

SUNDERLAND CORE STRATEGY & DEVELOPMENT PLAN

EXAMINATION IN PUBLIC

REPRESENTATIONS [2]

1. I am instructed by Mr & Mrs Ebdale of Howbridge House, Mary Carruthers of Pawz for Thought and a number of objectors to the removal of land at North Hylton from the green belt and the allocation of Growth Area HGA7.
2. The relevant objections references are in Statement 1.

PREAMBLE

3. I hold a Bachelor of Arts degree in Town and Country Planning from the University of Newcastle upon Tyne and the Common Professional Examination from the University of Northumbria. I have been a Chartered Town Planner since 1989 and practised in local government, the National Parks and the private sector for twelve years. I was also called to the Bar at Grays Inn at Trinity 1999. I have worked in the planning sector as a planner and barrister for around 30 years. I also specialise in Chancery matters and Local Government judicial reviews.
4. I have wide ranging experience encompassing all areas of planning from advertisement control through general development management, retail impact assessment and heritage assets. As an advocate I represent both local authorities and private clients in relation to development control and local plan issues. I have considerable experience in writing, assessing and applying local plan policies. I have represented local councils in the Examinations of three Core Strategies and numerous other LPs.
5. I make this statement in my capacity as both a Barrister at Law and a Chartered Town Planner.

INTRODUCTION

6. The Publication Draft version of the Core Strategy and Development Plan ("the LP") was subject to consultation from 15 June to 27 July 2018. This LP is the basis of the Examination.
7. The site HGA7 at Ferryboat Lane is proposed for deletion from the statutory green belt and allocated as a "Growth Area" to accommodate 110 houses.
8. I have already made submissions to Sessions 1 & 2 in relation to general questions which are relevant to this allocation.
9. This statement relates to Session 8 which is site specific to allocation HGA7.

SESSION 8 – Q2 do GB assessments support HGAs and are exceptional circumstances demonstrated

10. The LP has been under preparation for years and the Green Belt Review started in 2016. However exceptional circumstances were not articulated by the Council until June 2018.
11. The starting point is that one of the essential characteristics of the green belt is its permanence and their general extent is established. One of the key considerations when amending boundaries is sustainability. The composite test for green belt alteration is that exceptional circumstances exist which necessitate changes. As stated in earlier sessions the exceptional circumstances have not been demonstrated. The PBA report published in June 2018 is ex-post facto and inherently unreliable. In any event the LP does not articulate why it is necessary to remove this site from the green belt. This will be discussed below in terms of the site's inherent characteristics.
12. In my view the case for exceptional circumstances for taking the site out of the green belt has not been demonstrated and furthermore the constraints show that the site is not suitable for development in any event. The individual characteristics of this site are such that mitigation is unlikely to be effective. In particular, building on this site will cause irreversible harm to the character of the incised woodland valley, the key views from the A19 and Claxheugh Rocks will be lost and protected wildlife will be adversely affected.

SESSION 8 – Q3.1 does the updated HRA indicate devt will have no significant effect on Coastal sites

13. This issue was also addressed in Session 1 at the start of the Examination. The updated HRA was published on 26 April 2019, 14 days before evidence was due for submission. There is no explanation of why the council and Natural England have completely changed their position between December 2018 and April 2019. Given the council has a statutory duty to assess the likely effect of plans and programmes on sites of European importance then it is incumbent on it to disclose the evidence for its position.
14. Secondly there does not appear to be an assessment of the likely effects of the policies of the CSDP in combination, or the cumulative impact of the plan as a whole, on the European sites qualifying features. Again this is a statutory duty under the Habitat Regulations.

