

Sunderland City Council and South Tyneside Council

International Advanced Manufacturing Park Area Action Plan

Landscape Technical Background Report

February 2017



South Tyneside Council



ARUP

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Tyneside Council

**International Advanced
Manufacturing Park Area Action
Plan**

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Report

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This report takes into account the particular
instructions and requirements of our client.

It is not intended for and should not be relied
upon by any third party and no responsibility
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Glossary

AAP	Area Action Plan	PRoW	Public Right of Way
BIS	Department of Business, Innovation and Skills	NPS	National Policy Statement
CIRIA	Construction Industry Research and Information Association	NSIP	Nationally Significant Infrastructure Project
DBAP	Durham Biodiversity Action Plan	NWL	Northumbrian Water Ltd
DCO	Development Consent Order	PwC	Price Waterhouse Coopers
DEFRA	Department of Environment, Food and Rural Affairs	SA	Sustainability Appraisal
DPD	Development Plan Document	SEA	Strategic Environmental Assessment
EZ	Enterprise Zone	SEP	Strategic Economic Plan
EU	European Union	SCC	Sunderland City Council
FRA	Flood Risk Assessment	SCI	Statement of Community Involvement
IAMP	International Advanced Manufacturing Park	STC	South Tyneside Council
GBSSO	Green Belt and Site Selection Options Paper	SuDS	Sustainable Drainage System
LDF	Local Development Framework	UDP	Unitary Development Plan
LHA	Local Highways Authority		
LPA	Local Planning Authority		
LVIA	Landscape and Visual Impact Assessment		
LWS	Local Wildlife Site		
MoU	Memorandum of Understanding		
NELEP	North East Local Enterprise Partnership		
NPPF	National Planning Policy Framework		
PPG	Planning Practice Guidance		

1 Purpose

1.1 Overview

1. This is the **Landscape Background Technical Report** for the International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP). The aim of this report is to provide the technical landscape evidence to inform the approach and policies in the IAMP AAP.
2. The term “landscape” is defined in the European Landscape Convention¹ (ELC) as “*an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors*”. This definition has been adopted for this report which looks at the background evidence relevant to the topic of landscape, setting out issues that should be taken into account in developing the approach and policy of the IAMP AAP, and advising on the potential actions that should be further considered in progressing the IAMP proposal to delivery.
3. This report is one of a suite of Technical Background Reports which form part of the evidence base for the IAMP AAP. The full set of reports can be accessed using the following links:
 - www.sunderland.gov.uk/iamp
 - www.southtyneside.gov.uk/localplan

1.2 Introduction to the IAMP

4. The IAMP represents a unique opportunity for the automotive sector in the UK. Located next to Nissan UK’s Sunderland plant, the UK's largest and most productive car manufacturing plant, the IAMP will provide a bespoke, world class environment for the automotive supply chain and related advanced manufacturers to innovate and thrive, contributing significantly to the long-term economic success of the north-east of England and the national automotive sector.
5. The proposal is for 260,000 sq. m. Gross Internal Area (GIA) development aimed primarily at the automotive, advanced manufacturing and related distribution sectors. The IAMP will be located on land to the north of the existing Nissan car manufacturing plant, to the west of the A19 and to the south of the A184. This location benefits from its close proximity to Nissan and excellent transport links with opportunities for integrated connectivity provided by the surrounding Strategic Road Network, rail and port infrastructure.
6. Development of the IAMP will underpin the continued success of the automotive and advanced manufacturing sectors in the United Kingdom and North East of England.

¹ Council of Europe (2000, ratified in the UK in 2006) European Landscape Convention

1.3 Structure of this Report

7. The report is structured as follows:
 - Section 2 Evidence Review - sets out the evidence relevant to this Background Technical Report;
 - Section 3 Key Issues - draws on the evidence to set out the key issues that should be taken into account in developing the approach and policy of the IAMP AAP; and
 - Section 4 Interventions and Actions - advises on the potential actions that should be considered in further progressing the IAMP proposal to delivery.

2 Evidence Review

8. This section presents a summary of the key findings from the evidence review. The information and documents considered in this review are listed in section 2.2 below.

2.1 Overview

9. The land within the IAMP AAP area is relatively flat and comprises primarily medium to large scale, open arable fields, which are enclosed by hedgerows. Tree cover is generally sparse, limited to a few hedgerow trees and small pockets of woodland. The River Don runs west to east through the centre of the area covered by the IAMP AAP. A number of isolated farms and other buildings as well as large scale pylons and power lines are located within the IAMP site.
10. The IAMP AAP site is located within an area currently designated as Green Belt, Strategic Green Infrastructure Corridors of Sunderland and South Tyneside and Great North Forest. Within the centre of the IAMP AAP site along the River Don lies Hylton Grove Bridge (Grade II Listed Building). A number of Public Rights of Ways including the Great North Forest Heritage Trail long distance path cross the IAMP site.
11. The key issues relating to landscape are established through a number of policies, studies and workshops. In summary these are as follows:
- European Landscape Convention¹;
 - National Planning Policy Framework²;
 - Sunderland Unitary Development Plan³;
 - Sunderland Local Plan: Draft Core Strategy and Development Management Policies⁴;
 - South Tyneside Local Development Framework: Core Strategy⁵;
 - South Tyneside Local Development Framework: Development Management Policies Development Plan Document⁶;

² Department for Communities and Local Government (2012) National Planning Policy Framework.

³ Sunderland City Council Unitary Development Plan (including adopted alteration no. 2) (SD16) <http://www.cartogold.co.uk/sunderland/text/00cont.htm> Accessed 22 May 2016.

⁴ Sunderland City Council (August 2013) Sunderland Local Plan: Core Strategy and Development Management Policies. Draft Revised Preferred Options. (SD17) <http://www.sunderland.gov.uk/CHttpHandler.ashx?id=17920&p=0&fsize=6Mb&ftype=Draft Core Strategy Sept 2013.PDF> Accessed 19 May 2016.

