



Core Strategy and Development Plan

Report of Representations for Main Modifications – T, V, W, Y & Unduly Made Representations

November 2019

SUNDERLAND LOAL PLAN CSDP – MAIN MODIFICATIONS CONSULTATION

REPORT OF REPRESENTATIONS – T, V, W, Y & UNDULY MADE REPS

CONTENTS

Reference	Page No.
Taylor,G.950929,MMC23	4
Taylor,J.1174532,MMC16	5
Taylor,L.1137203,MMC24	6
TaylorWimpey,1120527,MMC129	7-15
TaylorWimpey,1120527,MMC130	16-24
TaylorWimpey,1120527,MMC132	25-33
TaylorWimpey,1120527,MMC133	34-42
TaylorWimpey,1120527,MMC135	43-52
TaylorWimpey,1120527,MMC136	53-61
TaylorWimpey,1120527,MMC137	62-70
TaylorWimpey,1120527,MMC138	71-79
TaylorWimpey,1129527,MMC139	80-88
Thirlaway,FJ.954701,MMC211	89
Thirlaway,I.954702,MMC215	90
Thornley,M.1130872,MMC174	91
Trehwitt,J.953578,MMC217	92
Trehwitt,M.953579,MMC218	93
Trotter,L.1174688,MMC363	94
Turnbull,J.953597,MMC154	95
Turnbull,M.1133142,MMC155	96
Vorley,C.953263,MMC353	97
Wales,M.1134267,MMC17	98
Walker,GA,1115084,MMC71	99-101
Ward,C.950876,MMC312	102
Ward,WJ.950872,MMC314	103
Watson,D.1174190,MMC352	104
Watson,H.953758,MMC366	105
Watson,JW.953762,MMC364	106
Watson,M.949745,MMC146	107
Watson,V.1174195,MMC350	108
Weatherburn,M.1134026,MMC29	109
Weatherburn,P.953911,MMC30	110
Weddle,M.1124872,MMC18	111
Weir,D.953844,MMC268	112
Weir,H.953843,MMC269	113
Whitfield,D.953686,MMC294	114
Whitfield,F.953687,MMC292	115
Whittaker,M.953683,MMC159	116
Wilkinson,J.1133257,MMC254	117
Wilkinson,P.1133200,MMC257	118
Williams,B.1135019,MMC299	119
Williams,S.1135015,MMC304	120
Wood,C.950837,MMC237	121
Wood,D.950854,MMC334	122
Wood,J.953946,MMC336	123
Wood,M.1229879,MMC361	124

Young,HC.1134790,MMC184	125
Young,J.953616,MMC266	126
UNDULY MADE REPRESENTATIONS	127
McCaffrey,D.1132588	128
McCaffrey,J.1104833	129
NaturalEngland,433172	130
Urwin,C.1174149	131

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

15 October 2019

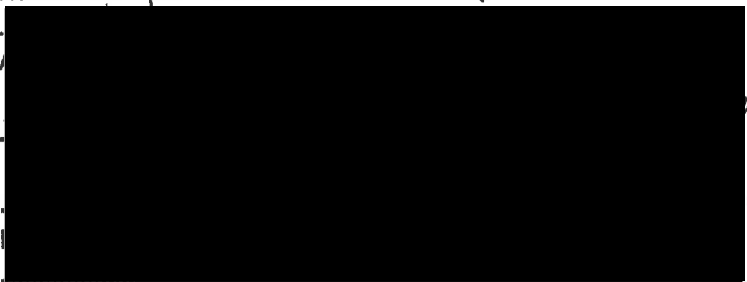
Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

15 OCT 2019

I agree to [Taylor, G.950929, MMC23] Council and the
Planning In [Taylor, G.950929, MMC23] strategy and
Development Plan process.

Name GORDON TAYLOR



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



TAYLOR, G.950929, MMC

PLEASE SIGN THIS LETTER, COMPLETE THE CONTACT BOX, AND RETURN TO THE COMMUNITY VENUE (BY 23RD OCTOBER), or post it directly to the Council (addressed to Taylor, J. 1174532, MMC16) COMMUNITY EACH PERSON IN EVERY HOUSEHOLD SHOULD COMPLETE A SEPARATE LETTER BELOW

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

15 October 2019

Dear Sirs

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

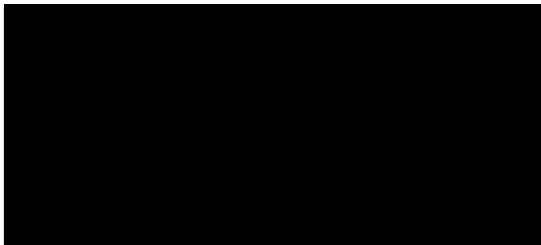
Name..... MRS JEAN TAYLOR
Address.....
.....
.....
Postcode.....
.....

