt, to establish whether or not any proposed building is genuinely required. In terms of outdoor sport appropriate facilities might include small changing rooms, small stables or unobtrusive spectator accommodation. Because of the size of the structures involved, major football stadia cannot be regarded as appropriate development within an approved Green Belt.

## Development Principles and Locational Strategy 2

**2.147** The challenge for the city-region is to maximise the tourist and business related offer through capitalising on opportunities such as a new major regional conference facility in Newcastle and a new World Heritage Site at Jarrow and Monkwearmouth, as well as improving links to develop the city-region as a comprehensive integrated visitor destination. Tourism centres such as NewcastleGateshead, Durham City, Whitley Bay and Seaham have good accessibility by a range of transport modes, and others such as Hadrian's Wall have benefited recently from bus-based schemes to improve access from surrounding urban centres. However, other tourist destinations such as Beamish, the rural countryside, and heritage coastal areas would benefit from improved public transport from a range of destinations within the city-region, to improve accessibility for tourists and assist wider social inclusion.

### Policy 9

#### TYNE AND WEAR CITY-REGION

Strategies, plans and programmes, and planning proposals should support the polycentric development and redevelopment of the Tyne & Wear City-Region by:

##### 9.1. Regeneration

a. giving priority to the regeneration of the following areas:

- the central parts of the Tyne River Corridor, extending over including the Bridging Newcastle Gateshead area, Newcastle City Centre, Teams, Gateshead Quays and town centre, and North Felling, both banks of the river Tyne including Hebburn, Jarrow, South Shields, Wallsend and North Shields, and the town centre of South Shields forming the Tyne Gateway, for appropriate mixed-use development;
- the River Wear Corridor in Central Sunderland;

b. ensuring a scale and quality of development to reflect Durham City's unique character and its role as a major service and employment centre for its surrounding hinterland;

c. supporting the regeneration and development of Amble, Ashington, Blyth, Cramlington, Chester-le-Street, Consett, Stanley, Crook, Seaham, Peterlee, Hetton-le-Hole and Houghton-le-Spring, for sustainable growth without adversely impacting on the regeneration initiatives within the Tyne and Wear Conurbation;

##### 9.2 Economic Prosperity

a. focusing the majority of new economic development on the city centres of Newcastle and Sunderland and the Key Employment Locations of West Hartford, Blyth Valley; Newcastle Great Park; Newburn Riverside, Newcastle; and Baltic Business Quarter, Gateshead (as set out in Policy 20);



## 2 Development Principles and Locational Strategy

- b. supporting the Science City Newcastle initiative, focusing development on the western area of Newcastle for science and technological development and developing a network of complementary nodes including Baltic Business Park, Gateshead; Northumbria University (Manors development); the Centre for Renewables, Blyth; Durham University and NetPark, County Durham;
- c. continuing to support the influential economic role of the four universities in the city-region, enabling better links between universities and business, and campus expansions where appropriate;
- d. focussing new knowledge based Small Medium Enterprise accommodation and offices within and adjacent to Newcastle and Sunderland city centres, with provision in regeneration centres and rural service centres to meet local needs;
- e. developing manufacturing and logistics based accommodation in line with Policies 18 and 20;
- f. focusing on the creation of local jobs and retraining and up-skilling of local workforces in the Other Regeneration Areas;
- g. broadening and better integrating the city-region's tourism offer by building on the success of the Newcastle-Gateshead Initiative including a major regional conference facility; sustainably developing the tourism potential of Hexham, Morpeth, Alnwick, Durham and the region's World Heritage Sites; and improving sustainable accessibility between tourist facilities and destinations;

### 9.3 Sustainable Communities

- a. supporting the integrated housing market renewal initiatives and programmes of:
  - 1. Bridging NewcastleGateshead, and Sunderland Arc areas, including large scale housing demolitions, and
  - 2. the SENNTRi area, Rural Coalfield Regeneration Area, and Durham Coalfield Communities Area, with particular emphasis on rebalancing the housing stock and meeting local housing needs;
- b. locating the majority of new retail and leisure development in the regional centre of Newcastle and the sub-regional centre of Sunderland. Additional development in other town centres should be consistent with their scale and function to maintain and enhance their vitality and viability;
- c. developing housing to support the economic growth strategies in sustainable locations, mainly on previously developed land in areas where it does not undermine existing housing markets, particularly housing market restructuring areas;

## Development Principles and Locational Strategy 2

d. encouraging high standards in the layout, design and energy efficiency of new development and redevelopment, which improve the quality of the environment and promote sustainability;

### 9.4 Connectivity

- a. strengthening international air connections from Newcastle International Airport, and encouraging the development of 55 hectares of undeveloped allocated land for airport-related uses (as defined in this RSS), to enable its potential as an economic driver to be realised and cater for its anticipated passenger growth;
- b. improving public transport links from throughout the city-region to Newcastle International Airport, and from Durham Tees Valley Airport to Durham City in particular;
- c. supporting the sustainable growth of the Port of Tyne, Blyth Harbour, Port of Sunderland and Seaham Docks, and ensuring good public transport links to the Port of Tyne are maintained to facilitate and cater for its passenger growth and tourism potential;
- d. promoting a further crossing of the River Wear and improved transport connections along the river in Sunderland;
- e. investigating the modernisation of the Metro system and improvements to the Newcastle/Gateshead Western Bypass; supporting improvements to the A19 junctions in North and South Tyneside and Northumberland;
- f. promoting the improvement of rail services between the two conurbations and to destinations outside the region, especially Edinburgh, Manchester, Leeds and London, particularly on the Durham Coast and East Coast Main Line.
- g. improving interchange facilities at the Strategic Public Transport Hubs of Newcastle, Sunderland and Durham City, particularly Newcastle Central Station;
- h. promoting bus based public transport improvements between the regeneration centres and Tyne & Wear and, for the longer term, investigating enhanced rail passenger services;
- i. protecting the Leamside rail line from development that would restrict its reinstatement in the longer term;

### 9.5 Green Belt

Ensuring that the Green Belt continues to safeguard the countryside from encroachment and check the unrestricted sprawl of Tyne & Wear.