⁵ South Tyneside Council (2007) South Tyneside Local Development Framework Core Strategy. (SD22) <http://www.southtyneside.gov.uk/CHttpHandler.ashx?id=2468&p=0> Accessed 19 May 2016

⁶ South Tyneside Council (2011) South Tyneside Local Development Framework Development Management Policies. (SD21) <http://www.southtyneside.gov.uk/CHttpHandler.ashx?id=13672&p=0>. Accessed 28 June 2016

- South Tyneside SPD3: Green Infrastructure Strategy⁷;
- City of Sunderland Landscape Character Assessment⁸;
- South Tyneside Landscape Character Study⁹;
- Great North Forest Plan¹⁰;
- Sunderland Partnership Green Infrastructure Strategy Framework¹¹; and
- Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3)¹².

2.2 The European Landscape Convention

12. The European Landscape Convention¹ (ELC) is an international treaty and is aimed at the protection, management and planning of all landscapes, including outstanding as well as everyday and degraded landscapes. It covers natural, rural, urban and peri-urban areas. The treaty promotes the use of landscape character and visual impact assessments to enhance the natural environment.
13. Natural England is working with and advising the Government, stakeholders and the public in England and across the UK to develop an implementation strategy to help promote and develop the principles of the ELC further.

2.3 National Planning Policy

14. The National Planning Policy Framework² (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The paragraphs which are considered most relevant to landscape issues associated with the IAMP AAP site have been outlined below.
15. Paragraph 14 of the NPPF sets out a clear presumption in favour of sustainable development. Paragraph 7 identifies three dimensions to sustainable development – economic, social and environmental. It is the environmental dimension which identifies that the planning system should contribute to protecting and enhancing our natural, built and historic environment that is considered most relevant to this Landscape Technical Background Paper.
16. Paragraph 17 of the NPPF sets out twelve core planning principles that should underpin all plan-making and decision-taking. These include seeking to secure high quality design and a good standard of amenity for all existing and future occupants; taking account of the different roles and character of different areas,

⁷ South Tyneside Council (February 2013) South Tyneside Local Development Framework Supplementary Planning Document 3: Green Infrastructure (SD48)

⁸ Land Use Consultants (September 2015) City of Sunderland Landscape Character Assessment (SD45)

⁹ Land Use Consultants (March 2012) South Tyneside Landscape Character Study (SD46)

¹⁰ Great North Forest Partnership (2003) Great North Forest Plan

¹¹ Green Infrastructure Steering Group on behalf of the Sunderland Partnership (March 2011) Green Infrastructure Strategy Framework

¹² Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)

including recognising the intrinsic character and beauty of the countryside; conserving and enhancing the natural environment, including allocating land of lesser environmental value; promoting mixed use development; conserving heritage assets; and focusing development in sustainable locations.

17. Paragraph 56 identifies that “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”
18. Paragraph 58 outlines that developments should respond to local character and add to the overall quality of the area. This is further supported by Paragraph 61, which requires planning policies and decisions to address “*the integration of new development into the natural, built and historic environment.*”
19. Paragraph 74 seeks to protect existing open space, sports and recreational buildings and land, including playing fields, from development unless they are shown to be surplus to requirement, they will be replaced with equivalent or better provision in terms of quality and quantity or the development is for alternative sports or recreational provision.

2.4 Local Planning Policy

2.4.1 Sunderland City Council

2.4.1.1 Sunderland Unitary Development Plan

20. The adopted Sunderland Unitary Development Plan³ (UDP) (SD16) sets out saved policies which with regards to landscape inter alia:
 - Secure improvements within and adjacent to degraded land on the urban fringe and prominent edges of built up areas (Policy B1);
 - Enhance the best qualities of the locality and relate harmoniously to adjoining areas by respecting scale, massing, layout and setting (Policy B1);
 - Avoid adverse effects on character or setting of listed buildings (Policy B10);
 - Protect and enhance landscape features, buildings of character, significant wildlife habitats, strategic and local wildlife corridors, trees and hedgerows (Policy CN1);
 - Restrict development which would have harmful impact on the landscape due to its siting, materials or design (Policy CN1);
 - Ensure that the visual amenities of the Green Belt will not be harmed by development proposals within or conspicuous from the Green Belt, without being prejudicial to the purposes of the Green Belt¹³ (Policy CN5);

¹³ It should be noted that Green Belt is not a landscape designation. Green Belt policy within the National Planning Policy Framework does not consider visual amenity or landscape character and quality to be relevant to the purposes of Green Belt. Green Belt and the potential impact on Green

- Enhance and protect the landscape on the urban fringe by improving the landscape (including tree planting) (Policy CN7);
- Protect and enhance important public views of townscape, landscape and other features (such as Penshaw Monument – officially The Earl of Durham's Monument, Grade I listed) from perceived transport corridors and outdoor venues. New developments shall not interrupt or prejudice views (Policy CN13);
- Support the creation of the Great North Forest (Policy CN15);
- Protect valued and important aspects of natural and built environment, avoiding risk of serious environmental damage (Policy R1);
- Encourage intensive planting of tree belts and woodlands using locally native species within and adjacent to the existing Nissan complex, where possible (Policy WA21); and
- Support a long term standard of 1.6-1.8 hectares per 1,000 population for open sport and recreation (Policy L4).

2.4.1.2 Sunderland Local Plan: Draft Core Strategy and Development Management Policies

21. The Sunderland Local Plan: Draft Core Strategy and Development Management Policies⁴ (SD17) with regard to landscape seeks to:

- Protect and conserve the city's natural environment (Policy CS7.1);
- Create an environment, which makes a positive contribution to local character and establishes a distinctive sense of place (Policy CS7.2);
- Protect, conserve and enhance varied landscape character and the separate identity of settlements (Policy CS7.6);
- Protect, conserve and enhance listed buildings and their setting (Policy CS7.9);
- Create places with character and identity based on local context, constraints and distinctiveness, ensuring the layout, scale and massing is compatible with the surroundings (Policy DM7.1);
- Create developments which are sensitive to the character of the countryside and local distinctiveness (Policy DM7.18);
- Create schemes which retain or enhance existing landscape features or offer appropriate mitigation measures for loss of landscape features to reflect local landscape character (Policy DM7.19);
- Retain all trees, woodlands and hedgerows of amenity and wildlife value, which contribute individually or as part of a group within the broader landscape setting (Policy DM7.20); and

⁴ Belt is considered in detail in the Exceptional Circumstances for Release of Land from the Green Belt Technical Background Paper.