CORE STRATEGY AND DEVELOPMENT PLAN

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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 agree to my data being used by Sunderland Council and the
Planning Taylor, L. 1137203, MMC24
Development Strategy and

Name LYNN TAYLOR

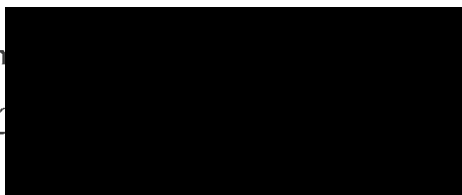


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Yours faithfully



TAYLOR, L. 1137203, MMC

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

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	Taylor Wimpey	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 (Taylor Wimpey) 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

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

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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;
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- **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.

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	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Taylor Wimpey	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 Taylor Wimpey 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 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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Signed:

Date:

Completed forms should be returned to:

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Core Strategy and Development Plan 2015-2033

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- **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.

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1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Taylor Wimpey	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	<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 (Taylor Wimpey) 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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Signed:

Date:

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Core Strategy and Development Plan 2015-2033

Proposed Main Modifications Consultation Comment Form



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1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	Taylor Wimpey	██████████
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 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 Taylor Wimpey 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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Organisation/Group	Taylor Wimpey	██████████
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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 Taylor Wimpey 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) [EX3.013], 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

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Organisation/Group	Taylor Wimpey	Lichfields
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Address Line 2		██████████
Town/City		██████████
County		██████████
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
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We respond on behalf of our client Taylor Wimpey 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.

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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



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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 (Taylor Wimpey) 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**.”

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.

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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 (Taylor Wimpey) 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, Taylor Wimpey 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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N/A

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Core Strategy and Development Plan 2015-2033

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Email:		██████████

2. Which Main Modification does your representation relate to?

Main Modification Reference	MM
MM12	Policy SS7 (HGA9)

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 Taylor Wimpey in relation to Policy SS7 and HGA9 (Penshaw).

MM12 includes a series of modifications to Policy SS7 and this response relates only to those associated with HGA9 (Penshaw). These include modifications to the list of development requirements and to the extent of the site allocation and Green Belt release (Figure 30).

The modifications reflect the discussions between the various parties during the relevant hearing sessions and our client therefore welcomes the modifications. As such, we consider the modifications to be sound.

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

N/A

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Signed:

Date:

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

Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
City Centre
Sunderland
S1 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.
Thirlaway, FJ.954701, MMC211

Name MR. F. J. THIRLAWAY
Address [REDACTED]
Postcode [REDACTED]

Welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell
the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications
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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
City Centre
Sunderland
S1 7DN

25 OCT 2019

October 2019

Dear Sirs

GREEN BELT STRATEGY AND DEVELOPMENT PLAN

Thirlaway, I.954702, MMC215

Name: MRS. I. THIRLAWAY

Address: [REDACTED]

Postcode: [REDACTED]

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

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Yours faithfully,

[REDACTED]

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

25 OCT 2019

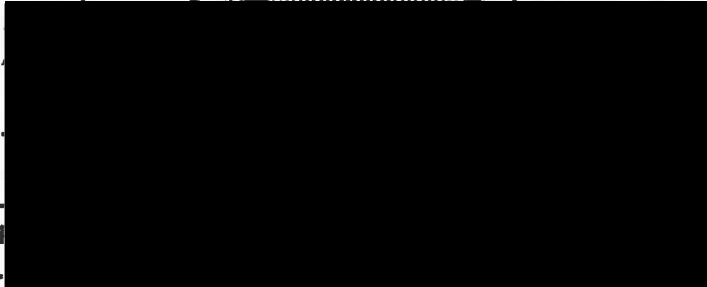
October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used for the Core Strategy and the
Planning [Thornley, M. 1130872, MMC174] and the
Development Plan process.