SESSION 8 – Q3.2 is the Council satisfied constraints to development can be adequately mitigated

15. There is still no clear explanation of why it is necessary to remove site HGA7 from the green belt. The Strategic Land Review assessed sites in 2016 in terms of their suitability for development. Notwithstanding the basic requirement to justify taking the site out of the green belt, its development was also found to have high impacts in terms of the following –
 - the designated Area of High Landscape Value
 - the setting of the principal panoramic view of Sunderland from A19 and Claxheugh
 - Biodiversity; including European sites, protected species, the wildlife corridor and LNR
 - groundwater flooding
 - the Green Infrastructure corridor and natural greenspace
 - restricted road capacity, and
 - being remote from local services

As far as I am aware the majority of these constraints still pertain to site HGA7. The most up to date assessment includes reference to the AHLV and important views across the site.

16. The SHLAA of January 2018 noted these constraints and found this site [416B] to be undeliverable, being in the GB, and also having multiple site constraints.
17. The assessment of this site's suitability for development does not take account of –
 - the site now has a TPO on it (only made in April 2019)
 - it is an area identified for Landscape Protection¹
 - the key views across the site to Peshaw Monument and Claxheugh Rocks
 - the LCA recommends no skyline development in the Incised Lowland Valley and no development to encroach on or obstruct recreational routes
 - the C2C route alongside this site is used by around 20,000 cyclists every year²
 - the narrowing of the wildlife corridor will adversely affect³ connectivity and functionality
18. There is no evidence before this Examination which addresses the significant constraints to development of this site as set out above. The letter from Mary Carruthers at NMA1 gives a flavour of the biodiversity on the adjacent site and in the surrounding area.
19. The developer Hellens submitted documents to the earlier round of consultation, but not to the Submission Draft plan, which purported to address these constraints. These documents are also inadequate in a number of respects. A phase I Survey was undertaken in 2017. The purpose of the survey was stated as being to “map and identify habitats and species...and to provide baseline data of the site and highlight areas for further investigation that may provide a constraint to development”. However the scope of the survey to inform development of the site was limited in a number of respects –
 - it was undertaken on 2 days in August after the summer bird breeding season and before wintering birds appear
 - no record of weather, duration and time of day (birds are more active at dawn and dusk)
 - no recognition of strategic and local wildlife corridors and their relevance to the two LNRs and four SSSIs within 2kms and links to the mudflats and saltmarshes on the Wear
 - it asserts that most of the trees have rot holes whereas the council has recently assessed the majority (eight) as having a predicted lifespan of 40-100 years
 - the holes and crevices are ideal for bats and birds, but were not checked
 - otter and water vole were dismissed as being on the site due to lack of habitat, the wildlife corridor and stream which they move along was not considered
 - the follow-up surveys for breeding birds and bats were not undertaken
20. This survey is also as odds with the Council's Development Framework which plainly accepts there are protected and priority species in the area, including breeding and wintering birds, bats and GCN (albeit there is no suggestion of GCN in the pond). The conclusion being that further survey work will be required to understand the full impact of the development. In

¹ Landscape Character Assessment 2015 [SP47] - Landscape Strategy Figure 3.2

² Sustrans figure for 2019

³ Letter 23 July 2018 Naturally Wild Ecology

circumstances where the council must prove that it is *necessary* not simply desirable or convenient to remove this site from the green belt the lack of reliable information to prove exceptional circumstances renders any such argument sterile.