The Green Belt should:

- a. prevent the merging of:
  - b. ○ Sunderland with Seaham, Houghton-le-Spring, Washington or Tyneside;
  - Gateshead with Hebburn, Washington, Birtley or Whickham;

## 2 Development Principles and Locational Strategy

- Washington with Chester-le-Street;
  - Newcastle upon Tyne with Ponteland, Newcastle International Airport, or Cramlington;
  - North Tyneside with Cramlington or Blyth; and
  - Durham City with Chester-le-Street.
- c. preserve the setting and special character of Durham City, Hexham, Corbridge and Morpeth;
  - d. assist in urban regeneration in the city-regions by encouraging the recycling of derelict and other urban land; and
  - e. maintain the broad extent of the Green Belt with detailed boundaries to be defined in relevant Local Development Frameworks, around Morpeth and the area to the north of Consett and Stanley and eastwards to Chester-le-Street.

### 9.6 Environment

- a. supporting the establishment of strategic networks of green infrastructure that links existing and proposed greenspace with green corridors running through urban, suburban and urban fringe areas to the countryside and coast
- b. subjecting development proposals in or likely to affect internationally designated sites of nature conservation importance and the Heritage Coast to rigorous examination;
- c. encouraging the development of renewable energy whilst carefully considering the local impacts of proposals.

## Tees Valley City-Region

### The City-Region

**2.148** The Tees Valley City-Region has a population of 875,000 people, almost half of whom live within the Teesside conurbation – Stockton, Middlesbrough and Redcar.

**2.149** The city-region displays a polycentric settlement pattern, based around the Conurbation, with the Main Settlements of Darlington and Hartlepool, the two “Other Regeneration Areas” of East Cleveland and Durham Coalfield Communities Area, and a rural hinterland, which contains market towns including Barnard Castle and Guisborough.

**2.150** At the centre of the Tees Valley City-Region lie the towns of Middlesbrough and Stockton. Middlesbrough is the largest retail centre in the Tees Valley and a major cultural and service employment centre serving the city-region. It also contains the University of Teesside and is developing its cultural role through the construction of the Middlesbrough Institute of Modern Art, the refurbishment of the Town Hall Complex and the creation of a digital multi-media cluster around ‘Digital City’. It has been designated as a Strategic Public Transport Interchange. It has potential to develop new city scale leisure, cultural, office and retail development in the town centre and Middlehaven.

# **LAND TO THE SOUTH EAST OF SPRINGWELL, WASHINGTON**

## **GREEN BELT AND LANDSCAPE APPRAISAL**

**ON BEHALF OF STORY HOMES AND MR NORMAN ELLIOT**

**Pegasus Group**



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## 1. INTRODUCTION

### 1.1 Scope of the report

1.1.1 This document has been prepared in response to the Main Modifications to the Sunderland Core Strategy and Development Plan, which respond to the Inspector's recommendation in his 'Post Hearings Advice – Main Modifications and Related Matters' of 22 July 2019 [Examination Ref: EX18.002] to retain this site (Policy Ref. HGA2 and SS3 in the Core Strategy and Development Plan 2015-2033, December 2018) in the settlement of Springwell Village in the Green Belt.

1.1.2 The Inspector's comments in relation to the Springwell site are set out in Box 1 below.

***HGA2 – East Springwell and Safeguarded Land south of East Springwell (Policy SS3)***

7. The Green Belt reports focus on the role of the Green Belt around Springwell in providing strategic separation between Washington and Gateshead, underplaying the role of the Green Belt in preserving the setting and special character of Springwell Village despite this purpose being expressly set out within Policy NE6. The combined site, in combination with land at Peareth Hall Farm and the Gospel Hall, forms a fundamental part of the gap between Springwell Village and the A194(M) and built up area of Washington. It also forms part of the landscape setting of the village, being within an area shown for 'Landscape Protection and Enhancement' in the Landscape Character Assessment.

8. I accept that the purpose of the land around Peareth Hall Farm and the Gospel Hall in preventing merging of settlements is weakened by the presence of buildings and other development. However, it is more open in character than the main built up part of the village and therefore still contributes to Green Belt purposes. For these reasons I recommend that HGA2 and the safeguarded land is deleted and the land together with that at Peareth Hall Farm and the Gospel Hall is retained as Green Belt (**MM**).

**Box 1 Extract of Inspector's Post Hearing Advice – Main Modifications and Related Matters (22 July 2019) [Examination Ref: EX18.002]**

1.1.3 This document reviews and sets out a response to these comments in relation to landscape and visual matters and comprises of the following key sections set out in Part 2- 'Response to the Inspector's Comments'.

- Green Belt policy and the separation of Settlements

- Preserving the Setting and Special Character of Springwell
- Landscape Character and the setting of the village.

## **1.2 Site location and context**

- 1.2.1 The site is located to the south east of the settlement of Springwell and to the west of the A194(M). It is formed of two pastoral fields, one long rectangular field to the south west, adjacent to the settlement edge and a triangular shaped field to the north east.
- 1.2.2 Both fields are laid to grass. Tree and hedgerow material is located to the perimeter of both fields and includes an approximately up to 40m deep band of mature roadside planting along the eastern boundary of the triangular field, which provides strong enclosure.
- 1.2.3 Running parallel to the north west perimeter of the site are Peareth Hall Road and Stoney Lane. Where the highway does not form the immediate north western boundary of the site, a series of properties and their associated gardens are located between the highway and the fields. The ground falls steeply away from the southern end of Stoney Lane, with levels ranging from approximately the 125m contour to the 105m contour in the lowest portion of the site adjacent to the A194(M).
- 1.2.4 Open and wide ranging views to the south and east are available from some parts of the footpath adjacent to Peareth Hall Road and Stoney Lane, (where not screened by intervening vegetation and existing properties adjacent to the northern boundary) including views of the Penshaw monument. These views are referenced and identified in the current local plan under Policy WA20 Views of the city under section c. 'Panoramic views south from Springwell Village'.
- 1.2.5 Views into the site and the adjacent existing residential edge are however very limited by a combination of existing built form, landform and existing vegetation. The main views of the site area are from locations along Peareth Hall Road and Stoney Lane to the immediate north west of the site. To the east, within the A194(M) corridor and further to the east views are heavily restricted by the road side vegetation adjacent to the motorway. To the south, views from a footpath between Springwell and Usworth, (now severed by the motorway) are limited by intervening landform.

