

Matter 7 – Session 8

Respondent ID 1168572

Dated May 2019

Representations by The Trustees of the Athenaeum Pension Scheme
to the Core Strategy and Development Plan

Statement of

Mr Andrew Moss BA(Hons), Dip TP, MRTPI

1. **Introduction**

- 1.1. This Statement is submitted on behalf of the Trustees of the Athenaeum Pension Scheme, the 'Trustees'. Their interest is in relation to land to the north of HGA8 Fulwell.
- 1.2. In the Trustees' original submission to the SHLAA Call for Sites in 2013, the area proposed to be allocated in HGA8 and the area to the north in which the Trustees have an interest were included within the area put forward for consideration. For whatever reason only the southern portion, namely the area currently proposed to be allocated in HGA8, is shown on the SHLAA Map 2018. This is returned to later in this submission.
- 1.3. This Statement is to be read in conjunction with the Trustees' representations to the Publication Draft Plan dated 6 July 2018.

2. **Inspector's Questions Matter 7**

Question 1.2

- 2.1. The Trustees support there being a Housing Growth Area at Fulwell amongst other things to support the policy aspiration in SP4 criterion 2 to provide land for the future growth of North Sunderland.
- 2.2. Following on but without prejudice to the above the two Housing Growth Areas as currently proposed would deliver approximately 190 dwellings (110 + 80). The Trustees consider that such a number is too low in strategy terms and that the size of HGA8 should be materially increased along with the number of dwellings to be delivered in this Growth Area in order for the outcome of the policy to be effective.

Question 2.1

- 2.3. In the original submission to the SHLAA in 2013 the area now proposed to be allocated in HGA8 and the area to the north in which the Trustees have an interest were included within the area put forward for consideration. A copy of this Plan is attached as **Appendix 1**.
- 2.4. For whatever reason this site appears not to have been picked up at the time. In this respect;

- 2.4.1. the Strategic Land Review – North **2016** (SP.19) **did not** include an Assessment for the area now subject of HGA8 or the area put forward in 2013, ie the area shown on Appendix 1;
- 2.4.2. The Strategic Housing Land Availability Assessment Appendix L – Sunderland North Assessments **2018** (SD.22a) **does** include an Assessment for the area now subject of HGA8, SHLAA site 675 (Land at Newcastle Road, Fulwell).
- 2.4.3. Neither the Strategic Housing Land Availability Assessment Appendix L – Sunderland North Assessments 2018 nor the SHLAA interactive map (SD.22f) show the site as originally put forward.
- 2.5. Green Belt Review Stage 1 Core Strategy Growth Options Stage 2016 (SD.29). In this Document the HGA8 allocation was included within RE17 and partly within RE15. The Trustees' land and other land they think should be included within HGA8 was within RE16. Each of these areas are shown on Map 2 as *'to be considered further at stage 2'*, ie not discounted at stage 1.
- 2.6. Green Belt Assessment Stage 1 Updated and Stage 2 2017 (SD.30). The outcome for each of areas RE15, RE16 and RE17 was to *'Assess at Site Selection Stage'*, page 58.
- 2.7. Stage 3 Green Belt Site Selection Report 2017 (SD.31) proposed the site now subject of the HGA8 allocation (SHLAA site 675) for release, Map 2, page 21 with the balance including the Trustees' land with RE16 retained as Green Belt.
- 2.8. As noted previously the SHLAA 2016 did not include SHLAA site 675 (Land at Newcastle Road, Fulwell), the site being newly introduced in the SHLAA 2018. It is noted from the Site Assessment (Appendix L SD.22a) that the site was available the comments being, *"Council owned site with potential for disposal – no known constraints to site availability at this point"*.
- 2.9. Whilst the Trustees support the removal of land at Fulwell from the Green Belt, they consider the area proposed as HGA8 is too small and not reflective of the guidance in the NPPF. This is considered in more detail in response to Question 2.3.

Question 2.3

- 2.10. The Housing Growth Areas in North Sunderland are only currently proposed to deliver approximately 190 dwellings (110 + 80). As set out above the Trustees consider this number to be too low in strategy terms.