Name: Maxine Thornley



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

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

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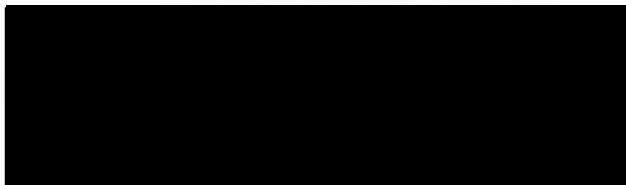
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Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

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

25 OCT 2019

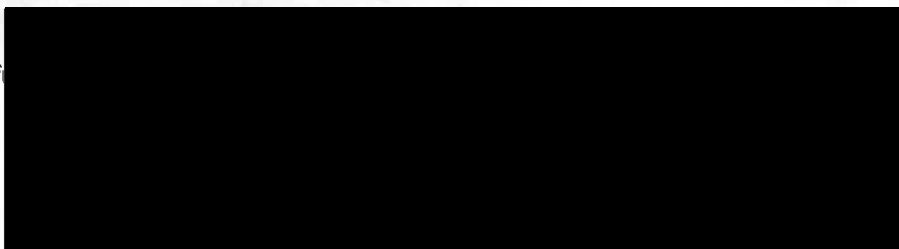
I agree to [Trehwitt, J.953578, MMC217] and the
Planning I [redacted] and
Development Plan process.

Name: JOHN TREWHITT

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

I agree to my data being used by Sunderland Council and the
Plan Trehwitt, M.953579, MMC218 and
Dev

Name... M. TREWHITT

15 October 2019

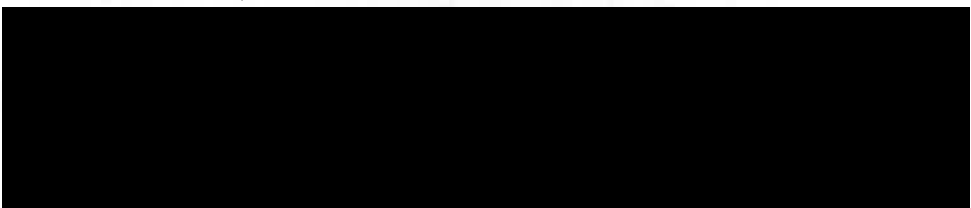
Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

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Yours faithfully,



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

October 2019

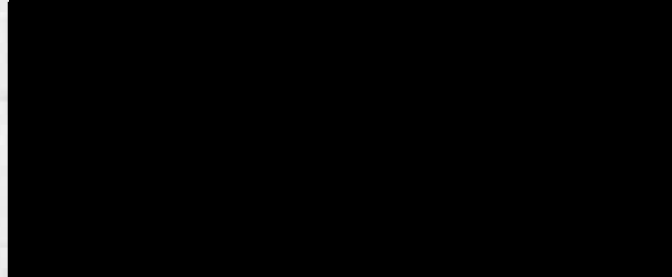
Dear Sirs

25 OCT 2019

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to Trotter, L. 1174688, MMC363 and the
Planning [redacted] Policy and
Development Plan process.

Name M.R.L. TROTTER



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

October 2019

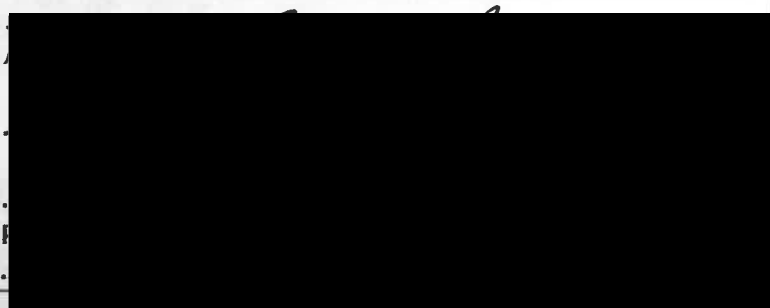
Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

25 OCT 2019

I agree to Turnbull, J.953597, MMC154 and the
Planning Inspector and
Development Plan process.

Name..... *Jim Turnbull*



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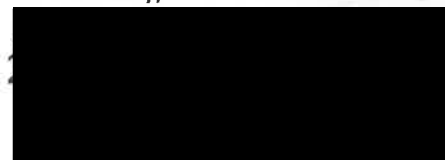
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Yours faithfully,



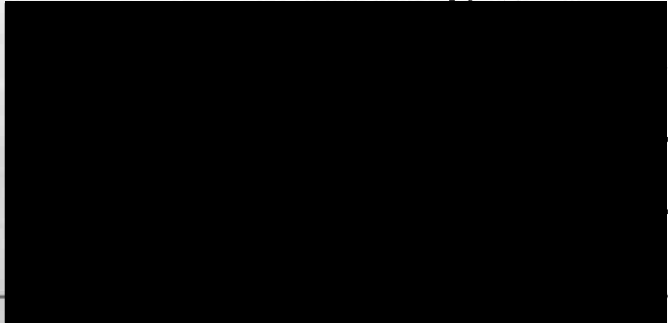
Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
Civic Centre
Sunderland
SR2 7DN

