

Matter 7

STATEMENT OF RICHARD COWEN TO THE EXAMINATION IN PUBLIC
INTO THE
SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN
RELATING TO MATTER 7 part 4

1. I make this statement on behalf of the CPRE Durham.
2. We have made detailed representations in response to Matters 2 and 3 relating to “exceptional circumstances” for deleting areas of the Green Belt. We have argued that the proposed Objectively Assessed Need (OAN) for housing is excessive and that there is a good supply of brownfield land available. We believe that those representations are relevant to this Matter and, if accepted, mean that no deletions from the Green Belt are required. We represent that they should be taken into account here.
3. However, we make the following comments to the questions asked in relation to this matter insofar as we have not addressed them in our responses to the above Matters

1. Strategic Policies*1.2 Are Policies SP6 and SS7 justified and effective?*

In so far as these policies relate to deletions from the Green Belt, we believe we have addressed this in our responses to Matters 2 and 3

2. Identification of Sites and Protected Areas*2.1 Do the Green Belt assessments support the HGAs in The Coalfield and demonstrate exceptional circumstances for the removal of land from the Green Belt?*

For reasons we have previously given, we believe the circumstances have not been supported. However, we note the New Herrington proposal for 20 houses appears to amount to infill development on an existing developed site.

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

We believe they have not and do not accept, for reasons given in relation to Matters 2 and 3, that exceptional circumstances have been made out.

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

We believe not

2.4 Are the configurations of the settlement breaks justified?

We believe that they are and we commented on the Settlement Breaks proposal in our letter dated 22 September 2013.

3. HGA9 – Penshaw

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

We 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, we believe that this development would have a detrimental impact on the Park

Further, given the pylons crossing the site, we 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 may have an unacceptable impact there.

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

In view of these comments, we believe not

3.3 Is the site deliverable?

Given the situation with the electricity pylons, we must question whether this site is deliverable. We note the Achievability Conclusion states

“Site is considered to be potentially achievable for development, consisting of a greenfield site in a desirable, mid-value market area. Pylons provide an abnormal cost to be resolved.”

This is not something that, we believe, can be ignored.

4. HGA10 – New Herrington

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

Given the location of this site, and the fact that it appears to be infill, we do not wish to comment further in respect of it. However, we believe the criteria listed in the Site Assessment do need to be catered for.

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

4.3 Is the site deliverable?

5. HGA11 – Philadelphia

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

While we note that a small part of this site is an incursion into the adjoining industrial estate (which we assume is unlikely to be developed for housing), the balance represents a significant intrusion into open countryside and the Green Belt. We note that the south western corner of the site would adjoin existing housing but the rest adjoins industrial premises.

The proposed site appears to be a part of existing fields which would need a new defensible boundary. We are concerned that, if the site is allocated without this, a further encroachment into the Green Belt would be almost inevitable

We also note that the proposed site boundary is different from that mentioned in the site allocation. In effect, the site has been “squared off” to form a rectangle. This may make the impact of housing on this part of the current Green Belt seem harsher than if it were a more irregular shape.

It does not appear to us that this is a logical extension of Philadelphia, even if the site were not Green Belt.

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

No comment

5.3 Is the site deliverable?

We assume the site is deliverable within the meaning of the 2019 NPPF.

6. Infrastructure

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

We are unable to comment

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

No comment

7. Delivery

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

We have considerable concerns about the deliverability of the site at Penshaw but assume there would not be problems with this in respect of the New Herrington and Philadelphia sites.

Richard Cowen

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5 May 2019