## 2. RESPONSE TO THE INSPECTOR'S COMMENTS

2.1.1 The Inspector's Post Hearing Advice dealt with the land at Springwell under Sub Areas Matter 7, HG/A2 – East Springwell and Safeguarded Land South East of Springwell (Policy SS3). He recommended that the allocation of HGA2 and the safeguarded land be deleted and the land together with that at Peareth Hall Farm and the Gospel Hall be retained as Green Belt. He came to these conclusions primarily in relation to how the Green Belt preserves the setting and special character of Springwell Village; the role the land plays in providing a gap between Springwell Village and the A194M and Washington and the landscape setting of the village. In particular criterion (iii) of Policy NE6 (Green Belt) was considered to have been underplayed by the Council.

### 2.2 Green Belt Policy and the separation of settlements

2.2.1 Policy NE6 Green Belt of the Core Strategy and Development Plan 2015-2033 is set out in Box 2 below:

#### **Policy NE6 Green Belt**

- 1. The Green Belt (as designated on the Policies Map) in Sunderland will serve the following purposes:**
  - i. check the unrestricted sprawl of the built up areas of the city;**
  - ii. assist in safeguarding the city's countryside from further encroachment;**
  - iii. assist in the regeneration of the urban area of the city;**
  - iv. preserve the setting and special character of Springwell Village and Newbottle Village; and**
  - v. prevent the merging of Sunderland with Tyneside, Washington, Houghton-leSpring and Seaham, and the merging of Shiney Row with Washington, Chester-leStreet and Bournmoor.**
- 2. In assessing development proposals, development that is inappropriate in the Green Belt will not be approved except in very special circumstances.**
- 3. Development in the Green Belt may be permitted where the proposals are consistent with the exception list in national policy subject to all other criteria being acceptable.**
- 4. Proposals in the Green Belt for increased opportunities for access to the Open Countryside and which provide opportunities for beneficial use such as outdoor sport and recreation, appropriate to the Green Belt, will be encouraged where it will not harm the objectives of the Green Belt and recognise the important role of the Green Belt as a biodiversity resource.**

**Box 2 Policy NE6 Green Belt Sunderland Core Strategy and Development Plan 2015-2033 (December 2018).**



- 2.2.2 The primary purposes of Policy NE6 are related to the strategic function of preserving the separate identity of Sunderland and to prevent the merging of the City with nearby settlements. The Policy refers specifically to Sunderland and the first three criteria of the Policy and specifically refers to the 'City'. The Sunderland Green Belt also has some specific aims in relation to the separation of settlements and these are set out in criteria (iv) and (v). Para 10.33 in the supporting text of the Core Strategy Development Plan 2015-33 Publication Draft, (SD.1) notes that the Green Belt purpose in relation to Sunderland is to check the unrestricted sprawl of the existing built-up areas which has been mapped to show two main areas, the settlement areas of Washington, Springwell Village, Houghton Hetton and Shiney Row to the west and the main built up area of Sunderland to the east.
- 2.2.3 The aims of criteria (v) of the Policy is again concerned with the separation of settlements, firstly to prevent the merging of Sunderland with Tyneside, Washington, Houghton-le-Spring and Seaham and also preventing the merging of Shiney Row with Washington and Chester-le-Street and Bournmoor. In seeking to achieve these strategic aims, the Policy does not make any reference to the merging of Washington with Springwell. This may well be because the potential merging of Washington with Springwell, would not harm the strategic aims of the Policy with regard to Sunderland (its primary purpose), nor would it merge Washington with Gateshead and through that harm the strategic aims of the Policy.
- 2.2.4 It is clear from an analysis of the Policy and its underlying aims, that at a strategic level, the release of land at Springwell (HGA2 – East Springwell and Safeguarded Land South East of Springwell) could theoretically be achieved without undermining the purpose and aims of the Policy so far as the separation of settlements is concerned. The Inspector's comments rightly acknowledges that the general purposes of Green Belt in preventing the merging of settlements has already been weakened by development between Springwell and Washington along Peareth Hall Road adjacent to the motorway junction. Although it would not be unreasonable to suggest that coalescence or at least the perception of coalescence has already occurred at this location it is clearly an area of local sensitivity that needs to be appropriately addressed.
- 2.2.5 The Policy does make specific reference to Springwell at its criteria iv and this is in relation to the setting and special character of Springwell Village. The Sunderland City Council Green Belt Assessment (SD.30 Stage 1 updated and Stage 2, 2017) deals specifically with Springwell Village commencing at its Page 67 and states as follows:

***"The gap between Washington and Springwell Village is in places upwards of 400m in width but narrows to a point at Peareth Hall Road, where technically the two settlements are joined , only isolated from each other by the A194(M). This stretch of the A194(M) to the north west of Washington emphasises the feeling of separation between the two communities"***

and

***"As a whole, this section provides the entire strategic separation between Washington and Gateshead and provides a tight Green Belt boundary around Springwell Village, which was identified as the only 'historic town' specifically inset (or excluded) from Green Belt in the 1998 UDP. Whilst the prevention of the city merging with Gateshead is a clear priority in Green Belt terms, the tight boundary encompassing Springwell Village should be considered in a wider context, particularly in ensuring that the village has the potential to retain its distinctive identity and its local facilities over the next 20 years.***