21. A Landscape and Visual Assessment (“LVA”) was undertaken in August 2017. The Assessment does not take account of the key views across the site towards Penshaw Monument and from Claxheugh Rocks. The conclusion that housing on this site would not affect landscape character (which is a lowland valley and in this area pasture and amenity woodland, still set within a dense woodland network) or the openness of the green belt are flawed. Further the mitigation for new housing in the open countryside, and the impact on landscape character, are rather cautiously expressed as being *potentially reduced* by planting and design⁴. The assertion that the A19 would be a robust boundary to the edge of the settlement rather ignores the fact that it oversails the lowland incised valley (Landscape type 3a) which remains continuous and intact beneath it and flows across this site. The open countryside character of the site and its physical and functional relationship to the incised valley can be seen in the submitted photographs.
22. The selection of this site above others is based on “environmentally sustainable and relatively accessible locations”, basically its sustainability. The contextual analysis of the site in the Development Framework purports to show that the site is within walking distance of schools and the metro in South Hylton. Given the river Wear lies between the site and these services this is nonsense. The analysis shows the bus stop on Ferryboat Lane, but this is disused. Access to other bus stops will require crossing of the critically busy A1231.
23. The Development Principles and Design Parameters recognise that noise mitigation will be required to the A1231, substantial highways improvements to Ferry Boat Lane and junctions, further ecological survey work (again) and buffer zones. As stated above there is no certainty that these constraints can be overcome or adequately mitigated. The assertion that design can mitigate impact on the green belt and wildlife corridor are flawed. The actual loss of land which performs three purposes of green belt designation can never be mitigated by design. Secondly part of the wildlife corridor, its connectivity and functionality, will be lost permanently and cannot be mitigated by design.
24. To justify green belt deletions it is necessary to create new defensible boundaries that will endure. The NPPF states that boundaries should be based on physical features that are readily recognisable and likely to be permanent⁵. The PBA report asserts that HGA7 will be contained to the west by the A19⁶ (simply wrong as a matter of fact and implies only a desk based exercise). The new western boundary proposed by the Council was found to be arbitrary and PBA recommended it be changed. However the line drawn across a field in the open countryside to the south is claimed to be “generally robust”. It is plain that the proposed boundaries do not meet the advice of NPPF, the lack of defensible and robust boundaries can be seen on the aerial photograph at NMA2.

⁴ LVA §4.6.2 & §4.9.2

⁵ NPPF §85

⁶ PBA GB Part 2 [SD34] §4.67

25. As stated earlier submissions this site was assessed in 2016⁷, 2017⁸ and 2018⁹ and was identified as part of the strategic GI corridor and having multiple site constraints. Given the council is now, rather suddenly, adopting the opposite view that the site is suitable for development it is critical that this decision is properly substantiated. On the present evidence there is gross failure to justify exceptional circumstances as required by the NPPF.

SESSION 8 – Q3.4 Is the site deliverable?

26. The lack of reliable evidence on a significant number of constraints to development indicate that deliverability is not reasonably predicted. More importantly the council has recorded protected and priority species associated with this site and its close proximity to Local Wildlife Sites. As far as I am aware there has been one limited Phase I Survey which recommends additional survey work¹⁰ and no proper assessment for species moving through the site on the wildlife corridor. The council is the 'competent authority' in terms of making policies and plans and it has a duty to assess the impact of allocations including in combination with other plan and projects.
27. The Development Framework notes that further survey work for species and habitats will be required to understand the full impact of the development¹¹. In the circumstances whereby protected and priority species may be present and there is a designated strategic wildlife corridor on the site it is inappropriate to allocate it for housing before undertaking this work.
28. It is recorded that otter live and breed on the Wear. The occupiers of Howbridge House see otter spraint by the stream on their land¹² which connects via the stream alongside HGA7 and onward to the Washington Wildfowl Centre near Nissan.
29. Even if site HGA7 is removed from the green belt any development would have to comply with the other policies of the plan. These other policies would place substantial constraints on development, for example –
- The impact on protected species in the area would have to be properly assessed and no adverse impact proven and net gains in biodiversity provided (NE2)
 - The wildlife corridor is protected and development which would affect its value and integrity would be resisted (NE2)
 - The recreational value of greenspace in an area of deficit would require replacement¹³
 - The impact on landscape character must be outweighed by benefits (NE9)
 - The panoramic views to Penshaw and Claxheugh should be preserved (NE11)

In the circumstances it is difficult to see how all the above can be met if the site is developed for 110 houses.