- Protect land used for sport or recreation unless it can be demonstrated that the development brings substantial benefits to the community that would outweigh the harm resulting from the loss of open space and alternative provisions are provided (Policy DM7.23).
22. The emerging Sunderland Local Plan has not yet been adopted, it therefore carries less weight than the adopted Sunderland UDP.

2.4.2 South Tyneside Council

23. The adopted South Tyneside Local Development Framework (LDF) provides the current policy environment for South Tyneside relevant to landscape issues associated with the IAMP AAP site. The South Tyneside LDF comprises several documents, those considered most relevant to the topic of landscape are the Core Strategy⁵ (SD22), Development Management Policies Development Plan Document⁶ (DPD) (SD21) and Supplementary Planning Document 3 (SPD3): Green Infrastructure⁷ (SD48).

2.4.2.1 Core Strategy

24. Strategic Objective 16 within the Core Strategy (SD22) seeks to “protect and enhance the quality of the Borough’s land and landscapes”.
25. Core Strategy Policy EA1: Local Character and Distinctiveness aims to ‘protect and enhance the openness of the Green Belt’, to ‘preserve the special and separate characters of the urban fringe villages’ and to ‘implement the Great North Forest strategies for access, education, enterprise and biodiversity’ by inter alia enhancing the River Don Valley farmland into a well-wooded recreational landscape and enhancing the North Sunderland fringe by significantly increasing the tree cover.

Development Management Policies DPD (SD21)

26. Development Management Policy DM1: Management of Development contains a number of relevant sections, the first five of which seek to protect or enhance the landscape and the features within it. Section A seeks to ensure that new development considers its surroundings and where possible local setting, reinforces local identity, has regard to the scale and proportions, alignment, form, use of materials and architectural detailing of the development. Section B seeks to protect residential amenity while Section C seeks to protect existing vegetation, providing replacement planting where necessary. Section D supports the provision of high quality well-designed external spaces which are linked, where possible, into the wider green infrastructure network, improving visual amenity. Section E seeks to incorporate landmarks and focal points within external spaces to aid the legibility of the development.
27. Development Management Policy DM6: Heritage Assets and Archaeology seeks to protect, preserve and where possible enhance the visual appearance of setting of heritage assets and their settings, including listed buildings and buildings contained on the South Tyneside’s list of locally significant heritage assets.

SPD3: Green Infrastructure

28. The content of SPD3: Green Infrastructure⁷ considered relevant to the topic of landscape has been considered under Section 2.7.2 below.

2.5 Landscape Character Assessment

2.5.1 City of Sunderland Landscape Character Assessment

29. The City of Sunderland Landscape Character Assessment⁸ (SD45) (the Assessment) describes and assesses the landscape within the administrative area of the City of Sunderland. The Assessment forms part of the evidence base for development plan documents.
30. The southern part of the IAMP AAP site, which adjoins the existing Nissan plant, is classed in the Assessment as forming part of the Coalfield Lowland Terraces Landscape Character Type (LCT) and the Usworth Lowland Landscape Character Area (LCA).
31. The Assessment highlights that the character of the wider Coalfield Lowland Terraces LCT area is negatively impacted by the existing infrastructure, including the major roads as well as the industrial and business park. Sensitive features are recreational value of paths and cycle ways, the settlement fringe character and the distinction between settlements.
32. The Assessment summarises the following guidelines for the Coalfield Lowland Terraces LCT area:
- Integrate any new roads through careful alignment;
 - Preserve access routes for pedestrians and cyclists;
 - Maintain green network connections, compensating any loss of woodland, trees or open space with new accessible spaces;
 - Enhance and extend landscaping;
 - Integrate new buildings into the landscape;
 - Utilise locally native species;
 - Enhance maintenance of landscapes in and around industrial/commercial premises, including woodland and hedges;
 - Avoid adversely encroaching on Green Belt or block green corridors;
 - Enhance accessibility including upgrading and maintaining links between communities and recreational areas;
 - Enhance routes through the area such as the footpath and bridleway at Barmston Lane to the south of Nissan;
 - Promote pedestrian and cycle access to work;
 - Provide links to wider networks such as River Wear Trail and neighbouring areas;

- Avoid modification of streams or negative impact on water quality or flood incidences;
 - Enhance/strengthen settlement boundaries such as woodland belts;
 - Avoid piecemeal development, which would erode the distinction between urban and rural landscape; and
 - In accordance with Green Belt policy and supporting studies ensure careful consideration of development proposals, which could erode the separation of settlements.
33. The Assessment identifies the following key issues in the Usworth Lowland LCA area which contribute to its landscape value:
- Large undeveloped area, which acts as a break between the settlements of Washington and Sunderland;
 - Continuation of large area of similar farmland to the north;
 - North East Land, Air and Sea Museum (NELSAM) visitor attraction, highlighting the history of the landscape as an airfield; and
 - Barmston Pond Local Nature Reserve providing ecological interest.
34. The Assessments describes the following landscape strategy for the Usworth Lowland LCA:
- Enhance landscape towards a high-biodiversity area, incorporating potential for recreation associated with existing and future commercial development;
 - Maintain existing hedges and trees in the north and enhance as part of new proposals;
 - Retain openness between Sunderland and South Tyneside in line with Green Belt purpose where applicable;
 - Retain views to Boldon Downhill as they provide a sense of place;
 - Improve connections through better green networks around existing land uses, linking current isolated features such as the Barmston Pond nature reserve; and
 - Providing pedestrian and cycle links between adjacent residential areas and the River Wear as they would improve recreational opportunity and routes to work.

2.5.2 South Tyneside Landscape Character Study

35. The South Tyneside Landscape Character Study⁹ (SD46) (the Study) describes and assesses the landscape within the administrative area of South Tyneside. The assessment forms part of the evidence base for the Council's development plan documents, including the IAMP AAP.
36. The northern part of the IAMP AAP site forms part of the Boldon Fell Local Landscape Character Area. This is described as a flat, urban fringe landscape with primarily large scale, open arable fields and 'gappy' hedges. Smaller field parcels

can be found toward the A19. The area comprises farms and country houses. The tree cover is sparse and locally concentrated around farms and along roads.