- 2.2.6 It is clear from the Green Belt Assessment that the City Council has appropriately considered the land at Springwell (Parcel SP15) in relation to its contribution to Green Belt purposes and that in doing so they specifically addressed the issue of preserving the special character of Springwell Village. (It is noted that the NPPF refers to 'preserving the setting and special character of historic towns' and that as a village Springwell does not fit with this criteria.) The summary conclusion set out on page 149 of the document states that overall this land parcel performs moderately against the 5 Green Belt purposes, but it is of note that its level of contribution for purpose 4, "Preserving the setting and Special Character of Springwell Village is assessed as 'B', set out in the methodology as 'minor impact which can be mitigated'. Landscape mitigation measures are built into the landscape framework, (discussed in Section 2.5 below) to address the setting of the village within the proposed layout.
- 2.2.7 The City Council in assessing and evaluating the site acknowledged in its high level Strategic Housing Land Availability Assessment (SHLAA) analysis from, (SD.30 Stage 1 updated and Stage 2, 2017) that the land contributed to some degree to Green Belt as expressed by the Policy Criteria 1-5 used in the analysis. On this basis it was on Green Belt grounds given a red for this issue, i.e. High Impact – significant mitigation required and with an overall appraisal as not being suitable for developments. However, further more detailed analysis in relation to the Green Belt considerations led the Council to conclude that part of the land at Springwell could be developed with no more than a moderate impact to the Green Belt.

- 2.2.8 It is clear from an analysis of the aims and purposes of the Policy that it is in relation to preserving the setting and special character of historic towns that this land has been included in the Green Belt and not in relation to the issue of coalescence. The removal of this land from the Green Belt would not lead to coalescence and it therefore remains to be considered whether the issue of preserving the setting and special character of Springwell has been given appropriate consideration. We agree with the Council's judgement in this regard and note again that Springwell Village is not a Historic Town.
- 2.2.9 The Inspector's comments did not expressly disagree with the Council's assessment of the land's performance against the five National Planning Policy Framework (NPPF) (2012) Paragraph 79, Green Belt purposes other than with regard to purpose 4 (preserving the setting and special character of historic towns). With regard to this criteria he considered that the appraisal of a minor and mitigatable effect underplayed the role of the Green Belt at Springwell in this regard. However, an analysis of the historic character of Springwell, its relationship to this land and the impact that its development and removal from the Green Belt would have on the 19<sup>th</sup> Century core of the village supports the Council's analysis. This is explored further in Section 2.3 below.
- 2.2.10 The combined attributes of the site area, particularly in terms of topography and screening, (both from existing vegetation and built form) result in the perception of the actual physical gap between Springwell and the A194(M) being narrower than may be the case on plan. The following photographs illustrate that direct views over the site area towards the motorway are limited and not complete along the whole length of the adjacent roads. The key and more open viewpoints from the northern site boundary, where available, have also been retained and integrated into the landscape framework as discussed in section 2.5 below.



**Figure 1 View from Heugh Hill looking south west.**

- 2.2.11 The larger triangular portion of the site area, in the photograph at figure 1 above, appears only as a thin line of light green to the east of the intervening cottage. The mature tree planting beyond the site area is in part the structure planting adjacent to the motorway and further, more extensive vegetation beyond on the east side of the motorway. This vegetation provides strong visual separation from the motorway and the wider built form of Washington on the horizon.



**Figure 2 View south east from Peareth Hall Road towards A194(M)**

2.2.12 The photograph at Figure 2 illustrates in the foreground the view over the western section of the triangular parcel of land. The site area drops away to the south towards the intermittent boundary hedgerow. Scrubby vegetation and the landform beyond the site area, (marked by the heathy vegetation) provide strong separation from the Motorway.





**Figure 3 View from Stoney Lane looking south east from near Winston Court**

- 2.2.13 The photograph at figure 3 looking over the narrower section of the site area to the west shows how intervening vegetation, on both the northern and southern boundary restricts views beyond the site area over the intervening field towards the motorway.

## **2.3 Preserving the Setting and Special Character of Springwell**

### **Historic development of Springwell**

- 2.3.1 Analysis of historic mapping of the village of Springwell reveals a settlement that has largely evolved and grown almost entirely over approximately the last 120 years and more specifically in the second half of the 21<sup>st</sup> Century. The 1862 OS mapping, (see Figure 4 below) illustrates the settlement area of modern Springwell as lying within an area named as Usworth Common to the west of the village of Great Usworth. Usworth House on Heugh Hill and its associated gardens and parklands lies between Usworth Common and Great Usworth. This land lies to the north of the site area and forms the modern footprint of the village of Springwell. References to the name 'Springwell' at this stage refer to Springwell Quarry and Springwell Colliery, Springwell House and the actual 'Spring Well' to the north west. Very little associated housing is apparent at this stage beyond

Usworth House, (now no longer remaining) and two rows of housing within the Common area at Red Row, Lightpipe Row, Further quarries are also apparent within the Common.



