

SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN EXAMINATION
INSPECTOR'S POST HEARING ADVICE – MAIN MODIFICATIONS AND
RELATED MATTERS

Please reply to the Programme Officer

Introduction

1. The purpose of this note is to provide my views on the further Main Modifications (MMs) that are likely to be required to make the Sunderland Core Strategy and Development Plan (LP) sound following the hearing sessions. The MMs are in addition to those potential MMs (1) prepared by the Council following consultation on the publication version of the LP¹, (2) produced in response to my preliminary questions² and (3) put forward during the hearing sessions³. I have highlighted in bold recommended **MMs**.
2. I would also advise that I have given full consideration to all the representations made about the LP including the oral contributions at the hearings. My final conclusions regarding soundness and procedural compliance will be set out in the report to be produced following consultation on the proposed MMs. Nevertheless, having regard to the criteria for soundness and to assist at this stage, I shall provide brief explanations for my advice thus far.
3. My findings may alter in the light of any further evidence that emerges through the consultation process. My views are therefore given here without prejudice to the conclusions that will appear in the report. I do not comment on every issue in this advice. My final report will cover other main issues that arose during the examination but which are not dealt with in this note.

Matter 2 – Spatial Strategy and Related Policies

Issue 1 – The Spatial Distribution of Development

4. There is an imbalance between the supply of, and demand for, employment land in the South Sunderland Sub-Area in particular (SD.37 and SD.38 refers). That said employment land in South Sunderland does contribute to the overall requirement to develop at least 95 hectares of employment land. However, the imbalance within the Sub-Area would be rectified to an extent by reviewing an employment site in South Sunderland which is poorly located in relation to the transport network,

¹ Those Modifications within SD.3 that go to soundness

² EX1.018

³ Action Lists EX17.004, 009 and 012

has no realistic prospect of being used for employment and could make a positive contribution to regeneration and renewal through development for other uses, including housing. I return to this issue under Matter 6.

Issue 3 – Green Belt

5. In principle I can see the case for exceptional circumstances existing to justify the alteration of Green Belt boundaries to accommodate housing needs for the Plan period and safeguarding land to meet longer term development needs. However, in terms of specific sites, some of the Housing Growth Areas (HGAs) would have a significant effect on Green Belt purposes and are also not justified for other reasons. I return to these sites under Matter 7.

Matter 6 – Employment Land Supply

Issue 2 – Key Employment Areas

6. As indicated under Matter 2 the long-term protection of the full extent of the Key Employment Areas in South Sunderland is not justified taking into account the Employment Land Review documents (SD.37 and SD.38), the overall supply of employment land against the minimum requirement of 95 ha⁴ and the prospect of parts of the Key Employment Areas being used for employment purposes. It is recommended that the Key Employment Area designation is removed from that part of KEA1 comprising the former Hendon Paper Mill. I would further recommend that the site should be designated white land with its future use being considered as part of the Allocations and Designations Plan (**MM**).

Matter 7 – Sub-Areas

Washington

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

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

⁴ Taking into account completions since the start of the LP period

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

HGA6 – Rickleton

9. The site contains a number of well-maintained football pitches and is actively used by local football teams. The Council has proposed a MM which would mean that development could only take place if the site is declared surplus to requirements following a Playing Pitch Assessment. However, based on what I have read and heard, it would be unlikely that the site would be surplus to requirements. Therefore, the site is unlikely to be developable. The site also serves Green Belt purposes. For these reasons I recommend that HGA6 is deleted and retained as Green Belt (**MM**).

North Sunderland

HGA7 – North Hylton

10. HGA7 plays a key role as part of the Green Belt in Hylton in maintaining a strategic green infrastructure corridor along the River Wear Estuary and preventing urban sprawl. Although the Green Belt reports suggest that the area subject to HGA7 plays a lesser role I disagree. Indeed, its role is enhanced by its position higher up the valley slopes which make it more prominent from longer distance views across the valley particularly from the south-west. For similar reasons it makes a significant contribution in landscape terms to the river corridor. In this respect I note that it is an area shown for 'Landscape Protection' in the Landscape Character Assessment. For these reasons I recommend that HGA7 is deleted and retained as Green Belt (**MM**).

South Sunderland

Issue 2 – Identification of Protected Areas

11. The general extent of the Green Belt appears to be reasonable. However, West Park seems something of an anomaly as it does not appear to serve any of the Green Belt purposes. Although it has a special character, it has more appropriate designations as a Village Green and greenspace which secure protection under Policy NE4. The Green Belt Assessment Addendum (2018) (SD.32) focuses on the site's role as greenspace rather than its Green Belt role. In my view these factors constitute exceptional circumstances and I recommend removal of West Park from the Green

Belt (**MM**).

The Coalfield

Issue 2 – Identification of Protected Areas

12. The Russell Foster Football Centre does not serve the purpose of a settlement break now that it is surrounded on three sides by development. The Policies Map should be amended to exclude the site from the settlement break so that Policy NE7 is effective (**MM**). The playing fields would be protected by paragraph 74 of the National Planning Policy Framework (2012) and Policy NE4 of the LP.

Conclusions

13. I have recommended the deletion of three HGAs which will have the effect of reducing the supply of specific, developable sites over the LP period. In the first instance I would ask that the Council set out how this potential soundness issue is to be resolved with the objective of ensuring that about 10% flexibility is maintained within the housing supply over the LP period.

Future Timetable

14. Subject to resolution of the issue set out in paragraph 13, the Council should now prepare a composite Schedule of Proposed Main Modifications (MMs). This schedule should include MMs which have arisen since the publication of the LP, including potential MMs discussed at the hearings and those recommended in this post-hearings advice. There will be a number of consequential MMs which also arise from the above recommendations. Supporting documentation such as an updated Sustainability Appraisal and Housing Implementation Strategy would also be required. An indication of the likely timetable for these tasks would be helpful.

Response

15. A response to this note should be provided as soon as possible. It would be particularly appreciated if any comments on the timetable could be provided quickly so that I can ensure that my future work and other commitments do not prevent expeditious progress on the remainder of the examination.

16. This advice should be published on the website as soon as possible. The Council's response should also be published once prepared. However, it should be emphasised that no representations on the contents of this note and the Council's response should be submitted at this stage.

Representations will be invited on MMs once these are published. This note and the Council's response will form background documents to the MMs.

17.If the Council require clarification of any of the above points please contact me via the Programme Officer.

Thank you.

Mark Dakeyne

INSPECTOR

July 2019