EX20.002



Core Strategy and Development Plan

Report of Representations for Main Modifications – A, B, C, D & E

November 2019

SUNDERLAND LOAL PLAN CSDP – MAIN MODIFICATIONS CONSULTATION

REPORT OF REPRESENTATIONS – A, B, C, D & E

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Plannir Anderson, A.953340, MMC49 d
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Name Ava Anderson

15 October 2019

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Yours faithfully,

Appleton,KH.953384,MMC3

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Appleton, P.953381, MMC4

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Senior Planning Officer Planning Strategy Commercial Development Dire Sunderland City Council Civic Centre Sunderland SR2 7DN	ectorate 2 5 DCT 2019	l agr Plan Deve Name ALAN ASKEW	
15 October 2019			
Dear Sirs		Pos	
CORE STRATEGY AND DI	EVELOPMENT PLAN		

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- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy.
 Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1.
 The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land.

CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes Railway SAM is retained". This is impossible with development of HGA1.

- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
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Yours faithf

Senior Planning Officer Planning Strategy Commercial Development Directorate Sunderland City Council Civic Centre Sunderland SR2 7DN	1	l agree to my data being used by Sunderland Cou Plai Askew, A.949749, MMC161 Dev Name AUDCEY ASKED	egy and
15 October 2019	j	•	
Dear Sirs		F	******
CORE STRATEGY AND DEVELOPMENT P	LAN	* **	

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- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

To whom it may concern.

I wish to officially oppose and wholeheartedly object to the development planned for green belt land at Penshaw.

We need to preserve our green belt land for the environment, ourselves and future generations to enjoy.

Not every bit of land needs to have houses built on it. Please stop this happening , as there will be no land left soon.

Green belt land should be left as it is and is not supposed to be built upon.

The residents of Penshaw and many other people passing through enjoy unrivalled views of Penshaw and Herrington country park and wish it to remain this way.

And we should be able to enjoy it and for a long time to come.

Why do you think that this is acceptable to use our green belt land?

I seriously object to development on our green belt land.

Yours sincerely.

Sandra Ballantyne. Resident of Penshaw.

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nior Planning Officer nning Strategy nmercial Development Directorate Iderland City Council ic Centre Iderland	I agree to Banning, MP.953976, MMC333 Planning Development Plan process. Name	d the
October 2019 2 5 OCT 2019		
ar Sirs	Postcode	
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Development Plan Representation

Sunderland Core Strategy and Development Plan 2015-2033 Main Modifications

On behalf of Barratt David Wilson Homes (North East) (George Washington Hotel – HGA3)

October 2019





I. Introduction

- 1.1. Spawforths have been instructed by Barratt David Wilson Homes (North East) (BDW) to submit representations to the Sunderland Core Strategy and Development Plan 2017-2033 – Main Modifications for their site at George Washington Hotel (North of High Usworth – HGA3).
- 1.2. BDW welcomes the opportunity to contribute to the emerging Local Plan for Sunderland and is keen to further the role of Sunderland within the North East Region as a whole.
- 1.3. BDW has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.
- 1.4. BDW would like to make comments on the following topics and sections in the Draft Plan:
 - MM4 Policy SP3
 - MM5 Policy SS2
 - MM15 Policy H1
 - MM16 Policy H2
 - MM21 Policy BH1
- 1.5. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- I.6. BDW welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public, if necessary.
- 1.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.



2. National Planning Policy Context and Tests of Soundness

- 2.1. The Council submitted the Plan for Examination prior to 24 January 2019. Therefore under the new NPPF transitional arrangements the policies contained in the 2012 Framework will apply. The comments in these representations therefore refer to and utilise the 2012 Framework.
- 2.2. The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes. The sites identified to meet the housing target must be deliverable and developable.
- 2.3. In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.
- 2.4. In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:
- 2.5. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:



Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.10. This document therefore considers the content of the Main Modification consultation document on behalf of BDW in light of this planning policy context.



