

<p><b>1. Strategic Policies</b></p> <p>1.2 Are Policies SP3 and SS2 justified and effective?</p>	<p>We do not believe these policies are justified because</p> <ol style="list-style-type: none"> <li>1. There is insufficient evidence that the houses are needed- our objections refer</li> <li>2. There is no evidence that houses of the type proposed are needed – our objections refer</li> <li>3. It is naïve to believe that developers would stop at building the numbers of houses proposed. Once greenbelt protection is removed it will be difficult to resist applications to build many more houses to maximise profits without regard to how many, what type and where they are needed.</li> <li>4. The policies are not effective because we believe they will be difficult to enforce</li> </ol>
<p><b>2. Identification of Sites</b></p> <p>2.1 Do the Green Belt assessments support the HGAs and areas of Safeguarded Land in Washington and demonstrate exceptional circumstances for the removal of land from the Green Belt?</p>	<p>We have seen no evidence of exceptional circumstances</p> <p>SD22 Assessment indicates high impact on a variety of metrics for sites HGA1,2 and 3 so how can the council justify releasing them from the greenbelt?</p> <p>The greenbelt assessments do not support HGA 1 (SHLAA refs 407/408: 407a,b,c – pages 137-142 Stage 1 updated and Stage 2 Review) Overall, site 407/408 is given exactly the same weight in the 5 purposes as 407a 407b 407c, and are classed as performing moderately against the 5 purposes [mostly C's and D's] but site 408 is given different weights [mostly B's] and deemed to perform poorly against the 5 purposes .All are put forward for site selection in stage 3</p> <p><b>Stage 3 Greenbelt selection report</b></p> <p>Site 408, even though it performed poorly against the 5 purposes and 407a and 407b [page 63]which performed moderately are discounted in stage 3 because of their closeness to Bowes scheduled ancient monument, quarry noise and dust and the significant impact to the 5 purposes of the greenbelt. Impact to wildlife GI corridor and significant cumulative factors</p> <p>The remaining site 407c was selected for greenbelt deletion simply by denying that the above restraints and factors did not apply to this site [stage 3 page 29] when all of the previous evidence/assessment in stage 1 and 2 states that site 407c has the same circumstances</p> <p>One very important mistake has occurred in stage 2 review on this subject . on</p>

	<p>page 141 of stage 1 update stage 2 review the 5 purposes are assessed as 1[D] 2[C] 3[D] 4 [B] 5[C] yet in table 2 summary of site assessments page 190, purpose 3 becomes 3[C] which is a lesser impact on the greenbelt. This gives the impression that site 407c is different from 407a and 407b</p> <p>We refer you to SHLAA Assessments for 424A and 424B – land south of Stoney Lane where a detailed assessment concluded that each site was “not suitable”. One of these sites has now become HGA 2 and the other safeguarded for future development.</p> <p>The assessment for site 407c contains no detailed information despite there being the same issues as with 407a and 407b – demonstrating a clearly unjustified intention to build houses on it.</p>
2.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?	
2.3 Are the configuration and scale of the HGAs and areas of Safeguarded Land justified taking into account development needs and the Green Belt assessments?	<p>The scale of deletion of greenbelt land around Springwell Village will significantly alter the character and setting of the village in direct contradiction of the Plan’s aim to protect it.</p> <p>The selection of sites has taken no account of existing and unalterable constraints on the local road network (Appendix 1 photographs refer)</p> <p>And no account of the existing community’s use of the primary school which is already oversubscribed with little or no option for expansion.</p> <p>We draw attention to Gateshead Council's " strong concerns regarding the impact of proposed housing allocation HGA1 on both the gap between Springwell Village &amp; Eighton Banks and the Strategic Green Belt gap between Gateshead and Washington/Sunderland</p>
2.4 Is there any justification for the allocation of the safeguarded sites at this stage?	<p>Since the statistics do not support the level of housing proposed, and there is no evidence that brownfield sites have been well used, we consider there is no justification for the safeguarded sites.</p>
<p>Before going on to answer questions on specific sites we would like to draw the Inspector’s attention to the cumulative effect of greenbelt deletions in Springwell Village. This issue has been ignored by the Council.</p> <p>Traffic is a major issue – Appendix 1 refers and clearly demonstrates the lack of opportunity for mitigation measures such as road widening, the existing strain on the road network, the lack of parking facilities for large numbers of residents living in the traditional stone terraced houses that are an integral part of the industrial heritage that gives the village its character.</p> <p>Appendix 3 is a letter from a resident describing traffic difficulties that have been thoroughly explored with the Council who are clear that restrictions and management measures cannot be taken without adversely affecting people living here (as opposed to people travelling through the village)</p>	