37. The River Don follows the borough boundary with small drains discharging from the area into the river. There are overhead power lines and a major arterial roads such as the A19 and the A184, which impose a strong human influence onto the area. This open flat landscape allows generally unimpeded long views towards landmarks such as Penshaw Monument. There is restricted access into this area, limited to a few footpaths.
38. The Study identifies the following guidelines for the IAMP AAP area:
 - Reinstatement of hedges for landscape and habitat value;
 - Planting of new woodland areas to reinforce landscape structure;
 - Prevent removal of remaining mature woodland;
 - Avoid further increase of overhead power lines ('wirescape') across the area;
 - Enhance access networks across the area, using existing paths and promoting new links;
 - Create linear habitat links between sites of habitat value, using new hedge and woodland planting, in particular along watercourses;
 - Retain open landscape and views, in particular from the north; and
 - Avoid woodland planting which would obstruct key views.
39. Boldon Fell lies within the Great North Forest Local Management Zone LM1 – Don Valley Farmland. The Study highlights that Boldon Fell, which the IAMP AAP site is part of, plays an important role in maintaining the separate identity of South Tyneside towards Gateshead and Sunderland. Boldon Fell can be seen from residential areas to the north, from Boldon Downhill and long views from Penshaw Monument as well as transport corridors including the A184, the A194 and the A19.
40. The Study concludes that an increase in woodland within Boldon Fell will enhance the value of the Green Belt as it enhances the perceptual separation between settlements. Key southwards views from Fellgate for instance towards Penshaw Monument need to be taken into account. Along transport corridors further woodland would lessen noise and improve the Boldon Fell area for recreation.

2.6 Great North Forest Plan

41. The IAMP AAP site and much of the surrounding open countryside, which is enclosed by the nearby settlements of Sunderland, Gateshead, South Tyneside and Washington, lie within the designated Great North Forest¹⁴.

¹⁴ The Great North Forest was the first community forest in England. The management organisation for the Great North Forest was disbanded in 2008.

42. The Great North Forest Plan¹⁰ (the Plan), which set out the management strategies for the area, identifies the IAMP AAP site and the surrounding landscape as part of the Central Lowland character area and more precisely as part of the Local Management Zone LM1 – Don Valley farm land.
43. Don Valley Farmland (LM1) is described as extensive, flat, low-lying arable, open countryside with large fields and low cut boundary hedges, surrounded by very visible urban edges.
44. The Plan seeks to enhance this area towards a well-wooded recreational landscape, which contains ‘surrounding intrusions and new development within an extensive framework of large and small scale mixed woodlands enclosing a network of open corridors around the feeder streams of the upper River Don’.
45. The Plan also aims to ‘retain views’ and ‘use woodland as the ‘frame’ for achieving this’.

2.7 Green Infrastructure Strategy

2.7.1 Sunderland Partnership Green Infrastructure Strategy Framework

46. Sunderland City Council and the Sunderland Partnership are preparing a Green Infrastructure Strategy for Sunderland. As a first step Sunderland Partnership has overseen preparation of the Green Infrastructure Strategy Framework¹¹ (SD49) (the Framework) which was endorsed by the City Council's Cabinet in March 2011 as the basis for preparing the strategy.
47. The Framework sets out the main elements that, together, will form an effective strategy for the improvement, protection and understanding of green infrastructure in Sunderland. The Framework identifies a provisional vision for green infrastructure in Sunderland as follows:
48. “The economic and social development of the city will be enhanced through its setting in surroundings of high quality green infrastructure that will be provided through a network of green spaces and links, including coastal, river and other water features, designed and managed to maximise their multi-functional potential.”
49. It is outlined that green infrastructure will encompass urban and rural existing and new green spaces, threading through and surrounding the built environment, connecting urban areas to the surrounding countryside.
50. The Framework sets out a series of provisional principles for green infrastructure in Sunderland to be used as a basis for creating green infrastructure schemes and improvements in the absence of a green infrastructure strategy.
51. The Framework then sets out an action plan for the delivery of the Sunderland Green Infrastructure Strategy.

2.7.2 South Tyneside Green Infrastructure Strategy

52. South Tyneside LDF Supplementary Planning Document 3⁷ (SD48) (SPD3) identifies that green infrastructure is considered essential to help deliver the spatial vision provided by the South Tyneside Core Strategy. SPD3 provides an analysis of the existing green infrastructure within the borough and sets out South Tyneside Council's vision for its future improvements and provision. The SPD's open space and playing fields analysis and needs assessments have since been updated by the recent South Tyneside Open Space and Playing Pitch Strategy studies (2015/16).
53. The part of the IAMP AAP site in South Tyneside is located within an area identified as 'Green Belt Corridor: Urban Fringe agricultural area'. The priorities identified for this area are:
 - Preserve the separate characters of the Urban Fringe villages;
 - Maintain and, where possible, improve green infrastructure links/corridors with Sunderland and Gateshead Councils; and
 - Prevent the merging of South Tyneside's urban areas with Sunderland, Washington and Gateshead.
54. SPD3 identifies that green infrastructure provides opportunities to enhance local identity, visual amenity and landscape character, helping to create a positive sense of place. It also identifies that it is considered important that development protects and enhances existing green infrastructure and that green infrastructure should be used to create an attractive identity for new development.
55. Trees and hedgerows are identified as important elements of the green infrastructure network, playing an important role in most types of open space and along roads and areas such as areas of hard standing where the provision of other types of green infrastructure is not possible. It is outlined that schemes should be put in place to improve the quantity and quality of street trees and hedgerows.

2.8 Playing Field Policy

2.8.1 Sport England

56. Sport England is the statutory consultee on all planning applications for development affecting playing field land. It is their policy to oppose any application which will result in the loss of playing field land unless it is satisfied that the application meets with one or more of specific exceptions outlined in their Planning Policy Statement – A Sporting Future for the Playing Fields of England¹⁵. In summary the exceptions are as follows:
 - Exception 1 – Excess of provision;
 - Exception 2 – Ancillary development;

¹⁵ Sport England (unknown) Planning Policy Statement – A Sporting Future for the Playing Fields of England

- Exception 3 – Land incapable of forming part of a pitch;
- Exception 4 – Replacement provision; and
- Exception 5 – Sports facilities.