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning and Development process.
Turnbull, M.1133142, MMC155 and

Name: MAUREEN TURNBULL


25 OCT 2019

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

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Yours faithfully,

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

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

25 OCT 2019

Planning and Development Council and the Strategy and

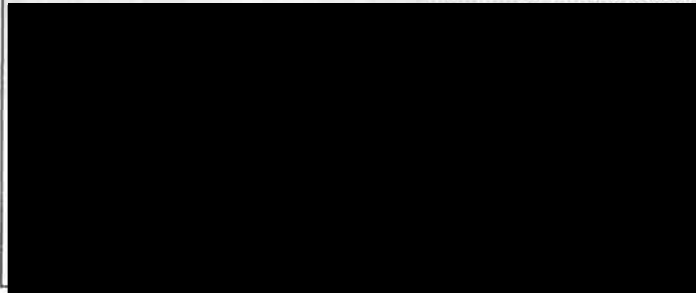
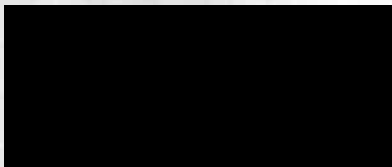
Vorley, C.953263, MMC353

Name CAROLE VORLEY

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Yours faithfully,



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

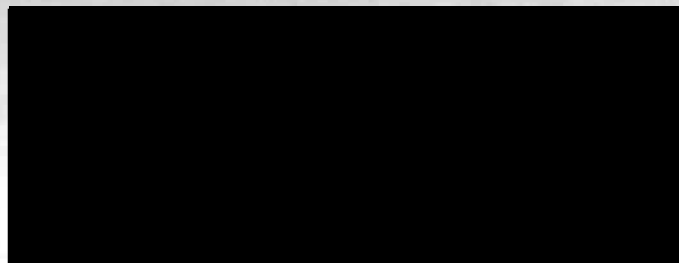
October 2019

Dear Sirs

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 for
Wales, M.1134267, MMC17

Name..... MR MICHAEL WALES



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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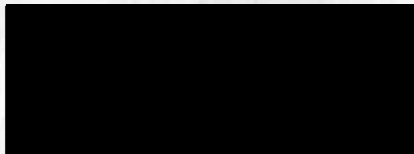
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CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.

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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,



Cllr. Geoffrey A. Walker BA MSc PhD

Kathryn [REDACTED]
Room 2.68
Civic Centre
Burdon Road
Sunderland
SR2 7DN

07/10/2019

Ref: KSCSDP001

Dear Kathryn,

Core Strategy and Development Plan: Proposal to Make Land Adjacent to Herrington Country Park Available for Housing

I write in connection with the above. I have examined the core strategy and development plan and I know the site well. I wish to object strongly to the development of any housing in this location.

Green spaces, particularly natural green spaces, located close to local people provide a range of social, environmental and economic benefits, including:

- increased social activity;
- increased physical activity;
- improvements to children's learning;
- improved community cohesion and sense of belonging.

To support this, the site is currently enjoyed by residents as a sanctuary for farm animals: horses, sheep, highland cattle and llamas occupy the landscape and have done for some years. It is a feature of the area which attracts attention from visitors to the Country Park. This suggests to me that the site would be better suited as a community farm rather than a housing development. Green belt land often includes significant local biodiversity and heritage assets, but it also captures carbon, provides space for water to prevent flooding and protects the water supply.

England is losing an area the size of Glasgow every year because of a record number of developments on greenfield land. Forests, fields and parks are disappearing under concrete at the fastest rate for a quarter of a century, an investigation by The Times has found. On average, 170 sq km of greenfield land were built on every year from 2013 to 2016 after the government relaxed planning rules to ease the housing shortage. The rate of development is more than two-and-a-half times the 25-year average and five times higher than the rate between 2006 and 2011.

The solution we should be, and increasingly are, pursuing is the redevelopment of brownfield sites - 'previously developed' land. Derelict sites within cities and close to their economic and social opportunities should not be ignored in favour of cheaper or more convenient sites for developers.