⁷ Strategic Land Review

⁸ SHLAA

⁹ Appendix L North Sites Assessments

¹⁰ AES Limited 2017

¹¹ DF Contextual Analysis - Ecology

¹² see letter attached NMA3

¹³ Policy NE4 and Sunderland GI page 22 – deficit in Castletown and North Hylton riverside

CONCLUSION

30. The overall conclusions to the objectors case is as follows –
- the OAN is unreasonably ambitious at 30% over ONS 2014 figures
 - the OAN is unreasonably ambitious having regard to the Standard Method benchmark
 - the OAN is unreasonably ambitious taking account of market conditions (Nissan + IAMP)
 - therefore the OAN will not be deliverable
 - the potential contribution to land supply from brownfield sites has not been quantified
 - the contribution from non green belt land in Durham has not been proven
 - the exceptional circumstances for greenbelt amendments have not been demonstrated
 - in any event the quantum of deletions far exceeds the identified shortfall of land
 - in selecting this site for development its sustainability has been misrepresented
 - this site is not appropriate for allocation in any event due to significant constraints
 - the biodiversity value of the area including HGA7 is materially underestimated
31. The overall conclusion is that the case for exceptional circumstances has not been demonstrated, but even if green belt deletions were justified in principle this site is wholly unsuitable for development at all.
32. For all of the above reasons, including submissions made to the earlier session, the plan is not sound or deliverable.

MISS NICOLA ALLAN
MRTPI

10 May 2019



May 2nd 2019

Statement of case for examination in Public

Session 8 Tuesday 4 June 2019 Matter 7 The Strategy and Housing Growth Areas for North Sunderland

NE6 Green Belt, Strategic SP4, Site Policy SS4, HGA7 North Hylton

2. Identification of sites

To remove Site HRA7 from the Green Belt is in conflict to National Planning Policy Framework guidelines and contrary to SCC's own policies.

The case for '**exceptional circumstances**' has not been adequately argued. In the original Green Belt Assessment SSC it was well argued that HGA7 was integral to the GB, landscape, wildlife corridor etc and totally inappropriate for release being unsuitable for development. This original document 'disappeared' and was replaced by a document ignoring previous assessments and recommending release! Some of the new assessments were strange.

The presence of the Green Belt is integral to major landscapes within the city. It is the 'long green lung' stretching into the City so important to the attractive landscape which is integral to the 'promotion of inward investment'. The release of this part of the GB would result in a housing estate in a field in the middle of one of the most iconic views into the City. As SCC includes HRA7 within the area of protected landscapes I can only believe that they agree!

This part of the the Green Belt serves its purpose. It is continuous from the city centre into the countryside and beyond. Despite erroneous statements to the contrary by PBA it has excellent connectivity inland and beyond as it runs under A19. It is a clear demarcation to the intensive development north of the A1231, there are no residential developments south of A1231 and the River in a corridor stretching from the City inland to Washington and beyond. The release of HRA7 and subsequent development would set an unfortunate precedent.

The GB separates the hamlet of North Hylton from the dense development to the north of A1232. There is no reference to this hamlet with its charm, history and character in any document pertaining to HRA7. There are 7 dwellings and a pub in North Hylton, to add an estate of 110 houses is surely not appropriate.

The GB at this point, North of the River Wear, is narrow and incorporates Strategic Wildlife Corridor/Green Infrastructure. East/West it runs continuously punctuate only by well spaced buildings and narrow lanes which do not detract either visually, from the quality landscape, or from the free movement of wildlife.

'Create a secure well defined new Green Belt boundary' NPPF. The GB northern boundary is secure and well defined by A1231. To facilitate HGA7 it is proposed to take a 'bite' from the northern boundary A1231 The new arbitrary boundaries that are proposed are neither secure nor well defined, almost impossible to defend

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and having no 'regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period' NPPF In fact the release of HRA7 from the GB would devalue the GB in this area so much that there would be no argument for any GB to remain east of A19. I note that Hellens have already asked for adjacent land to become 'safeguarded'.