Figure 4 Extract of the 1862 OS map

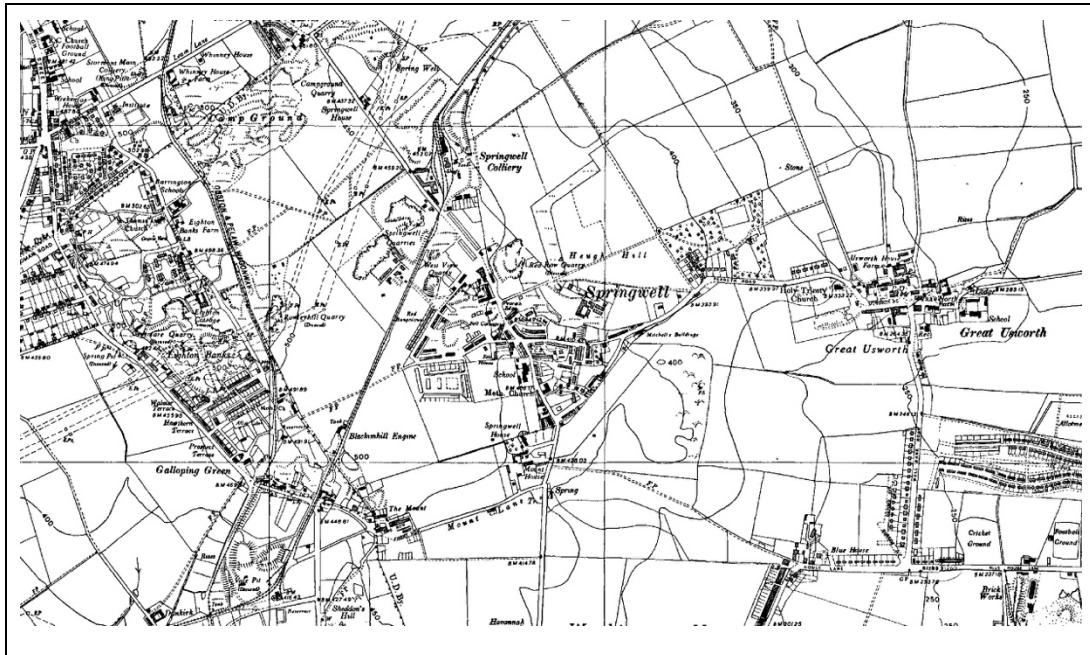


Figure 5 Extract of the 1898 OS map

2.3.2 The 1898 OS Map shows that building of individual properties has begun to take place within the triangular shaped former common area defined by Stoney Lane, Peareth Hall Road and Springwell Road to the West. Further terraced development continues northwards along Springwell Road connecting the developing settlement to Springwell Colliery. A Methodist Church has also been constructed

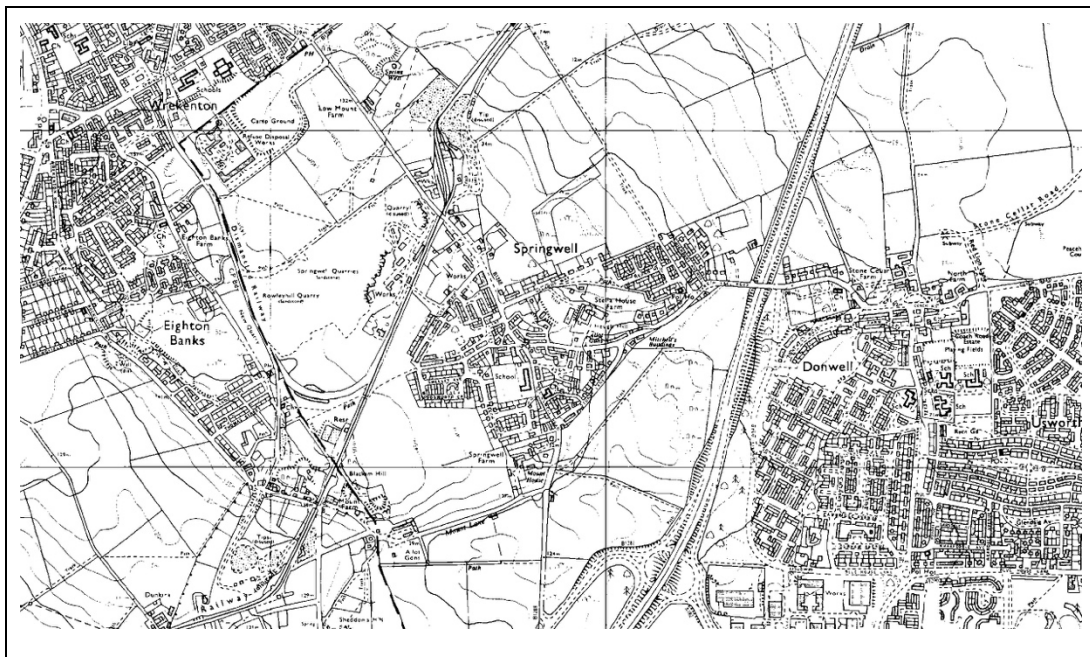


in this area by this date and a school appears on the 1921 edition of the map. These areas form the 19<sup>th</sup> Century core of Springwell.



**Figure 6 Extract of 1951 OS Map**

2.3.3 By 1951, as shown in the extract at Figure 6 above, largely post war development has continued to infill between the individual properties within the triangular core of the settlement. Further development has also begun to take place to the east of the main part of the early settlement, largely within the former estate land of Usworth House and the associated Parkland.



**Figure 7 Extract of 1978 OS Map**

- 2.3.4 The A194(M) to the east of the site area was built in the early 1970's providing physical separation between Springwell and Usworth. Development of the former estate land of Usworth House has continued along with further consolidation of the settlement to the west.
- 2.3.5 It is noted that there are not any designated Conservation Areas within Springwell which would suggest a lack and quality of historic character needing protection.

### **Character of Springwell Village**

- 2.3.6 Springwell is a village which has a late 19<sup>th</sup> Century core characterised by buildings built using the local sandstone. The character of these buildings is distinct from the greater part of the village which is made up of buildings and developments reflecting the post war expansion of Springwell from primarily from the 1950s to the present day. Taken as a whole, the village does not display a distinct or unified character and the character of the village cannot be described as special. The later 19<sup>th</sup> Century core is quite small in relation to the overall scale of the settlement and lies along a triangle of roads at the western extension of Peareth Road. This includes the stone-built properties at the western end of Stoney Lane and along Springwell Road and is particularly well expressed along the western end of Peareth Road. Much of Stoney Lane, adjoining the proposed development site is comprised of low density modern development, (largely post 1950's) which is distinct from the late 19<sup>th</sup> Century core and more typical of the post war village character.
- 2.3.7 The proposed development will not detract from or diminish the late 19<sup>th</sup> Century core of the village and has been designed to respect the village townscape and make a positive contribution to it. The historic core of the village does not derive its contemporary character from its relationship with the surrounding landscape and is largely inward looking. Although the late 19<sup>th</sup> Century village would have been closely related to its local landscape, being located on the slopes of a local sandstone ridge, and largely built from quarries located on the ridge this relationship has already been significantly diminished by subsequent modern development lying along or around its outer edges. The settlement is primarily characterised by a palimpsest of later development of many styles and ages, that create the overriding character of Springwell. The development of the land to the south east of Peareth Road will not encroach on or substantially alter the vernacular architecture of the historic core of the village as expressed in the Landscape Character Assessment.