In our efforts to tackle the housing crisis, suitable brownfield land and not green belt should be the priority. We can also provide more affordable housing in villages for local people, and improve public transport links to encourage economic growth where housing is relatively cheap and plentiful, as Milton Keynes, Peterborough and Swindon already show.

We need new ways of planning and building more homes. We must put elected councils back in the driving seat, with the tools and financial resources to plan for their towns and cities, and to make development happen (through, for example, enhanced compulsory purchase powers or new property tax arrangements). We should also be seeking a richer mix of developers and builders, including housing associations, small builders, long-term developers and community groups, as well as the big housebuilders. Off-site manufacture, with British and foreign firms developing standardised components, can dramatically quicken construction, with houses being built on site in hours or days rather than weeks.

With intelligent design and planning, we don't need to overflow into new towns on greenfield sites; doing so would damage the countryside and - more importantly - wreck our cities. We do need to make more of what we have, unlocking a million development opportunities, and building new places that mix uses, tenures and people, rather than slowly churning out identikit housing estates. Our urban renaissance does need new towns, but they must be new towns in our existing cities.

A recent report by the Campaign to Protect Rural England (CPRE) calculates that only one in 10 homes built on greenbelt land is deemed to be affordable. The study also shows the trend is set to improve only slightly, with analysis of advanced local plans showing that out of 266,000 homes proposed to be built on undeveloped greenbelt land, only a third are likely to be classified as "affordable" according to local policies. The CPRE argues that far from providing much-needed homes for first time buyers, development on the greenbelt is "squandering" the asset.

If houses were to be built there, the question arises is the infrastructure to support the scale of development proposed provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space? All of which are already overstretched resources in the area.

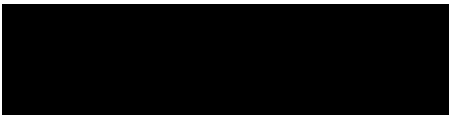
The density of any proposed housing is also a serious area of concern (as it currently is across the City) given the willingness of housing developers to seek maximum return on the unit investment of housing. This, of course, has significant impact on the quality of life of new and old residents alike.

I also note the proximity of this site to the Herrington Country Park. Although there needs to be a gap as intervening land is in a flood risk zone, I believe that this development would have a detrimental impact on the Park and its recreational use. Given the fact that the Park is a key asset to the City and, indeed, a tourist attraction, we should be all concerned regarding the impact on the City's national and international status.

Further, given the pylons crossing the site, I question whether this site can be satisfactorily developed so that living conditions on the site are acceptable. If the pylons are diverted towards the Country Park, they also may have an unacceptable impact there.

Hundreds of researchers worldwide have shown that living near to high voltage power lines and other parts of the electrical transmission network increases your risk of cancer and numerous other health issues. According to research and publications issued by the World Health Organization (WHO), EMF such as those from power lines, can cause headaches, fatigue, anxiety and insomnia. The strongest evidence we have so far relates to childhood leukaemia, where it appears that exposure to Electro Magnetic Field (EMF) higher than 400 n/T increases the risk of acquiring it. Several other studies confirm this. The risk of childhood leukaemia in children not exposed to unusual amounts of low-frequency EMF is fortunately very low - between 3 and 5 cases per 100,000 children - but it increases by approximately 100% in homes where the average low-frequency EMF level is higher than 4 milligauss.

Yours sincerely,



Cllr. Dr. Geoffrey A. Walker

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 provide my details to Sunderland City Council and the
Planning Department for use in the Core Strategy and
Development Plan process.

Ward, C.950876, MMC312

Name..... CHRISTINA WARD

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):

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

Yours faithfully,

[Redacted Signature]

Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
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 Ward, WJ.950872, MMC314 and
Development Plan process.

Name: MR W. J. WARD



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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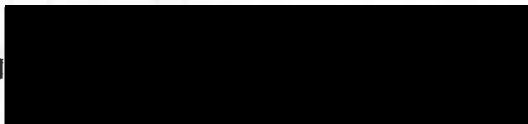
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Yours faithfully



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

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree **Watson, D.1174190, MMC352** and the
Planning and
Development

Name MR DAVID WATSON



25 OCT 2019

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

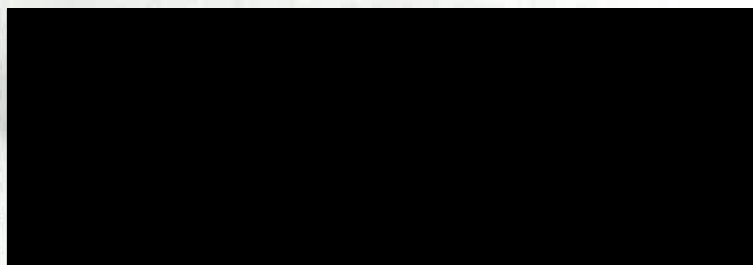
October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning Inspectorate. Watson, H.953758, MMC366 Strategy and
Development

Name MRS. H. WATSON.....