Is there a minimum width for GB to remain viable? I can find no reference to it in NPPF. The suggested 'new' boundaries leave a pinch point of mere metres, much of it the tarmac of Ferryboat Lane. This appears to have 'little regard' to its permanence in the 'long term' and I doubt it will 'endure' this plan yet alone beyond 'the plan period' The width of the remaining GB north of the River Wear is unviable and leaves the GB east and west indefensible

3 HGA7 - North Hylton

3.2 Mitigation

- One **cannot** mitigate against the loss of Green Belt, which serves its purpose, at HRA7. It will effectively result in the total loss of GB east of the A19
- One **cannot** mitigate against intruding and despoiling important strategic views of the city. Identified as from the elevated positions of A19 Bridge and Claxheugh Rock by SCC. No amount of 'sensitive design and planting' can mitigate for placing an isolated housing estate in a field within the stunning view from these vantage points of the GB. In their landscape assessment SCC have committed to protect these views
- How does one mitigate for the loss of veteran trees? Their presence adds an extra dimension to the strategic views. 'Sensitive landscaping' with a few 'estate' saplings will never replace the visual or ecological value of veteran trees, especially the oaks. I cannot see how leaving the trees in the development would be an option as once the root runs are protected the land available for 'development' would be so reduced that one must question its viability. Veteran trees are usually considered an unsuitable inclusion in a development and are felled for the very reason they are classified as veteran. Ten of these trees are now subject to a TPO for their landscape value.
- The GB/Strategic Wildlife Corridor is so narrow at this point that there is no land available to mitigate for HRA7 intrusion into the Strategic Wildlife Corridor. SCC are committed to 'protecting and enhancing these corridors and improving connectivity where there is a weakness.' HRA7 all but severs the corridor north of the River. It is not just the footprint of the 110 houses with the associated infrastructure that would be detrimental to the biodiversity but the pollution caused by light, noise, traffic, people and pet pressure etc. It is difficult to understand how supporting an intrusion of this magnitude can be considered protecting the corridor. Few would improve connectivity by advocating severance!
- The Coastal European Directives will not be adversely effected[3.1] and I appreciate that the nearby SSSIs are geological but where is the data on the flora and fauna of adjacent environs to HRA7?. I have been unable to find any specifics on Sites of Local Conservation Interest within SCC other than that they have been surveyed by Durham Wildlife Services. There is so much more to SCC duty of care 'to protect and enhance biodiversity' than to say they are adhering to European Directives as the easy option
- I fail to understand why there appears to be a reluctance for engagement with the public. Financially it would be impossible for SCC or any other LA to rely purely on external bodies to survey the Borough. Sites must be surveyed and monitored throughout the year, in all weathers at all times of day if a com-

prehensive picture of the biodiversity is to be completed. If one doesn't know what is there one cannot 'protect and enhance'. Corridors by definition are to facilitate the free movement, impossible to monitor in a snap visit.