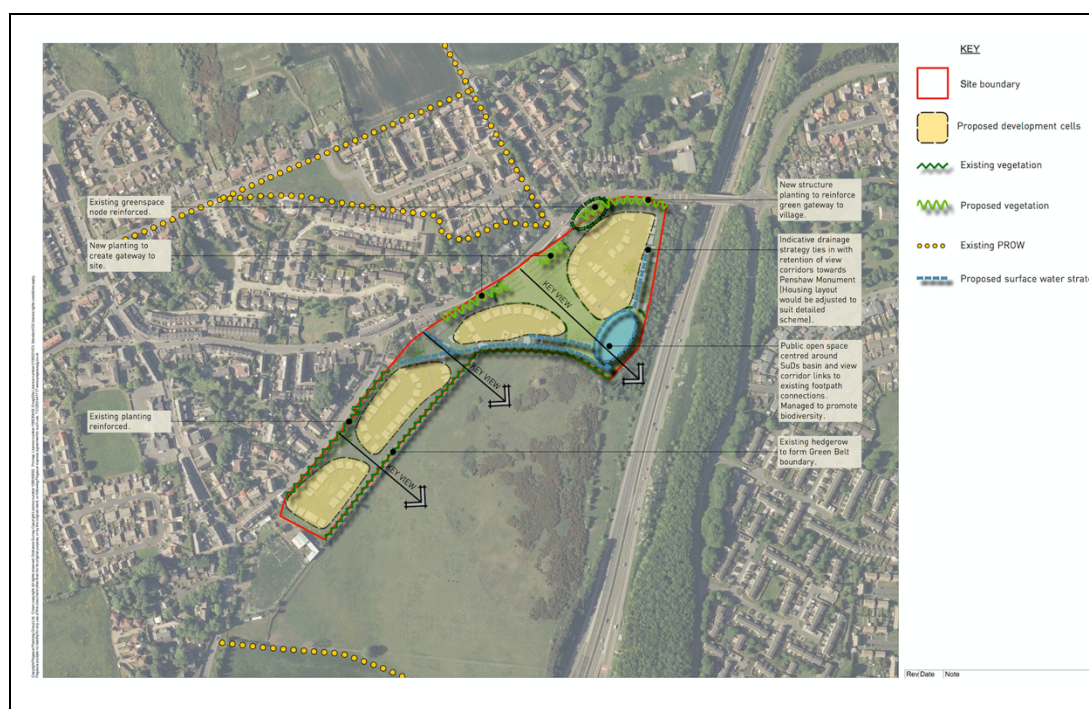
## 2.4 Landscape Character and the setting of the village

- 2.4.1 ...The landscape character of Springwell and the surrounding landscape is presented in the City of Sunderland Landscape Character Assessment. Springwell is located in Landscape Character Type 1 Coalfield Ridge within which there is one Landscape Character Area - 1a Springwell Rise. This area is described as being located in the far north west corner of the Sunderland City Council area. This area includes a large general area of land identified for enhancement and protection. The site area is not noted in the assessment for any particular significance, a photograph in the document illustrating panoramic views over Sunderland is taken from a viewpoint to the north of Springwell and does not include the site area. Springwell is noted in the document in terms of the distinct sandstone buildings, built with material from the Springwell Quarry which are mostly located within the village core.
- 2.4.2 The Character Area 1a Springwell Rise is identified as an 'Area for Landscape Protection and Landscape Enhancement' in the Landscape Character Assessment as shown on Figure 3.2 of the Assessment, (and to be replicated at Appendix 3 of the Core Strategy and Development Plan). It is noted that other sites for development release lie within areas for 'Landscape Protection and Enhancement' and indeed within areas of 'Landscape Protection' only, (equating to areas of higher landscape value in the City of Sunderland), for example, within the River Wear corridor.
- 2.4.3 In terms of landscape enhancement and the elements highlighted in the assessment as forming part of this aim, development of the site would still retain a largely undeveloped area surrounding the settlement. The site would not have an impact on recreational routes linking Springwell with Washington and Gateshead. Further tree planting within the site would help to further integrate the A194 enhancing the visual break between Gateshead and Washington.
- 2.4.4 In terms of landscape protection and the elements highlighted in the assessment as forming the key part of this aim, the most open portions of the site would be protected with retained view corridors allowing views out over the wider landscape. The Bowes Railway scheduled monument located to the north west of the village does not have a physical or visual relationship with the site. The sandstone vernacular of the village could be used in part as a design reference within the proposed properties and boundary features.



### **Proposed Landscape Framework**

2.4.5 It is acknowledged that the elevated nature of the site and the panoramic views gained from some sections of the adjacent Peareth Hall Road and Stoney Lane on the northern boundary provide one of the key landscape constraints highlighted in the opportunities and constraints analysis undertaken during the early stages of the site promotion. This has been addressed in the indicative site layout plan which maintains strong view corridors across the site, the open fields beyond and the wider landscape panoramic to the south east. Proposed development is also set back from the north western boundary and onto the lower slopes of the site area to maintain views over the site from existing properties to the north west, on higher ground.



**Figure 8 Extract of Proposed Landscape Framework Plan**

2.4.6 Another key observation during the site analysis work was the consideration of the eastern gateway into the village from the bridge over the A194 motorway. Existing development lies on the northern side of the road including Peareth Hall Farm and the Gospel Hall, this development includes large trees which contribute positively to the 'green gateway' as does a boundary wall constructed out of the local sandstone. On the southern side of the road vegetation on the motorway embankment complements the large scale trees amongst the development to the north, this continues in part along the site boundary. The landscape framework

shows this existing vegetation reinforced along Peareth Hall Road to contribute further to the green gateway to the village. This would be of sufficient depth to partially screen proposed development to the south and balance the existing development to the north around the Gospell Hall.