3. MM4 - Policy SP3: Washington

3.1. BDW is **supportive** of Main Modifications relating to HGA3 North of High Usworth.

Test of Soundness

3.2. BDW considers that the Local Plan is currently **sound** in relation to HGA3.

Which test of soundness are comments about?				
х	Positively Prepared	x	Effective	
х	Justified	×	Consistency with National Policy	

Justification

- 3.3. BDW **supports** the recognition within the proposed new paragraph that Site HGA3 North of High Usworth is a sustainable and deliverable site which "represents a logical rounding off of the village" and that "site constraints can be minimised and suitably mitigated for".
- 3.4. BDW would like to emphasise and as demonstrated in earlier representations and Hearing Statements the proposal is an appropriate site to provide for the housing needs of the City in the short term. The allocation of the site would confirm its potential to help continue the provision of a balanced housing supply in the City in sustainable locations. The site can deliver a full range and mix of housing and a sustainable community. Development of the site would deliver housing and affordable housing. Sunderland needs to have a robust housing trajectory and the site at North of High Usworth, Washington would assist with this delivery in the short term. The site is situated within a prime location suitable for residential development and as such would facilitate the development of land in a more effective and efficient manner. Development of the site would not harm or undermine the areas wider policy objectives, but seeks to reinforce the need to develop sites within sustainable locations as a priority.



3.5. The site is available, suitable and achievable and therefore deliverable in accordance with Framework Footnote II.

Proposed Change

3.6. No Change.



4. MM5 - Policy SS2: HGA3 North of High Usworth

4.1. BDW is concerned with some of the aspects of the proposed Main Modifications.

Test of Soundness

4.2. BDW considers that the Local Plan is currently **unsound** and BDW recommend changes to ensure that it can be made sound.

Which test of soundness are comments about?				
х	Positively Prepared	×	Effective	
х	Justified	x	Consistency with National Policy	

Justification

- 4.3. BDW supports the deletion of criterion iii, vi and vii. The removal of these criterions reflects BDW's concerns from their original objections and discussions at the Examination in Public.
- 4.4. BDW also supports the modification to criterion v, which inserts flexibility and pragmatism into this aspect of the policy.
- 4.5. However, BDW is concerned that the modification to criterion iv inserts reference to screening and acoustic buffers to the <u>south</u> to address noise implication from the A194(M). However, this additional wording was not discussed or raised at the Examination in Public and there are no noise issues to the south of the site, which is a residential area.
- 4.6. As previously stated BDW has undertaken a Noise Assessment for the site which shows that noise is not a significant issue for the site. The Noise Assessment only recommends an acoustic barrier around the gardens of a number of properties and some enhanced glazing with the tree belt retained where possible.



- 4.7. BDW therefore suggests the following wording for Policy stem iv): retain as much of the existing tree belt boundary along the boundaries where possible.
- 4.8. BDW is similarly **concerned** with the new criterion vi which seeks improvements to the permissive footpath between Stone Cellar Road and A195 at Follingsby. This new requirement is accompanied by no evidence and is therefore not justified. It also appears wholly excessive requiring the improvement of a permissive footpath and therefore outside the control of BDW for over I mile outside the boundary of the site. Furthermore, a permissive footpath is over private land and is not a right of way. The landowner has granted permission for the route to be used by the public but the landowner also has the right to withdraw that permission.
- 4.9. BDW therefore consider and is agreeable to the improvement of the footpath within the confines of the site and suggests amending the proposed Main Modification as follows:

Seek improvements to the permissive footpath within the site.

Proposed Change

- 4.10. To overcome the objection and address soundness matters, the Council should:
 - Amend criterion iv as follows: iv): retain as much of the existing tree belt boundary along the boundaries where possible.
 - Amend criterion vi as follows: Seek improvements to the permissive footpath within the site.



5. MMI5 – Policy HI: Housing Mix

5.1. BDW is supportive with aspects of the Main Modifications to Policy H1.

Test of Soundness

5.2. B BDW considers that the Local Plan is **sound** with the proposed Main Modification.

Which test of soundness are comments about?				
х	Positively Prepared	×	Effective	
х	Justified	×	Consistency with National Policy	

Justification

5.3. BDW is supportive of the principle of the proposed Main Modifications to Policy H1 which recognises that in some instances it may not be possible to deliver accessible and adaptable homes. Furthermore, the proposed modification also establishes a transitional period indicating that standards for accessible and adaptable homes will not apply those applications for reserved matters where outline permission was determined or is subject to resolution to grant permission before I April 2021. This approach addresses some of the concerns that BDW raised during the Examination in Public.