- HRA7 is surrounded by a mosaic of habitats that are of biodiversity interest and integral to the Strategic Wildlife Corridor. The site is host to veteran trees considered prime habitat for insects, birds and bats - especially the oaks. The woodlands, scrub and hedgerows offer feeding, roost, nest sites for birds, mammals and insects; the linear features are a flyway for hawking bats. Grassland/wildflowers are home to many insects, moths, butterflies and mammals so important in the food chain to higher species. HRA7 is adjacent to the River Wear with its mud flats and saltmarshes with their associated flora and fauna. Most of these habitats would be highlighted by other LAs The stream which bisects the site is a wildlife link which originates on the Nissan site. Yet none of this has been noted anywhere. The Hellens Ecological survey is of little consequence as it appears to be a cursory glance, neither time of day nor duration of visit has been included. Many observations are open to question and in some cases just wrong.
- The saltmarsh/mudflats will be adversely effected by increase footfall of people and domestic animals causing disturbance and damage to plants and animals. Saltmarsh flora is always of interest and often rare; the fauna, mainly birds often in large numbers, can be seen feeding and roosting. The River Wear wildlife corridor is Strategic because it is important as a major flyway for migrants, a stopping off point for refuelling and a home for residents including the otter, which breed just below the site
- The lack of a boundary hedgerow south of HRA7 not only detracts from the biodiversity and connectivity but also exasperates the run off from the field causing problematic flooding of Ferryboat Lane
- I believe there is an over estimate of the housing needs. Opportunities for imaginative use of other sites has not been fully explored. To earmark GB release at HRA7 for a 110 housing estate is totally wrong. There can be few places where the landscape, character and biodiversity of one of the hidden 'gems' of the City would be more adversely effected. Sequentially there are many more appropriate sites. Windfalls? The Civic Centre? A site which surely must become available within the Plan period.
- This is an isolated housing estate in a field. Being remote from all amenities it is traffic generating development with no active bus stop. Traffic would discharge onto A1231 at a small congested junction. Partly due to gradients any infrastructure improvements would need to be extensive and have to be facilitated by reducing the size of the development site or further ingress into the remaining GB/ Wildlife Corridor.
- There is very little mention of the site adverse impact on the Coast to Coast cycleway, ridden by many thousand each year. Not only the impact on the view greeting riders but also the dangers of a narrow lane becoming a busy road.
- Are 110 houses realistic? Is that figure for one or two fields? If all environmental constraints are observed ie the TPO veteran trees are retained and protected, the wooded stream is retained and enhanced, buffer zones to neighbouring environs and the footpath are planted. Is there not a requirement to supply greenspace within a development? All this coupled with the necessary infrastructure, especially the access road, appears to make 110 dwellings somewhat ambitious.

The number of errors within much of the evidence can only be explained by the fact that there has been a

lack of site visits. No decision of this magnitude should be decided on a laptop. We find it distressing the developers are already on site doing what appears to ground investigations and marking distances. Is this not very presumptuous and illustrate the 'uneven playing field' we have felt throughout the whole process

To remove HRA7 from the GB is totally inappropriate. There appears to be so much conflicting evidence from various aspects of SCC one wonders why it was ever included. 'Exceptional circumstances' have not been proven especially as there appears to be gross over estimation of housing needs

The release of HRA7 is just wrong and irreversible. If agreed it will be to the detriment of Sunderland, its inward investment and its people for years to come!

M.P.Carruthers

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Lynne Ebdale

Dear Sir,

Re land at North Hylton

We bought our property 10 years ago. It was at that time a very neglected piece of land, surrounded by agricultural land to the west, north and east. Since moving in we have constantly been working and improving to create an extensive haven for wildlife in the area. We planted over 1400 trees in the first winter. This included a species rich wildlife hedge principally at the request of SCC planners to improve the connectivity of the wildlife corridor. We looked to extend the woodland with standard native trees and whips.

We have a stream that originates from the Nissan site and is culverted under the A19 this flows along a veteran tree stand in the middle of the two fields and enters my land at the northern corner where it flows down the eastern edge over a waterfall down the gut and enters a culvert. Origins of this stream are assiduously ignored in all the documents despite it being clearly shown on maps. It is an obvious wildlife link. The creation of the meadow has markedly increased the diversity of butterflies, moths and other insects. Continual monitoring of the site has produced an extensive but certainly not exhaustive records of the biodiversity on site - Fauna there are 83 species found in the meadow 70 species of fauna in the wood 27 in and around the pond 72 species of fauna around the house and entrance and there will be many more, we have over 2500 recent sonograms of bats this gave us records on 7 different species, 125 species of macro moths and butterflies have been recorded so far, 6 different species of bee, 14 species of mammals including otter and 91 species of birds some 23 species have breed here, the invertebrates are toads, frogs and smooth newts and 4 species of dragonflies. We are now teaching ourselves entomology and Mycology and as the insect and fungi on site are interesting and we need to learn more. Obviously as birds and animals know no boundaries, they use the adjacent site HRA7 and in particular the wooded stream.

There are breeding otters on the River Wear below the site and regular spraint on my site. We don't shout about them as we don't want them disturbed. Footprints are seen both in the mud and when we have had snow. When visitors are lucky enough to see them playing there is always much excitement.