Growth Options report 2016: Section 3.32 - Sunderland City Council Ecologists raised concerns regarding the cumulative effect of multiple development sites within corridors and the damage this could cause to green infrastructure and protected species and sites. Ecologists requested that development of greenfield sites be avoided around Springfield Village, north of Washington and north of Nissan due to its ecological sensitivity.

### 3. HGA1 – South West Springwell

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? The Council has clarified that the site promoter owns neighbouring land to facilitate access routes.

The owner of the neighbouring land is Northumbrian Water who plans to build a reservoir – council planners objected, citing the need for the site to remain in the greenbelt. Yet the Council is proposing a greenbelt deletion here. The entire landscape would be irretrievably altered. We cannot see how a huge development like a reservoir which despite being largely underground will have a 2.5m wall on the south side facing Mount Lane, with a housing development on adjacent land which is now a field, could possibly be mitigated.

Such developments would significantly impact on the Bowes Railway line that is a Scheduled Listed Monument

Appendix 2 refers to Northumbrian Water's planning application for an underground service reservoir off Mount Lane ref: 18/02232/SCO  
The excerpt is taken from Sunderland Council's Environmental Impact Assessment Scoping Opinion, (8 March 2019) to NWL's agent Lichfields and clearly demonstrates that development control planning officers are very concerned about many issues on this site whilst strategic planning officers are ignoring the implications related to biodiversity, ecology, environment and heritage.

Access/Transport – we refer you to Appendix 1. The local road network is already strained with a bottleneck at the western end of Mount Lane which cannot be mitigated without demolishing houses.

3.2 Are all the policy requirements within HGA1 necessary and clear to the decision maker?

We met with Hellens, the owner and potential developer of the site. It was very clear their intention is to fully develop the site with hundreds of houses rather than the number quoted in the plan.

3.3 Is the site deliverable?

### 4. HGA2 – East Springwell

4.1 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 development of this site will significantly alter the landscape affecting views from every direction.  
It will significantly alter the character and particularly the setting of the village

the site would be acceptable?	by building on a slope which is highly visible and which currently separates the village from the major road network. The current road does not have the capacity to deal with the extra traffic – Appendix 1 refers
4.2 Are all the policy requirements within HGA2 necessary and clear to the decision maker?	
4.3 Is the site deliverable?	
<b>5. HGA3 – North of High Usworth</b> 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?	All of the comments on access and transport above relate to this site and obviously this site contributes to the cumulative affect that will disastrously affect the character and setting of Springwell Village.
5.2 Are all the policy requirements within HGA3 necessary and clear to the decision maker?	
5.3 Is the site deliverable?	
<b>6. HGA4 – North of Usworth Hall</b> 6.1 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?	
6.2 Are all the policy requirements within HGA4 necessary and clear to the decision maker?	
6.3 Is the site deliverable?	
<b>7. HGA5 – Fatfield</b> 7.1 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?	
7.2 Are all the policy requirements within HGA5 necessary and clear to the decision maker? 6.3 Is the site deliverable?	
<b>8. HGA6 – Rickleton</b> 8.1 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?	
8.2 Is the allocation appropriate in view of the need for a Playing Field Assessment?	
8.3 Are all the policy requirements within HGA6 necessary and clear to the decision maker?	
8.4 Is the site deliverable?	
<b>9. Infrastructure</b>	

9.1 Will the infrastructure to support the scale of development proposed in Washington be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?	
<b>10. Delivery</b>	
10.1 Are the assumptions about the rate of delivery of houses from sites in Washington realistic (anticipated delivery is shown in Appendices A, B, F and O of the SHLAA)?	