25 OCT 2019

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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 to my data being used by Sunderland Council and the
Planning Inspectorate. Watson, JW.953762, MMC364
Development

Name MR. J. W. WATSON

25 OCT 2019

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

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Yours faithfully,

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

25 OCT 2019

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Plan Watson, M.949745, MMC146 and
Development Plan process.

Name... MRS MAUREEN WATSON

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

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

Yours faithfully,

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

25 OCT 2019

October 2019

Dear Sirs

Watson, V. 1174195, MMC350

and the
gy and

Name: MRS. VERONICA WATSON

CORE STRATEGY AND DEVELOPMENT PLAN

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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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

1134026

25 OCT 2019

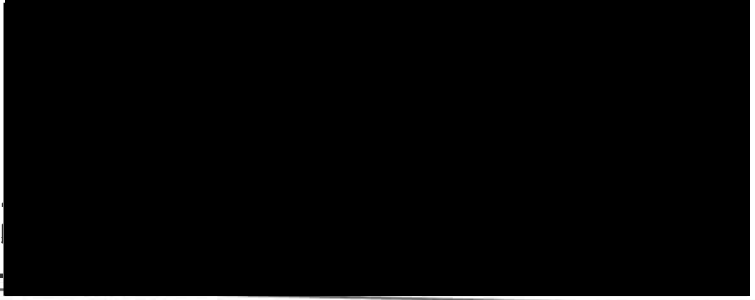
15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to Mr Weatherburn, M.1134026, MMC29 and the Planning Ins... and the Development Plan process.

Name... M Weatherburn



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

953911

15 October 2019

25 OCT 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree Weatherburn, P.953911, MMC30 Council and the
Plan Strategy and
Development Plan process.

Name: P Weatherburn

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Yours faithfully,

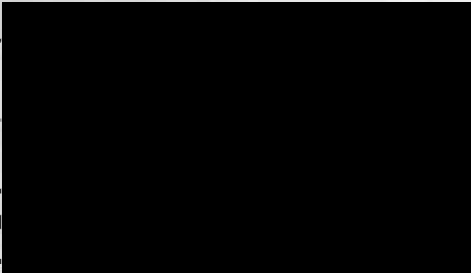
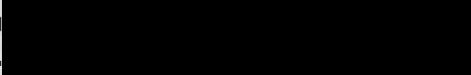
Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
Civic Centre
Sunderland
SR2 7DN

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

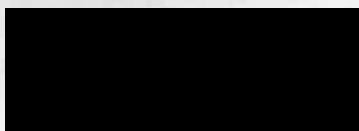
I agree to my data being used by Sunderland Council and the
Plan **Weddle, M.1124872, MMC18** and the
Development Plan process.

Name MR MARK WEDDLE
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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Yours faithfully,



Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
Public 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

Plan Weir, D.953844, MMC268 and
Deve

Name..... *Mr David Weir*



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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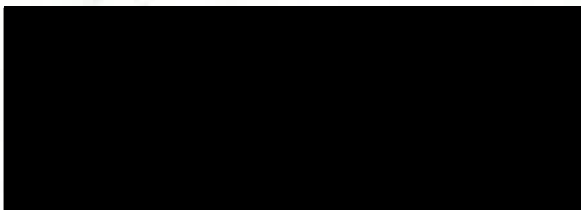
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Yours faithfully,



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

25 OCT 2019

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree Weir, H.953843, MMC269 and the
Plann and
Development Plan process.