The River Wear is a major river for wildlife different times of the day I often wish I had the time to sit and view a whole day the tide comes in and goes out it changes minute by minute birds feed in the mud and salt marsh. The corridor is a highway for feeding and migrating birds. I cannot see why SCC don't take more interest in it.

There are hare, deer and grey partridge in the fields, songbirds in the hedgerows, owls calling and bats feeding at night - and this is all within Sunderland. It is also a place where light pollution is limited, and the night skies can be viewed. Some nights it can be inky black once

you get away from the street lights. I found the Hellen's habitat survey really quite depressing and in places totally inaccurate, rabbits have never been abundant in the years I have lived here, in fact I have seen many more hares than rabbits. It is also interesting that they consider the hedge specified by Durham Hedgerow, the grant giver, as species poor. I was also depressed by the response I got from SCC biodiversity officer when I invited him to visit, He said it was inappropriate for him to visit at this time.

Very little has been mentioned about the wildlife corridor or sites of local conservation interest. This Strategic wildlife corridor is a mosaic of habitats including the open fields of HRA7 the woodlands to the southwest and east of the fields the River Wear Gorge to the south with the mud flats and Salt Marsh, LNR and SSSIs.

Nothing has been mentioned about the tiny historic hamlet of North Hylton and its unique character.

North Hylton is a hamlet of 7 quite unique dwellings full of character and history. Turning off A1231 at the roundabout onto Ferryboat Lane you immediately feel the difference. Dropping from a busy fast bustling noisy world into a tranquil green area, it feels like you are dropping back in time. Travelling downhill on a narrow lane towards the River, the Lane bends to the right and narrows even more to a width where cars passing have to pull to one side and one car normally stops while the other car passes. We even have a different refuse collection vehicle as the normal ones find it too difficult to maneuver down Ferryboat Lane.

The first dwelling you see is Tarrill an established dog boarding kennel this is situated at the nearest point to the proposed development, barking dogs that are set off by noises which will be heard! I can hear them, and I am some distance away. This property is known as the Kellogg's house as it was won in a Kellogg's cornflake competition! Then Oak Tree Lodge, a public house in years gone by called "The Oak" origins of the dwelling hark back to the 1800s. This residence has a quirky collection of interesting items displayed and placed around the outside of the house and gardens. Cress House is at the bottom of the bank on your right. Previously known as "The Dead House" being where bodies found in the River were taken. Story goes you were paid more for taking the bodies to Cress house than taking them to the south bank of the river. Behind Cress house is Howbridge House, along from Cress House you come to The Shipwrights Pub, a Grade2 Listed Building dating back over 350 years. It is said this is the oldest pub in Sunderland, stories of the press gang adorn the walls. Next to the Shipwrights is Whitehouse cottage not quite as old as the Shipwrights but still very old and was once a Post Office. Along the river bank you come to the Manor House dating back to the early 1700 's there is also a small secluded house at the end of the Lane, Dawson's Manor Lodge.

On The southside of the Lane there is The Moorings also known as "The Boat Graveyard". A haunting mysterious place that is home to number of old vessels the largest being "The Sunderland 2", the last barge built on the River Wear and now lies rotting slowly on the riverbank along with numerous other smaller vessels.

North Hylton is a special place shared by the many people who walk and cycle down Ferryboat Lane and use the footpaths and tracks. Ferryboat Lane is also part of the Coast to Coast cycle route. The number of cyclists that complete the C2C route using this part of the route are many, many, many thousand each year. There are also many thousand who use it for shorter

day trips. There are woodland/river paths that lead all the way to Washington enjoying the unbroken landscape of the Greenbelt/wildlife corridor/green infrastructure they are largely unspoilt and very natural.

I found it very distressing that it is obvious that few if any of the decision makers have visited the site. Those that have appear to come to very different conclusions hence the discrepancies between SCC Policies and their actions

I would invite you to spend some time on this land and appreciate its special landscape quality. The photographs really don't show the beautiful views across the valley and the open countryside to the west. The view from the A19 bridge shows the green wedge of land stretching right into the City.