Proposed Change

5.4. No change.



6. MMI6 – Policy H2: Affordable Housing

6.1. BDW is supportive with aspects of the Main Modifications to Policy H2.

Test of Soundness

6.2. BDW considers that the Local Plan is **sound** with the proposed Main Modification.

Which test of soundness are comments about?				
	х	Positively Prepared	×	Effective
	х	Justified	x	Consistency with National Policy

Justification

6.3. BDW is supportive of the proposed change which states that "where it is not possible to deliver the affordable housing requirement in full, a viability assessment should be submitted in line with the requirements of the PPG". BDW considers that this addresses some of their comments and concerns with regards to the impact of policy requirements and the delivery of affordable housing and creates the necessary flexibility to the policy.

Proposed Change

6.4. No change.



7. MM21 – Policy BH1: Design Quality

7.1. BDW **supports** the proposed Main Modifications.

Test of Soundness

7.2. BDW considers that the Local Plan is **sound** with the proposed Main Modification.

Which test of soundness are comments about?				
	х	Positively Prepared	×	Effective
	х	Justified	x	Consistency with National Policy

Justification

7.3. BDW **supports** the Main Modification, which implements a transitional period for Nationally Described Space Standards. BDW considers that this approach is pragmatic as it will not apply those applications for reserved matters where outline permission was determined or is subject to resolution to grant permission before I April 2021. This approach addresses some of the concerns that BDW raised during the Examination in Public.

Proposed Change

7.4. No Change.



Development Plan Representation

Sunderland Core Strategy and Development Plan 2015-2033 Main Modifications

On behalf of Barratt David Wilson Homes (North East) (Washington Meadows)

October 2019





I. Introduction

- 1.1. Spawforths have been instructed by Barratt David Wilson Homes (North East) (BDW) to submit representations to the Sunderland Core Strategy and Development Plan 2017-2033 – Main Modifications for their site at Washington Meadows.
- 1.2. BDW welcomes the opportunity to contribute to the emerging Local Plan for Sunderland and is keen to further the role of Sunderland within the North East Region as a whole.
- 1.3. BDW has significant land interests in the area, which can positively contribute towards the economic and housing growth agenda.
- 1.4. BDW would like to make comments on the following topics and sections in the Draft Plan:
 - MM4 Policy SP3
 - MM6 Policy SS3
 - MM38 & 40 Implementation and Monitoring
- 1.5. In each case, observations are set out with reference to the provisions of the Framework and where necessary, amendments are suggested to ensure that the Local Plan is found sound.
- 1.6. BDW welcomes the opportunity for further engagement and the opportunity to appear at the Examination in Public, if necessary.
- 1.7. We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.8. Please do not hesitate to contact us to discuss any issues raised in this Representation further.



2. National Planning Policy Context and Tests of Soundness

- 2.1. The Council submitted the Plan for Examination prior to 24 January 2019. Therefore under the new NPPF transitional arrangements the policies contained in the 2012 Framework will apply. The comments in these representations therefore refer to and utilise the 2012 Framework.
- 2.2. The Government's core objectives as established through the National Planning Policy Framework (the Framework) are sustainable development and growth. Paragraph 14 of the Framework stresses the need for Local Plans to meet the objectively assessed needs of an area. The core planning principles are set out at paragraph 17. These include that planning should make every effort to proactively drive and support sustainable economic development to deliver the homes and businesses that the country needs. Plans should take account of market signals and allocate sufficient land to accommodate development within their area. The key focus throughout the Framework is to build a strong, competitive economy and to deliver a wide choice of high quality homes. The sites identified to meet the housing target must be deliverable and developable.
- 2.3. In relation to Local Plan formulation, paragraph 150 of the Framework states that Local Plans are the key to delivering sustainable development which reflects the vision and aspirations of the local community. The Framework indicates that Local Plans must be consistent with the Framework and should set out the opportunities for development and provide clear policies on what will and will not be permitted and where.
- 2.4. In relation to the examination of Local Plans, paragraph 182 of the Framework sets out the tests of soundness and establishes that:
- 2.5. The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:



Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;

Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.10. This document therefore considers the content of the Main Modification consultation document on behalf of BDW in light of this planning policy context.