- 2.11. Following on from the above of the 190 dwellings, 80 dwellings are proposed to be accommodated on the HGA8 Fulwell site. The Trustees consider this number too low and that the allocation should be increased.
- 2.12. Turning to configuration, the Trustees do not consider the configuration reflects the guidance in NPPF paragraph 85. This states that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent. Acknowledging this guidance the Trustees consider;
- 2.12.1. The western boundary should be the substantial tree belt which runs along the western side of the HGA8 / the golf driving range to the north. This is readily recognisable and likely permanent in NPPF para 85 terms;
- 2.12.2. The northern boundary should follow the access road into Fulwell Quarries Car Park. This is readily recognisable and likely permanent in NPPF para 85 terms;
- 2.12.3. The eastern boundary should be Newcastle Road. This is readily recognisable and likely permanent boundary in NPPF para 85 terms;
- 2.12.4. The southern boundary of HGA8 as currently drawn is readily recognisable and likely permanent in NPPF para 85 terms.
- 2.13. Following on from the above the Trustees further consider the HGA8 allocation should extend to the whole area within the boundaries described above and the resulting site developed comprehensively with;
- 2.13.1. A number of dwellings commensurate with the size of the area;
- 2.13.2. Access into the site via the roadabout on Fulwell Road to the north of The Millers Inn.
- 2.14. An image is attached as **Appendix 2** showing the area to which the Trustees consider the HGA8 allocation should apply it amongst other things following readily recognisable and likely permanent boundaries.

Question 4.2

- 2.15. The Trustees consider that in principle the allocation is appropriate notwithstanding the need for a Playing Field Assessment.
- 2.16. A similar issue was discussed at the Stockton Examination in Public in May 2018 in relation to a site at Billingham Campus. An extract from the Inspector's Report on the Examination of the Stockton on Tees Local Plan dated December 2018 is attached as **Appendix 3** and an extract from Policy H1 of the Adopted Stockton

Local Plan January 2019 is attached as **Appendix 4**. The '**' will be noted, additional wording inserted.

- 2.17. Cognisant of the above the Trustees support the additional wording included in Statement of Common Ground as agreed between Sunderland City Council and Sport England.


[illegible]


Appendix 2 - Suggested Extent of HGA8 Fulwell

Land west of Newcastle Road, Sunderland



KEY

 HGA8 Allocation as currently proposed

 Area Trustees consider should be subject of HGA8 Allocation

Appendix 3 – Extract from Inspector's Report on the Examination of the Stockton on Tees Local Plan December 2018

Stockton-on-Tees Local Plan, Inspector's Report December 2018

87. Sites 3.7 (Yarm Road), 3.9 (Darlington Back Lane) and 3.10 (Former Billingham Campus School) all relate to playing fields. A Statement of Common Ground has been submitted between the Council and Sport England which confirms that the Council is committed to delivering artificial grass pitch provision, with the final location to be identified through a Local Football Facilities Plan developed alongside the Football Association.²¹ Such provision is intended to aid the migration from grass pitches to artificial grass pitches. The Statement of Common Ground therefore finds that *"...it is reasonable to conclude that the sites identified will be deliverable within the plan period and the Sport England objection can be removed."*
88. Although the evidence points towards migration to artificial pitches in the near future, this has not yet occurred. I am also mindful that the supporting text to Policy H1 only provides indicative details, not policy requirements. It is therefore necessary to modify Policy H1 to require proposals for development to meet Policy TI2, which broadly reflects paragraph 74 of the Framework in protecting or replacing open space and sports facilities. The Plan also needs to include a clear commitment to take appropriate action should the anticipated migration to artificial grass pitches not occur. Where necessary this should include an early review of the Plan, or parts of it.

Appendix 4 – Extract from Policy H1 of the Adopted Stockton Local Plan January 2019

Conurbation Allocations

5. The following sites within the conurbation are allocated for housing development and are illustrated on the Policies Map.

Site Location/Name		Area (ha)	Dwellings (approx)
1	Darlington Back Lane*	1	25
2	Former Billingham Campus School Site*	10.9	150
3	Bowesfield	6.5	150
4	Kingfisher Way	1.4	37
5	South of Kingfisher Way	0.5	20
6	Magister Road, Thornaby	0.6	20
7	Eaglescliffe Golf Course**	8.9	150

* These sites are currently identified as playing fields and any proposals will be considered in accordance with Policy TI2. Should alternative provision not be secured through TI2 and it becomes apparent that these sites have not become surplus to requirements as playing fields the Council will work with relevant stakeholders to take appropriate action.

** Residential development at Eaglescliffe Golf Course H1(5.7) shall not commence until a remodelled golf course has been delivered on land south of the existing course.