2.8.2 Sunderland City Council

57. The Sunderland City Council Playing Pitch Plan¹⁶ (SD47) (PPP) provides a strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities within Sunderland. The PPP outlines the following vision:
58. *“Sunderland has an accessible range of playing pitch facilities and venues which offer increased opportunities for all sections of the community to participate in both formal and informal opportunity, contributing to a higher quality of life.”*
59. The PPP is split into three distinct sections:
 - The Strategy which sets out the aims and objectives and provides the framework for improvements;
 - The Action Plan which provides recommendations on a site-by-site basis, based on current levels of usage, quality and demand, as well as identifying the potential of each site for enhancement; and
 - Playing Pitch Plan Priorities which have been developed with the aim of ensuring maximum benefit and access to pitches for city residents.
60. Plessey Sports Field, which is located to north of the NELSAM on Washington Road, is identified within the PPP. The playing field is identified as being overplayed (i.e. when there is more play accommodated than the site is able to sustain, however this is often dependent upon pitch quality). The recommended action for the playing field is to *“improve the quality of the pitches to increase carrying capacity”*. This is identified as a short term priority.

2.9 Environmental Workshops

61. A series of environmental workshops have been held with the following key stakeholders:
 - Natural England;
 - Environmental Agency;
 - Royal Society for the Protection of Birds (RSPB);
 - Durham Wildlife Trust;
 - North East Local Nature Partnership (NELNP); and
 - South Tyneside, Sunderland and Gateshead Councils’ ecologists.

¹⁶ [Knight Kavanagh & Page \(January 2015\) Sunderland City Council Playing Pitch Plan](#)

62. Through the workshops, a series of high level ecology and landscape strategy principles have been developed that highlight the key issues the stakeholders would like to see considered. The outcomes of these workshops have informed the key strengths, opportunities, mitigation measures and enhancements outlined, and, at a high level, will help to inform the development of policies within the AAP.

2.10 Summary of Landscape Character and Features of the Land within the AAP Area and the Wider Area

2.10.1 Site

63. The IAMP AAP site, i.e. the area within the AAP red line boundary, comprises primarily medium to large scale, open arable fields, which are enclosed by hedgerows. Hedges are of various condition and range from continuous to fragmented, generally non-clipped lines of vegetation. Tree cover is generally sparse and limited to a few hedgerow trees and small areas of woodland. Woodlands are mainly located along the River Don as well as within a shelterbelt at Elliscope Farm.
64. An area of playing fields (known as Plessey Sports Field) are located to the north of the NELSAM on Washington Road.
65. The topography of the IAMP AAP site is relatively flat and low lying. The River Don gently winds west to east across the centre of the IAMP site. The IAMP AAP site encompasses many streams and ditches, which drain into the River Don. There are also a few field ponds and marshy areas within the IAMP AAP site.
66. The IAMP AAP site includes a number of isolated farmsteads, a pub and the NELSAM. There are large scale pylons and power lines criss-crossing the IAMP APP site.
67. The Great North Forest Heritage Trail long distance path runs west to east across the IAMP AAP site along Follingsby Lane and Downhill Lane. There are also Public Rights of Way (PRoW) within the northern part of the IAMP AAP site.
68. The IAMP AAP site is located within an area designated as Green Belt, Strategic Green Infrastructure Corridors of Sunderland and South Tyneside and Great North Forest. Within the centre of the IAMP AAP site along the River Don lies Hylton Grove Bridge (Grade II Listed Building).

2.10.2 Wider Area

69. The IAMP AAP site lies within the open countryside immediately adjoining a large industrial area (Nissan manufacturing plant) to the south.
70. To the east of the IAMP AAP site is the A19 dual carriage way, which is a major north to south transport route. Beyond the A19 lie the residential areas of Sunderland to the south and agricultural fields to the north. Wide landscape buffers, comprising a mixture of deciduous woodland rough grassland and amenity grassland, line both sides of the A19, separating the residential

development to the east of the A19 from the Nissan manufacturing plant on the west. Along the western side of the A19 the landscape buffers vary in size from over 100m wide around the south of the Nissan manufacturing site, reducing to a pinch point approximately 20m wide in the north of the Nissan manufacturing site. Along the eastern side of the A19 the landscape buffer between the A19 and the residential development at Town End Farm and Hylton Castle varies between approximately 50-75m wide.

71. To the north and west the IAMP AAP site adjoins a small area of open countryside. This area provides separation between the settlements of Sunderland, South Tyneside, Washington and Gateshead. Business and residential areas of South Tyneside are situated approximately 0.7km and 1.4km from the northern IAMP site boundary, whilst residential areas are located approximately 850m to the west of the IAMP AAP site.
72. There are long distance views from the countryside towards landmarks such as Boldon Downhill and Penshaw Monument (Grade I Listed Building). Important panoramic views designated by Sunderland City Council and which overlook the IAMP AAP site include views from Penshaw Monument, from the A19 and from an elevated off-road cycle route to the south of Wearside Golf Course.
73. The wider area around the IAMP AAP site is located within the Green Belt, the Great North Forest and within the Strategic Green Infrastructure Corridors of Sunderland and South Tyneside.
74. Listed buildings within the surrounding area include Penshaw Monument (Grade I Listed Building), Boldon Fellgate Farmhouse (Grade II Listed Building) as well as buildings associated with Scot's House (Grade II* Listed Building) to the north, Laverick Hall (Grade II Listed Building) to the north west, Downhill House (Grade II Listed Building) to the north east and Usworth Hall Washington Development Corporation Headquarters (Grade II Listed Building) to the west.

3 Key Issues

3.1 Overview

75. In response to the evidence base outlined above and the summary of the existing situation, this section provides an overview of the key landscape issues and constraints that the IAMP AAP is seeking to address. Key opportunities are also highlighted.

3.2 Key Issues and Constraints

76. A summary of the broad key issues, constraints and barriers to delivery, as identified through the evidence review, is outlined below.