- 2.4.7 The existing, mature buffer vegetation adjacent to the A194(M) and the eastern boundary forms a strong Green Belt boundary and provides strong separation between Springwell and Washington. This strong, dense band of mature vegetation lining the road also continues to a greater width on the eastern side of the motorway. In terms of coalescence, the existing relationship between built form on the northern side of the motorway overbridge, (which between the south eastern corner of the Gospell Hall and the westernmost residential property between the roundabout junction of Peareth Hall Road and Stone Cellar Road to the east of the A194(M) is approximately 100m) would not be reduced by development to the south within the proposed site area. The closest distance between the eastern site boundary and existing properties on Doncrest Road to the east of the A194(M) is approximately 150m. Further development to the north of Doncrest Road northwards towards Peareth Hall Road is unlikely due to the intervening land comprising of further structural highway planting to the east of Donvale Road and the large cemetery area of Usworth Parish Church
- 2.4.8 The proposed development parcels are broken into four low density areas separated by view corridors, quality open and recreational space including suds basins. All properties would be outward facing on the northern and southern edges to complement the existing street scene and a positive new residential edge to the south. The built form would draw on the historic core of Springwell for design cues particularly in terms of the use of local stone, where appropriate, to tie the new properties into the strongest parts of the existing village fabric.
- 2.4.9 The proposals respond to the guidance and strategy for the area set out in the 2015 City of Sunderland Landscape Character Assessment and in terms of the overarching strategy of landscape enhancement and landscape protection.

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### 3. SUMMARY AND CONCLUSIONS

3.1.1 Having reviewed the Inspector's post hearing advice and considered this in context of the land at Springwell's role in relation to landscape and townscape matters, we have come to the following conclusions;

- i. The proposed development can be accommodated on the land to the South East of Peareath Road Springwell without conflict with the strategic aims of Policy NE6 with regard to coalescence and the separation of settlements. The land can be developed in a manner which would not bring about actual or perceived coalescence of Springwell with Washington, nor would it contribute to the presence of built form at the Gospel Hall.
- ii. The land does not form a setting to the village in views from the wider countryside or from the local townscape and the character of the village is not dependent upon or significantly characterised by views of the village seen in the context of this land.
- iii. The land does not make any significant contribution to maintaining or preserving the character of the late 19<sup>th</sup> Century core of the village when considered in the context of an appropriate analysis of the village townscape and character. That part of the village which displays a more intact and homogeneous character and might be considered to have the special character expressed by policy NE6 linked to historic development, lies at the western end of Peareath Road and the Western end of Stoney Lane and along Springwell Road it is connected along a triangle of roads to the east of the school and the Methodist church. The developments will not diminish or undermine this character and through good design will make a positive contribution to the settlement
- iv. The proposed development will respect the character and setting of the village and has been designed specifically to do so. It is low density development which will have an appropriate village character with well sited open space and the landscape structure that responds to its specific locality on the edge of Springwell.
- v. The proposals respond appropriately to the landscape character assessment which requires development to give consideration to the protection and enhancement of the landscape. This has been achieved through good design and the appropriate response to the local townscape and landscape of the site and its surroundings

# 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.

The Schedule of Main Modifications, Sustainability Appraisal Addendum and supporting documentation are available to view at the examination webpage at [www.sunderland.gov.uk/csdpeip](http://www.sunderland.gov.uk/csdpeip)

Copies of the Schedule of Main Modifications, Sustainability Appraisal and supporting documentation are also available to view at Sunderland Civic Centre, Burdon Road, Sunderland SR2 7DN during normal opening hours (8.30am to 5.15pm Monday to Thursday, and 8.30am to 4.45pm on Friday) and at all Council Libraries.

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		Neil Westwick
Organisation/Group	Story Homes and Mr Michael Ford	Lichfields
Address Line 1	██████████	██████████
Address Line 2		██████████
Town/City		██████████
County		██████████
Post Code		██████████
Telephone no:		██████████
Email:		██████████

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

Main Modification Reference	MM
MM5	Policy SS2 (HGA4)

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

We respond on behalf of our client Story Homes and Mr Michael Ford in relation to Policy SS2 and HGA4 (North of Usworth Hall).

MM5 includes a series of modifications to Policy SS2 and this response relates only to those associated with HGA4 (North of Usworth Hall). These include modifications to the list of development requirements and to the extent of the site allocation and Green Belt release (Figure 19).

Whilst our client generally welcomes the majority of the changes, we consider that some further modifications are needed to ensure that Plan is effective in this regard. In terms of the list of development requirements, we request the following revision to subpoint v:

“ ...

*v) incorporate greenspace/green infrastructure ~~east~~ **within the eastern part** of the site ~~area~~ to provide a buffer to the former Leamside Lane, address flooding associated with the Usworth Burn and to minimise impact on priority species and protected habitats;...”*

This change is required so that the requirement is clear and to ensure the Plan is effective.

We also note the modification to Figure 19 (and the Policies Map) which include a change to the site allocation boundary and the area to be released from the Green Belt. Whilst we recognise that the allocation has been increased, it would be logical to define the boundary on the full site area within our client’s control which is defined by the former railway.

In extending the red line, this would also include the Public Right of Way (PRoW) which falls within the land within our client’s control. As subpoint iii requires the protection/enhancement to a Right of Way, by extending the site allocation boundary, this would facilitate enhancements to the existing PRoWs to the south and east of the site and the connectivity between each route.

For ease of reference, we append a plan which identifies the requested change to Figure 19. This change should also be reflected on the Policies Map.

We consider that the above changes are needed to make the Policy effective.

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.

As explained in our client's response to Question 5, we request the following change to HGA4, subpoint v:

“...  
v) incorporate greenspace/green infrastructure ~~east~~ **within the eastern part** of the site ~~area~~ to provide a buffer to the former Leamside Lane, address flooding associated with the Usworth Burn and to minimise impact on priority species and protected habitats;...”

We also append a plan which shows a requested change to the allocation boundary. We request that Figure 19 and the Policies Map are amended to reflect this change.