The proposed development is an isolated housing estate remote from all amenities. The nearest shop to buy milk and a newspaper is almost a mile away in Castletown on the opposite side of the busy A1231. It's not what I would say is walking distance. The nearest supermarket is about 2 miles. The services in South Hylton including the Metro, are over the River and certainly not within walking distance presuming that swimming is not an option! They are more than 3.5 miles by road. There is no timetable bus.

I would ask you to stand at the top of the site and listen to the traffic on the A1231, notoriously congested. It is a continuous drone punctuated by sirens and certainly not conducive to residential development: and that is before considering the emissions especially from the idling engines of heavy goods vehicles

This is clearly a traffic generating development. The junction with the A1231 is congested and difficult at the best of times, impossible without winter tyres in winter. The infrastructure improvements to facilitate easy access to A1231 would appear to require a large amount of land to allow for the gradient. Where is this land going to be found?

North Hylton is remote from the hustle of the rest of Sunderland it's a haven with startling views and a different feel that is the reason we thought it ideal ten years ago to have a rescue for wildlife there within the boundary of Sunderland a rural area in the greenbelt an ideal safe place to invest our time and efforts into creating a rescue that is second to none in the north east area.

When the Draft Core Strategy appeared in August 2017, I was innocent. I was quite heartened to find a document, which I have photocopied many times, Green Belt Review Part 1 SLR REF 804 SHLAA ref? in which SCC describes as

'this area forms a major portion of the Strategic Green infrastructure and wildlife corridor alongside the River Wear and provides much of the setting to one of the principal and identifiable panoramic viewpoints of Sunderland both from the A19 bridge and also from Claxheugh Rock. The River Wear estuary provides a vital green lung within the urban area of Sunderland which supports the attraction of inward investment into the city Part of the riverside area is protected as a Local Nature Reserve. In addition, there is considerable historic value relating to North Hylton settlement and the adjacent woodland is subject to Tree Preservation Orders. There are few buildings remaining within the settlement and accessibility is limited'

After thorough considerations of the site this document goes on to conclude under 'Suitability and Deliverability', Site Appraisal Conclusion

'Site is not considered suitable for development'

The authors of these documents appear to have been two of the few people who have visited and not relied on drawing lines on a computer map.

Yet this was promptly disregarded by SSC and the site has become suitable for development! I am a mere resident, but I fail to understand how the assessment of suitability of a site can change so drastically within the planner's eyes when on the ground it remains the same. Without doubt there is an assumption that this development will go ahead regardless, as surveys and test holes have been dug and markings have appeared on the field and groups of various house builders and surveyors have visited.

This site is also part of the protected landscape when reading the Draft Green Infrastructure, I found the Green Belt Boundary map had been altered instead of following the boundary of the A1231 it was now drawn excluding the proposed development site from the green belt, letters to my MP and council prompted a reply of it was a mistake and would be rectified. Is this really the level playing field of open government we are led to expect?

From the outset of this procedure I feel that it has been almost impossible for the ordinary person to understand and documents so difficult to find, when I asked to buy a hard copy of the Core Strategy Development Plan I was told there was only three hard copies ever produced and I would find one of these copies in the Library if I wanted to peruse it!

The loss of the Green Belt at HRA7 cannot be right. It cannot be mitigated for or replaced and once lost it is gone forever.

Areas like this cannot be recreated they have evolved over centuries
I ask again that you visit the site.

Yours faithfully
Lynne Ebdale



7th MAY 2019.

NMA2 – PROPOSED GREEN BELT BOUNDARY ACROSS OPEN FIELD



LAND AT FERRYBOAT LANE

1. VIEW FROM SOUTH OF RIVER
2. VIEW FROM FERRYBOAT LANE TO WEST
3. VIEW TO MILLENIUM BRIDGE
4. VIEW TO A1231
5. VIEWS TO PENSHAW MONUMENT
6. FOOTPATH ALONG SITE















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