Main Evidence Base SD.22 – SHLAA SD.29-34 – Green Belt Assessments SD.59 – IDP SD.66 - Compliance Statement EX1.008 & EX1.010 – Council responses to Inspector's preliminary questions







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1/2 mile



Humps for  
40 yards

















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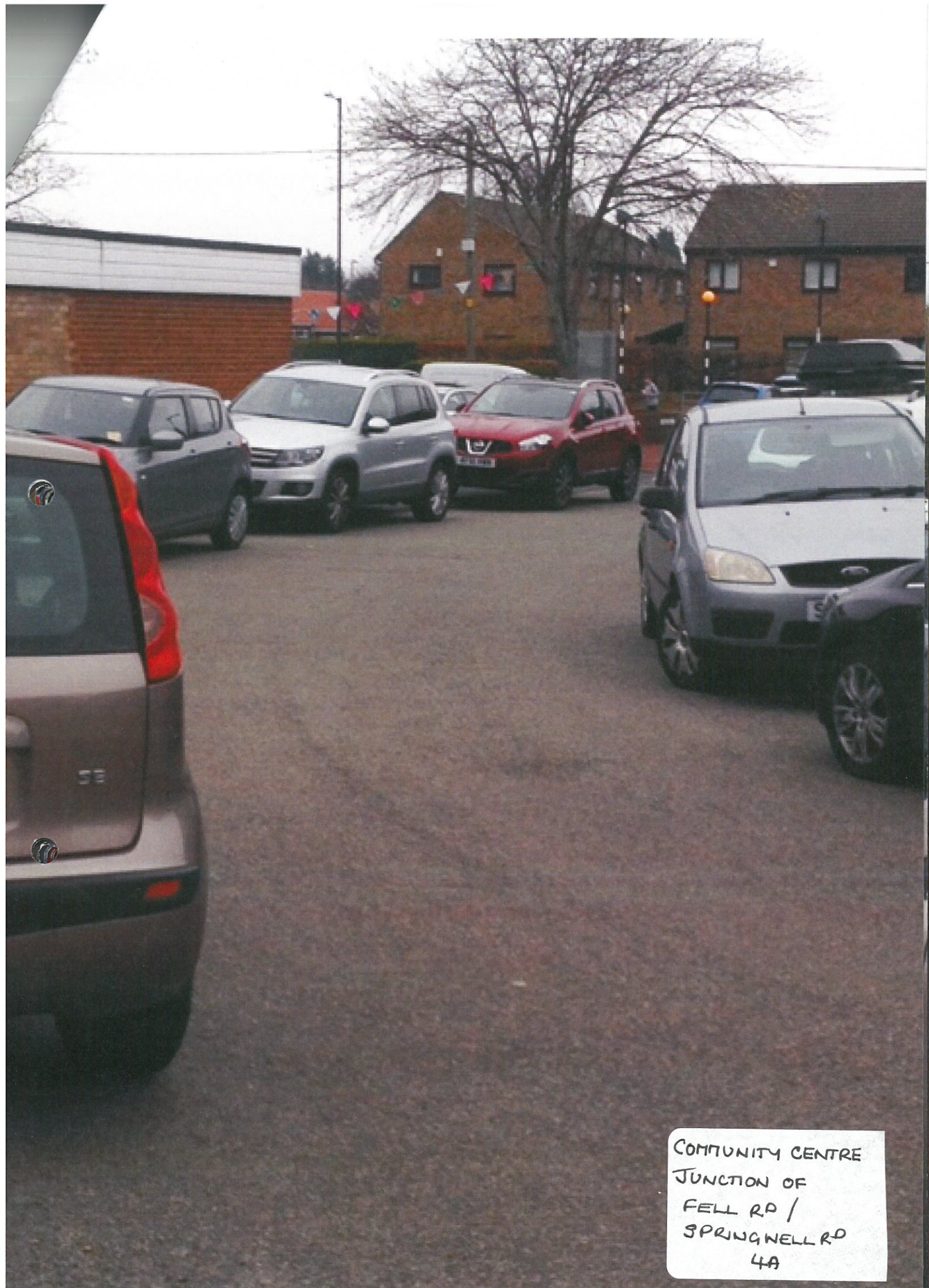