3.2.1 The Site's Location within the Green Belt

77. The IAMP AAP site is located within the Green Belt. The release of Green Belt (refer to the Exceptional Circumstances for Releasing Land from the Green Belt Background Technical Report¹⁷ (PSD12)), and the subsequent development of the released land would change the landscape character of the IAMP AAP site locally from open countryside to modern industrial development, in turn affecting the local visual amenity of the Green Belt. In line with South Tyneside LDF Core Strategy Policy EA1 and Sunderland UDP Saved Policy CN2 the openness of the Green Belt should be protected and enhanced. In accordance with Sunderland UDP Saved Policy CN5 the visual amenity of the Green Belt should not be harmed by development.

3.2.2 The Visibility of the Site

78. The visibility of the IAMP AAP site from surrounding settlements such as Fellgate to the north, from the Great North Forest Heritage Trail and surrounding PRow network, and from transport corridors, including the A19, represents a potential constraint, owing to the open and relatively flat nature of the landscape. There are two PRows within the northern part of the IAMP AAP site and the Great North Forest Heritage Trail, which runs along Follingsby Lane and Downhill Lane. There are also public views from elevated areas such as Boldon Downhill and Penshaw Monument (Grade I Listed Building).
79. Development within the IAMP AAP site would change the appearance of large parts of landscape from open countryside to modern industrial development. In line with Sunderland UDP Saved Policies CN5 and CN13 the visual amenity of the Green Belt and important public views should be protected and enhanced.

¹⁷ Arup (February 2017) Exceptional Circumstances for Releasing Land from the Green Belt Background Technical Report

3.2.3 Views Towards Landmarks

80. The open and flat landscape of the IAMP AAP site and the surrounding area allows long distance views across the countryside towards elevated landmarks such as Boldon Downhill and Penshaw Monument (Grade I Listed Building). Any development within the IAMP AAP site generally could reduce this visibility. In line with Sunderland UDP Saved Policies CN13 (SD16) important public views should be protected and enhanced. South Tyneside Landscape Character Study (SD45) highlights unimpeded views across the open countryside within Boldon Fell towards landmarks such as Penshaw Monument as a key sensitivity and recommends the retention of the open aspect and views. The City of Sunderland Landscape Character Assessment also recognises the open character of the landscape, which allows views towards Boldon Hill.

3.2.4 Existing Trees and Other Vegetation

81. Existing mature trees, woodlands, hedgerows and other structural vegetation within the IAMP AAP site represent a constraint towards development as they are important features within the area providing filtering of views from certain locations and contributing to the character of both the IAMP AAP site and the wider landscape. The removal of trees and vegetation within the IAMP AAP site would change the character of the landscape. In line with Sunderland UDP (SD16) Saved Policies CN1 and CN16, Sunderland Local Plan: Draft Core Strategy (SD17) and Development Management Policy DM7.20 and South Tyneside LDF Development Management (SD22) Policy DM1 existing trees and hedges should be protected.
82. The impact of the loss of trees and vegetation within the IAMP AAP site on biodiversity in terms of intrinsic value of habitats and their provision for wildlife is considered in the Ecology Technical Background Paper¹⁸.

3.2.5 Loss of Open Countryside

83. The IAMP AAP site is located in an area of open countryside largely comprising medium to large scale arable fields enclosed by hedgerows with pockets of woodland located along the River Don. Development of the IAMP AAP site would lead to a partial loss of this open countryside through the introduction of built form. In line with Sunderland UDP (SD16) Saved Policies CN2, CN7 and CN15 and Sunderland Local Plan: Draft Core Strategy and Development Management Policies (SD17) CS7.5 and DM7.18 and South Tyneside LDF Core Strategy Policy (SD22) EA1 open countryside should be protected.
84. The impact of open countryside within the IAMP AAP site on biodiversity in terms of intrinsic value of habitats and their provision for wildlife is considered in the Ecology Technical Background Paper¹⁸ (PSD14)

¹⁸ Arup (February 2017) Ecology Technical Background Paper (PSD14)

3.2.6 River Don

85. The River Don, including its winding course, its margins and vegetated edges, is an important feature within this landscape. Inappropriate development could adversely affect the character of this feature. In line with Sunderland UDP (SD16) Saved Policies CN1, Sunderland Local Plan: Draft Core Strategy and Development Management Policies (SD17) DM7.1 and DM7.19 and South Tyneside LDF Core Strategy Policy EA1 (SD22) landscape features such as the River Don should be protected and enhanced.

3.2.7 Listed Buildings

86. Listed Buildings and their respective settings can present constraints to the proposed IAMP development. There are several Listed Buildings within the IAMP AAP area site and the wider surrounding landscape including:
- Hylton Grove Bridge (Grade II Listed Building) which is located within the IAMP AAP site. The bridge and its setting form an important local landscape feature within the IAMP site;
 - Penshaw Monument (Grade I Listed Building, officially called the Earl of Durham's Monument) which is located approximately 4.4km to the south of the IAMP AAP site and the elevated location of Penshaw Monument means it is a highly prominent landmark with numerous views towards it from the wider landscape.
 - Scots House (Grade II* Listed Building), the stables at Scots House (Grade II Listed Building) and Scots House gatehouse, walls gates and gate piers (Grade II Listed Building) which are located to the north of the IAMP AAP site off the A184;
 - Boldon Fellgate Farmhouse (Grade II Listed Building) also located to the north of the IAMP AAP site off the A184;
 - Laverick Hall and linked outbuildings, and barn ranges at Laverick Hall (Both Grade II Listed Buildings) located to the north east of the IAMP AAP site off the A184;
 - Donhill House, the pair of lodge cottages at the entrance to Downhill House, Downhill Farmhouse, the limekiln to the south east of Downhill Farmhouse, and the barn and gin-gang to the south of Downhill Farmhouse (all Grade II Listed Buildings) are located to the north east of the IAMP AAP site across the A19; and
 - Usworth Hall Washington Development Corporation Headquarters (Grade II Listed Building) located to the west of the IAMP AAP site in Washington.
87. Development within the IAMP AAP site could adversely affect the setting of these heritage features. The Environmental Statement accompanying the IAMP Development Control Order (DCO) should consider this issue further and what mitigation may be appropriate. In line with Sunderland UDP (SD16) Saved Policy B10, Sunderland Local Plan: Draft Core Strategy and Development Management Policies (SD17) CS7.9 and DM7.8, and South Tyneside LDF Development

Management (SD22) Policy DM6 Listed Buildings and their setting should be protected.