Name MRS HELEN WEIR



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

7 4 OCT 2019

15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I: Whitfield, D.953686, MMC294
P: [Redacted]
D: [Redacted]
Name: DAVID WHITFIELD
Address: [Redacted]
Position: [Redacted]

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

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Yours faithfully

[Redacted Signature]

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

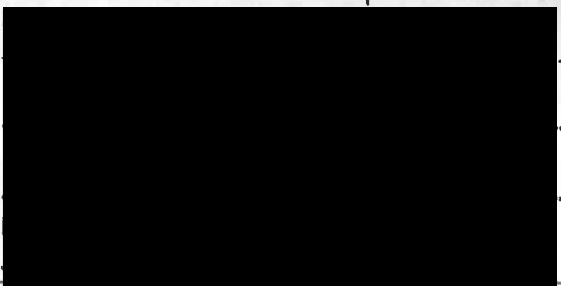
25 OCT 2019

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning and Development Department
Whitfield, F.953687, MMC292
Name... Florence Whitfield



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Yours faithfully,



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

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

25 OCT 2019

I agree to my data being used by Sunderland Council and the
Planning Department
Whittaker, M.953683, MMC159

Name MAUREEN WHITTAKER

Address

Postcode

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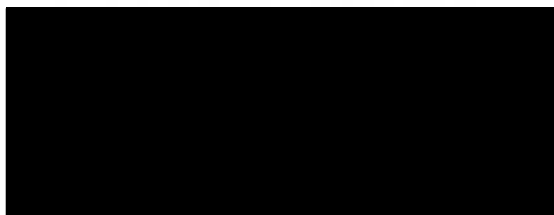
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Yours faithfully,



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
Planning
Development
Wilkinson, J. 1133257, MMC254

Name: J. Wilkinson

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

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

25 OCT 2019

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning Department
Development
Wilkinson, P. 1133200, MMC257

Name: P. Wilkinson

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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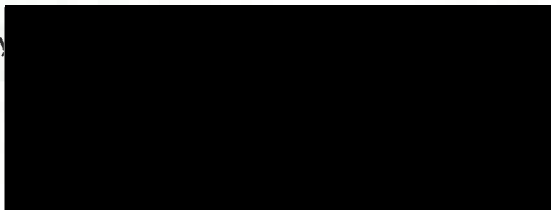
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Yours faithfully



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

25 OCT 2019

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being processed in accordance with the
Planning Inspectorate's Data Protection Policy.
Development Plan process.

Williams, B.1135019, MMC299

Name..... *Brian Williams*

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):

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Yours faithfully,

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

15 October 2019

25 OCT 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

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

Williams, S.1135015, MMC304

Name..... Mrs S.V.A Williams

Address.....

Postcode.....

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Yours faithfully,

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

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

25 OCT 2019

I agree to my data being used by Sunderland Council and the
Planning Inspectorate. Wood, C.950837, MMC237
Development

Name..... CLARE WOOD

Address..... [REDACTED]

Postcode..... [REDACTED]

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Yours faithfully,

[REDACTED]

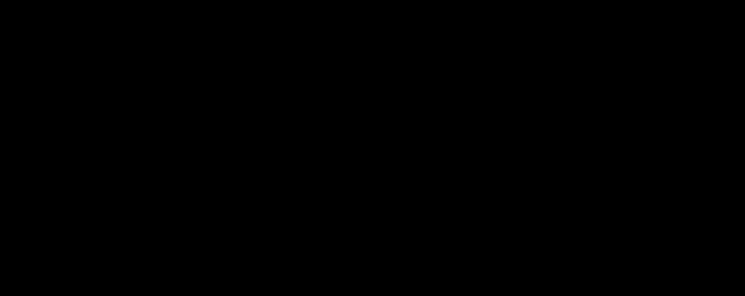
Senior Planning Officer
Planning Strategy
Commercial Development Directorate
Sunderland City Council
City Centre
Sunderland
S2 7DN

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree Wood, D.950854, MMC334 and the
Planning and
Development

Name... D WOOD


25 OCT 2019

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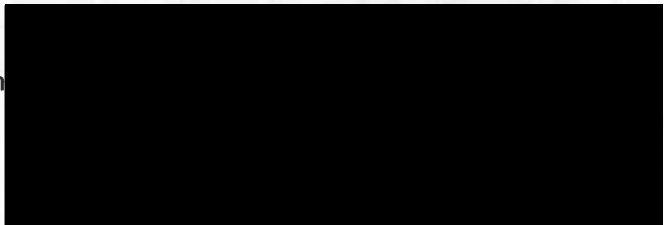
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Yours faithfully



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 for the purposes of the
Planning Inspectorate and the
Development Plan process.

Wood, J. 953946, MMC336

Name..... MR J WOOD

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Yours faithfully,

NEED THE RESERVOIR DON'T WANT THE HOUSES

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

October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning Ins Wood, M.1229879, MMC361
Development Management process.