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Below is taken from Sunderland Council's Environmental Impact Assessment Scoping Opinion, (8 March 2019) to NWL's agent Lichfields

## **Biodiversity:**

The Council's Ecologist has previously requested that the following should be included within the scope of the Ecological Impact Assessment (EclA):

- • Bat activity survey
- • Reptiles
- • Invertebrates
- • Wintering birds and breeding birds of conservation concern
- • Northern boundary hedge row

Furthermore, a key concern and area of study from an ecological perspective is considered to be the hydrology of the area and the impact of the development on wetlands such as those in Springwell Ponds Local Wildlife Site (LWS).

## **Heritage and Archaeology**

In their 30 August 2018 consultation response Historic England agreed that the visual effect of the development will be limited, however, on the basis of the submitted information, they disagreed that the development does not have the potential to impact on the evidential or historical value of the Schedule Monument.

Depending on the proposed methodology Historic England considered that there is a potential to impact on The Bowes Railway Scheduled Monument. Historic England therefore requested that consultation should be undertaken with them directly in order to determine the level of harm and potential mitigation.

Attention is also drawn to Historic England's expectation that the ES should contain a thorough assessment of the likely effects the proposed development might have upon those elements which contribute to the significance of the designated heritage assets, as well as a consideration of the potential impacts on non-designated assets.

The Tyne and Wear County Archaeologist has confirmed that the ES will need to include a Chapter on Heritage (as stated in paragraph 5.7 of the Scoping Report), which should include both designated and non-designated heritage assets. The CA has also advised that Paragraph 7.17 should state that "...there are no designated heritage assets other than the Bowes Railway, within or in the vicinity of the site". The CA has also provided commentary on the archaeological work undertaken to date, whilst detailing 5 areas where further archaeological work will be required.

## **Landscape and Visual**

Please also note comments from Historic England 30 August 2018 response detailing their expectations that the ES should contain a thorough assessment of the likely effects on the Scheduled Monument.

In addition, Springwell Village Residents Association believes that the above conditions also apply to adjoining site HGA1 and it should be noted that although the response states "...there are no designated heritage assets other than the Bowes Railway, within or in the vicinity of the site" this does not mean there isn't anything of significant archaeological interest. Indeed, the response states ".... whilst detailing 5 areas where further archaeological work will be required". Ancient waggon ways are known to traverse site HGA1, adjacent Blackhams Hill is believed to be the burial site of a medieval warrior King and in 1068 a battle took place on nearby Shadons Hill between the forces of William the Conqueror and an alliance of Anglo Saxons and Danes.

## Appendix 3

### Traffic Flow in Springwell Village

To get into or out of the Village either heading to Gateshead or Washington you must first access Springwell Road

This applies to

Fairhaven

Windsor Terrace

Uplands Way

Fell Road

Peareth Hall Road

Stoney Lane

Mount Lane

Note Fell Road is the exit for both Shelly Avenue and Beech Grove. estates

None of the roads have any priority of entry and rely on “gentlemanly” behavior of other drivers. My personal experience is of the Fell road junction, where 9 out of 10 cars going in the Gateshead direction only stop when a bus is in front of them. But you still require actions from those travelling to Washington to allow your exit if heading that way yourself.

These junctions can be chaotic now. Without the **proposed additional traffic** that will be coming up Peareth Hall Road, Stoney Lane, and Mount Lane hoping to travel in the Gateshead direction

The affect of this will be to make prisoners of the cars trying to exit from

Fell Road

Uplands Way

Windsor Terrace

Fairhaven

Regards

Peter Lynn