3.2.8 Playing Fields

88. The area of playing fields known as Plessey Sports Field could provide a constraint to the proposed IAMP development. The NPPF, National Planning Practice Guidance (NPPG) and Sport England provide clear guidance on the acceptable circumstances for the development of playing fields. In line with the NPPF, NPPG, Sunderland UDP Saved Policy L4, Sunderland Local Plan: Draft Core Strategy and Development Management Policy (SD17) DM7.23, and the Sunderland City Council PPP the playing fields should be protected or alternative provision provided.

3.3 Potential Opportunities

89. Development within the IAMP AAP site offers opportunities to create strong links between biodiversity, flood/drainage and landscape proposals, to provide multifunctional spaces. Potential examples include:
- Integrating the creation of an area of open space/parkland with ecological mitigation and habitat creation, whilst enabling public access or views for recreation (provided access to ecologically sensitive areas can be controlled) and providing health benefits to employees would be in line with National Planning Policy, which seeks positive improvements in both the natural environment and people's quality of life; and
 - Planting trees, scrub and wet woodland around Sustainable Drainage Systems (SuDS) features such as ponds, to provide a valuable habitat and food source for species. This would be in line with Sunderland Local Plan: Draft Core Strategy and Development Management Policy (SD17) CS7.7, which seeks to ensure that development makes the fullest contribution to enhancing the biodiversity of priority habitats.

4 Interventions and Actions

4.1 Overview

90. This section summarises the key proposed interventions, mitigation measures and actions which are recommended for inclusion in the IAMP AAP and presents these under the following headings:

- Visual amenity of the Green Belt;
- Existing Trees and Other Vegetation;
- Landscape Buffers;
- River Don;
- Public Rights of Way;
- Listed Buildings;
- Open Space;
- New Planting;
- Building Height;
- Building Materials/Cladding;
- Massing of Buildings;
- Green and Brown Roofs;
- Green Walls;
- Sustainable Urban Drainage Systems; and
- Playing Fields.

4.2 Key Proposed Interventions to be Progressed Through the AAP

91. In accordance with National and local policy (both current and emerging) and the relevant Landscape Character Assessments, the following measures have the potential to help integrate the development into its surroundings and protect important landscape features.

4.2.1 Visual Amenity of the Green Belt

92. The Exceptional Circumstances for Releasing Land from the Green Belt Background Technical Report¹⁷ (PSD12) provides a clear justification for the release of Green Belt land within the IAMP AAP area.
93. With regards to the protection of visual amenity of the Green Belt, as required by Sunderland UDP (SD16) Saved Policy CN5 and protection of the openness of the Green Belt as required by South Tyneside LDF Core Strategy (SD17) Policy EA1, the IAMP AAP boundary has been minimised and located in the south of the wider IAMP AAP search area, adjacent to existing large scale industrial development. Wide bands of tree belt planting, in particular along the northern,

eastern and western edges of the IAMP AAP area, would provide some screening of views and help to integrate the proposed development with the surrounding countryside. These principles should be incorporated into the AAP policies.

4.2.2 Existing Trees and Other Vegetation

94. The retention of mature trees, woodland blocks and hedgerows would provide maturity and instant screening of the development as well as supporting existing wildlife (see also the Ecology Technical Background Paper¹⁸ (PSD14)). This would be in line with National Policy, Sunderland UDP (SD16) Saved Policy CN1, Sunderland Local Plan: Draft Core Strategy and Development Management Policy (SD17) CS7.9 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.3 Landscape Buffers

95. Surrounding the proposed development with a wide tree belt along the A19 and landscape buffer along the proposed development edges would help to maintain the perception of separation between settlements, would provide some screening of lower level views of the proposed development and may help protect the setting of surrounding properties including Listed Buildings. This would be in line with National Planning Policy, Sunderland UDP (SD16) Saved Policies B1, CN7, CN15 and WA21, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy DM7.19, South Tyneside LDF Development Management (SD22) Policy DM1 and the principles contained within South Tyneside SPD 3: Green Infrastructure.
96. Incorporating a wide (minimum 50m) landscape buffer incorporating a bund and tree planting along the A19 would maintain the appearance of separation between the IAMP AAP site and the housing to the east of the A19 as well as helping to maintain the amenity of the landscape. The buffer would help soften views, where possible, from the east. The introduction of a 50m buffer along the eastern edge of the IAMP site would continue the existing landscape buffer which runs along the western side of the A19 adjacent to the existing Nissan site, and would be in keeping with the surrounding landscape character. Opportunities for new walking or cycling routes could be incorporated within the buffer. A 50m buffer in this area would also have ecological benefits including screening the A19 to reduce collision between vehicles and birds and bats, and creating permeable links for wildlife along the edge of the site.
97. Incorporating a wide (minimum 20m) landscape buffer with trees and shrubs along the development edges to the north and west would soften the new settlement's edges in terms of views from the surrounding settlements and countryside, helping to protect the setting of surrounding properties and the Grade II listed Hylton Bridge and to maintain the appearance of settlement separation. This buffer would help form a robust boundary to the Green Belt. Paragraph 84 of NPPF requires that amended Green Belt boundaries should be defined using "*physical features that are readily recognisable and likely to be permanent*". A minimum 20m landscape buffer would allow this requirement of NPPF to be met

while providing a buffer between the development and the countryside.

4.2.4 River Don

98. Maintaining a wide landscape and wildlife corridor along the River Don within the IAMP AAP site (minimum 50m either side of the river) to protect and enhance this landscape feature for the benefit of wildlife and amenity would help continue the link of the existing green corridor, which reaches from the coast to the east towards the countryside to the west. This would support the aims of Sunderland UDP (SD16) Saved Policies CN1, CN15 and R1, Sunderland Local Plan: Draft Core Strategy and Development Management Policies (SD17) DM7.19 and DM7.20 and South Tyneside LDF Core Strategy (SD22) Policy EA1, South Tyneside LDF Development Management Policy DM1 and the principles contained within South Tyneside SPD 3: Green Infrastructure.