We consider that the above changes are needed to make the policy effective.

**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:

Date:

### **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







**Key**

Proposed allocation boundary



Suggested revision



HGA4

# LICHFIELDS

Project North of Usworth Hall

Title **HGA9 - Proposed boundary revision**

Client Sunderland City Council

Date October 2019

Scale NTS

Drawn by TB

Drg. No. GRA/NE/23059/06



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## Comment

<b>Consultee</b>	Bradley (1229731)
<b>Email Address</b>	[REDACTED]
<b>Company / Organisation</b>	Sunderland Green Party
<b>Address</b>	[REDACTED] [REDACTED] [REDACTED]
<b>Event Name</b>	Core Strategy and Development Plan - Main Modifications
<b>Comment by</b>	Sunderland Green Party ( Bradley - 1229731)
<b>Comment ID</b>	MMC20
<b>Response Date</b>	24/10/19 19:10
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Files</b>	SGP Core Strategy objection.docx

**Which Main Modification does your representation relate to?** ALL

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

Both Sunderland City Council and the Government have declared a Climate Emergency, by ignoring national and local guidance the plan is open to legal challenge.

**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.**

The plan should be subject to a proper climate impact assessment and amended accordingly. This is particularly relevant to any areas of green space threatened with development.

**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.**

The Sustainability Appraisal states objectives on climate change, and fails to assess any of the elements of the plan against them. At a time of climate crisis this is unacceptable.

**Please attach any additional documents you wish to submit. If you have any issues please send to [planningpolicy@sunderland.gov.uk](mailto:planningpolicy@sunderland.gov.uk)** SGP Core Strategy objection.docx

I wish to object to the amended version of the Local Plan incorporating the major modifications proposed by the government inspector on the grounds that it is not legally compliant in that it ignores the instructions of the council.

On Wednesday 27th March Sunderland City Council unanimously passed a motion declaring a climate emergency, this means they are committed to examining everything they do through the lens of the climate crisis. This is local democracy in action, the councillors have given the council and its officers a clear instruction as to the expected level of attention they must give the climate crisis. By failing to do so in the ongoing evolution of the Local Plan both the council and the inspector have not complied with a binding motion agreed in council and therefore the plan is open to legal challenge.

The full wording of the motion was “In recognition of the threat posed to our environment by climate change Sunderland council will declare a climate emergency. Numerous local authorities around the country have declared climate emergency and it is important for the council to show it takes the issue seriously. Recent weather and changes in ecosystems show that we are already seeing changes as a result of climate change so it is important to join other councils in giving the issue suitable attention and clearly setting out how we will meet our targets on cutting emissions”

The key phrase is ‘giving the issue suitable attention’ and all council actions from this date should do so. The preparation and public examination of the Local Plan falls within this remit yet there is no evidence of the climate crisis being considered in any of the documents.

It is to be expected that having declared an emergency the council would review all of its plans to ensure they did not exacerbate the emergency and were compatible with the actions necessary to reach a low/zero carbon future. Not only has the plan as presented not been reviewed but the main modifications proposed by the inspector do not take into account the emergency.

The Sustainability Appraisal Addendum – SA of Main Modifications produced for Sunderland City Council by Peter Brett associates. has as its Sustainability Appraisal Objective for Climate Change – “To minimise greenhouse gas emissions and adapt to the effects of climate change”. This objective has not changed since the declaration of climate emergency indicating that the direction given to Peter Brett associates had not been updated despite the change in council policy. The council declared an emergency, an emergency demands immediate action, and something as important as the Local Plan which will drive development in Sunderland for the over a decade must acknowledge and reflect this. The stated objective does not.

The guide questions and indicators for the objective are set out on pages 23 and 24 of the document, however the objective is not actually assessed.

Pages 28 and 29 detail the assessments for housing growth areas, objective 12 Climate Change is not mentioned

Page 30 details the assessments for Proposed Key and Primary Employment area, objective 12 Climate Change is not mentioned.

Page 31 details the assessments for TSGT sites, objective 12 Climate Change is not mentioned.

Therefore, not only has the council failed to update the objective in line with the declaration of Climate Emergency but they have also failed to actually measure or take into account the impact on the climate of their plans. This is not consistent with the motion passed in council.

The climate crisis is not restricted to the extremes of weather we will encounter but also its impact on our environment and way of life. Crops died out in the fields of France this year as record temperatures hit, a warning sign that food production is threatened and increasing the importance of protecting farmland. Apart from providing food, green spaces are essential for wildlife and insects, stressed by the changing climate, to survive; our best form of carbon capture to ameliorate the crisis; and give a cooler environment for people to escape to as the built-up environment heats up. Therefore, decisions made to amend the greenbelt to allow housing must take in to account the climate crisis.

The Committee on Climate Change recommended that local authorities concentrate efforts in areas where they can have significant influence, namely “in buildings, surface transport, and waste” and Friends of the Earth produced a briefing paper to help councils abide by declarations of a climate emergency. The priority action for councils is to stop promoting measures that increase greenhouse gases – for example increasing road capacity.

This plan includes a major road network in the city, houses built in locations that encourage car use and a reliance on the automotive industry to drive economic growth, none of which have been reviewed through the lens of the climate crisis nor has their carbon footprint been evaluated. The council cannot ignore the motion it passed nor can it hide behind the new Carbon Plan that is in production.

A declaration by the council must carry legal force and organisations such as Client Earth are committed to making councils live up to their obligations by challenging them in court. If this plan is passed as amended without reference to the declaration of a climate emergency, it is open to legal challenge. If Sunderland Council are to abide by the motion and ‘give the issue suitable attention’ they must halt the process, conduct a proper assessment of its impact on the climate and bring forward a revised plan appropriate to the emergency we are in.

Richard Bradley

On behalf of Sunderland Green Party



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 Sunley, D.1136646, MMC177 Council and the  
Planning Strategy and  
Development Plan process.

Name..... David Sunley .....

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

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.

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.

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.

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.

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,