Name... MRS M. WOOD

25 OCT 2019

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

25 OCT 2019

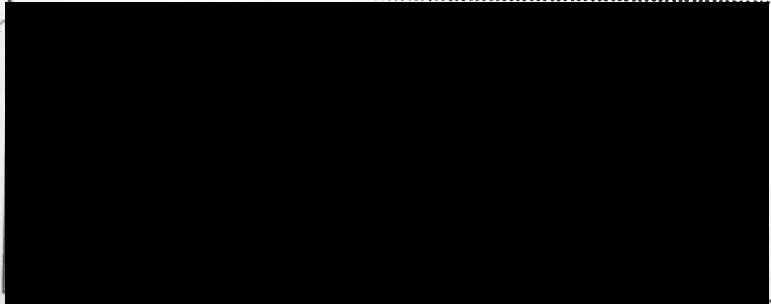
15 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

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Planning and Development process.
Young, HC.1134790, MMC184

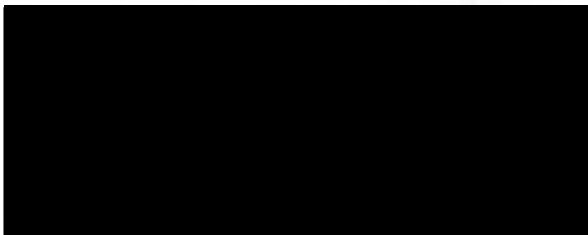
Name: MRS HC YOUNG



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

15 October 2019

Dear Sirs

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Planning
Development Plan process.

Young, J.953616, MMC266

Name

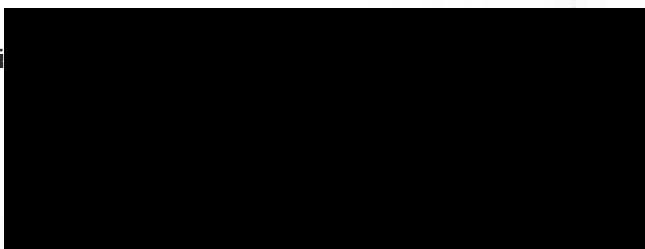
MR JOHN YOUNG

25 OCT 2019

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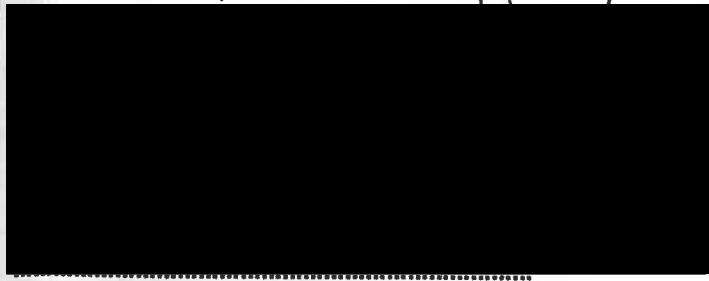


UNDULY MADE REPRESENTATIONS

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

I agree to my data being used by Sunderland City Council and the
Planning Department for the Development Plan process.
McCaffrey, J. 1104833

Name: Jacqui McCaffrey



October 2019

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CORE STRATEGY AND DEVELOPMENT PLAN

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Yours faithfully,



12/10/2019

21/8 OCT 2019

Date: 28 October 2019
Our ref: 294946
Your ref: Sunderland Core Strategy and Development Plan Main Modifications



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

BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Sunderland City Council Core Strategy and Development Plan Main Modifications

Thank you for your consultation on the above dated 13 September 2019 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England have assessed the submitted documents regarding the Main modifications to the Submission draft Core Strategy and Development Plan and have **no comment** to make at this stage.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact me on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

Yours sincerely

Michael Miller
Lead Sustainable Development Advisor

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

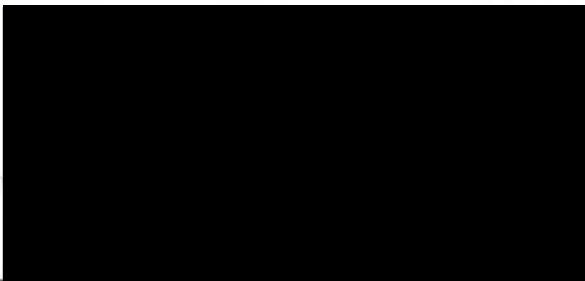
5 October 2019

Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I agree to my data being used by Sunderland Council and the
Planning Inspectorate. Urwin, C.1174149
Development process.

Name..... CHRISTINE URWIN



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Yours faithfully,

C. Urwin

28 OCT 2019