4.2.5 Public Rights of Way

99. The principle of incorporating improvements to the PRow and other rights of way network including surfacing and safety into the proposed development would support amenity benefits. Locating paths such as the Great North Forest Heritage Trail or other paths and cycle links along the River Don landscape corridor or other landscaped areas rather than through the built up area of the new development would help users to benefit from the green assets. Paths and access along the river should be set back from the water edge for health and safety and to protect ecological sensitive habitats and species along the River Don. Consideration should also be given to limiting motorised vehicle access to Follingsby Lane and promoting its use as a right of way. These measures would support the aims of Sunderland UDP (SD16) Saved Policies C1 and R1, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy CS7.1, South Tyneside LDF Core Strategy (SD22) Policy EA1 and South Tyneside LDF Development Management (SD21) Policy DM1.

4.2.6 Listed Buildings

100. In line with Sunderland UDP (SD16) Saved Policy B10, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policies CS7.9 and DM7.8, and South Tyneside LDF Development Management Policy DM6 (SD22), Hylton Grove Bridge (Grade II Listed Building) on Follingsby Lane should be retained and its setting within the River Don corridor enhanced as it forms an important landscape feature within the area.
101. The principles of incorporating a sufficient buffer between the development and Listed Buildings, using dense planting, lowering development height and breaking up the mass of the new buildings facing existing buildings and farms may help to conserve the setting of Listed Buildings. The Environmental Statement accompanying the IAMP DCO should consider this issue further and identify appropriate mitigation.

4.2.7 Open Space

102. Well-sited informal open space/parkland should be incorporated into the design for the use of local residents and employees to contribute to offsetting the impact on visual amenity from the loss of open countryside. It would also help to promote health benefits (both physical and mental), potentially integrating natural habitats such as rough grassland, meadow, woodland, ponds, trees and hedgerows as well as log piles and dead wood habitats. Marshy areas with reeds and rushes would create additional visual interest as well as wildlife benefits. This would be in line with Sunderland UDP (SD16) Saved Policies CN7 and CN15, Sunderland Local Plan: Draft Core Strategy and Development Management Policies (SD17) CS7.2, DM7.1 and DM7.19, South Tyneside Development Management Policy DM1 (SD22) and the principles contained within South Tyneside SPD 3: Green Infrastructure.

4.2.8 New Planting

103. New planting along the edges of the development that is native and appropriate to the local character, with a high proportion of deciduous planting as well as some native evergreen species, would enhance screening benefits, including during the winter months. See also Section 4.2.3. Incorporating large growing trees within the development, setting new buildings back from the road and allowing for a sufficiently wide green verge would help to break up the appearance of the hard built development form. Locating underground and overground services outside these verges, where feasible, would allow for tree growth.
104. Incorporating formal avenues of trees and tree lined streets within the development would improve legibility of the IAMP AAP site and create green links through the development for wildlife.
105. Landscape planting should be diverse and incorporate a large proportion of fruiting and flowering species to create a food source for wildlife. Planting should be locally sourced in the interest of sustainable development and plant establishment.
106. These measures would be in line with Sunderland UDP (SD16) Saved Policies B1, CN7, CN15 and WA21, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy DM7.19 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.9 Building Height

107. The consideration of locating larger buildings adjacent to existing industrial areas or the careful gradation of height of buildings through the site would be beneficial with regards to protecting long distance views towards landmarks such as Boldon Downhill and Penshaw Monument (Grade I Listed Building) and integrating the new development into its surroundings. This would be in line with Sunderland UDP (SD16) Saved Policies CN1 and CN13, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy DM7.1 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.10 Building Materials/Cladding

108. The detailed design of the IAMP should be addressed through a design code submitted as part of the DCO application. In general terms, the principle of using the building materials or cladding, such as non-reflective, matt cladding material for building facades and roofing, as well as using shades of natural green and grey, would help to integrate the buildings within their surroundings and make them less visually apparent within their wider setting. These measures would be in line with Sunderland UDP (SD16) Saved Policy CN1, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy CS7.2 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.11 Massing of Buildings

109. The principle of creating a sensitive built edge along the new development boundaries, for instance by considering to break up the typical industrial ‘big box’ architectural style, i.e. large scale, appearance of the proposed buildings towards the development edges, in particular towards nearby residential properties, as well as PRoW’s and other rights of way would help in the interest of visual amenity and to correspond to the human scale and proportion. This would be in line with Sunderland UDP (SD16) Saved Policy B1, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy DM7.1 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.12 Green and Brown Roofs

110. Incorporating green and brown roofs on buildings with a large footprint would help integrate the development in terms of views from elevated locations such as Boldon Downhill and Penshaw Monument and would create a green link for wildlife. Any green and brown roofs should be designed in collaboration with an ecologist for ecology mitigation. The inclusion of green and/or brown roofs within the proposed IAMP development would support the aims of Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policies DM7.1 and DM7.19, and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.13 Green Walls

111. Incorporating green walls, in particular along the development edges, would help to further screen the development. Green walls are vertical walls covered in vegetation, which can be in the form of climbing plants growing from the base of buildings and walls with an integrated plant growing medium. Green walls located continuously along a road and running through the development site can act as green links. The inclusion of green walls within the proposed IAMP development would support the aims of Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policies DM7.1 and DM7.19, and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.14 Sustainable Urban Drainage Systems

112. The principle of designing and maintaining swales and other Sustainable Drainage Systems (SuDS) features that incorporate shallow edges, wildlife friendly planting and areas of permanent water, could support recreational and visual amenity, and provide ecological and water quality benefits. These measures would support the aims of Sunderland UDP (SD16) Saved Policy CN1, Sunderland Local Plan: Draft Core Strategy and Development Management (SD17) Policy CS7.1, South Tyneside LDF Core Strategy Policy EA1 and South Tyneside LDF Development Management (SD22) Policy DM1.

4.2.15 Playing Fields

The area of playing fields known as Plessey Sports Field will be retained on the site until deemed surplus to requirement by an up-to-date Playing Pitch needs assessment, in consultation with Sport England. Should the playing fields be required for development prior to being evidenced as surplus to requirements, they should be re-provided elsewhere in the local authority area. This would be in line with National Planning Policy, Sunderland UDP (SD16) Saved Policy L4, Sunderland Local Plan: Draft Core Strategy and Development Management Policy (SD17) DM7.23, Sport England's Planning Policy Statement and the Sunderland City Council PPP.