3. MM4 - Policy SP3: Washington

3.1. BDW is **supportive** of Main Modifications MM4 in so far as it confirms the safeguarding of land to the East of Washington, but is **concerned** that this land is not allocated for housing.

Test of Soundness

3.2. BDW considers that the Local Plan is currently **unsound** and BDW recommend changes to ensure that it can be made sound.

Which test of soundness are comments about?				
	х	Positively Prepared	x	Effective
	Х	Justified	x	Consistency with National Policy

Justification

- 3.3. BDW is supportive of the confirmation that the land to the East of Washington is safeguarded through Policy SS3. BDW is also supportive of the removal of sites at East Springwell and Rickleton following discussions at the Examination in Public. This removes 260 dwellings from the Plan in the Washington Sub-Area. Other sites removed from the Plan include North Hylton which was anticipated to deliver 110 dwellings within the plan period. Therefore, in totality the Local Plan has lost 370 homes from the Plan, which is a not insignificant number. This is particularly significant in the Washington Sub-Area and nearly 45 percent of the originally proposed new housing has been removed from the Plan.
- 3.4. The removal of a number of housing sites and a significant level of new housing has effectively removed the flexibility in the Plan. BDW is concerned that the proposed Main Modifications do not replace this loss in housing. BDW recognises that the proposed Main Modifications suggest that the release of safeguarded land will be considered through the Allocations and Designations Plan. However, BDW considers that given the need for



new housing in Sunderland that the safeguarded site at Washington Meadows should be allocated now for housing. This is further explain in response to Main Modification MM6.

Proposed Change

- 3.5. To overcome the objection and address soundness matters, the Council should:
 - Allocate the safeguarded site at East Washington for housing.



4. MM6 - Policy SS3: Safeguarded Land

4.1. BDW is **supportive** of Main Modifications MM6 in so far as it confirms the safeguarding of land to the East of Washington, but is **concerned** that this land is not allocated for housing.

Test of Soundness

4.2. BDW considers that the Local Plan is currently **unsound** and BDW recommend changes to ensure that it can be made sound.

Which test of soundness are comments about?				
:	×	Positively Prepared	x	Effective
:	×	Justified	x	Consistency with National Policy

Justification

- 4.3. BDW **supports** the confirmation through the proposed Main Modification to paragraph 4.46 that "the council will give consideration as to whether an early release of the safeguarded land is justified through the emerging A&D Plan". However, BDW consider that the site should be allocated for housing immediately to aid the much needed delivery of new housing in the area. This is amplified by the removal of 260 dwellings from the Washington Sub-Area through the Main Modifications and the lack of flexibility in housing in general through the emerging Local Plan.
- 4.4. BDW therefore maintains their concern that flexibility needs to be incorporated into the plan and insufficient housing land has been identified. Furthermore, with the identification and progress at IAMP additional housing land needs to be identified in Washington. This will deliver the greater flexibility the plan requires along with delivering new housing alongside new employment creating an engine for growth that will deliver and support the growth ambitions of Sunderland.


- 4.5. BDW has prepared and submitted a Delivery Statement and Masterplan Framework (which was appended to earlier Hearing Statements). These demonstrate that the site is available, suitable and achievable and therefore deliverable in accordance with national guidance. The site can also deliver significant environmental, economic and social benefits which are explained in the Delivery Statement and Masterplan Framework. The site has been fully assessed and can come forward in the short term to address the housing needs of the area.
- 4.6. BDW therefore supports the site's release from the Green Belt for safeguarded land, but consider that the site should be allocated for housing. This matter was discussed at the Examination in Public where it was agreed that safeguarded sites are effectively the Council's reserve allocations, which will be released when needed. BDW maintain that need is now given the loss of new housing sites in Washington through the Main Modifications.
- 4.7. Alternatively BDW consider that the new sentence at the end of para 4.46 should be more positively worded to explain that the Council will release the safeguarded land through the emerging A&D Plan to address the shortfall in housing in the Washington Sub-Area.

Proposed Change

- 4.8. To overcome the objection and address soundness matters, the Council should:
 - Allocate the safeguarded site at East Washington for housing.
 - Amend the new sentence to read the Council will release the safeguarded land through the emerging A&D Plan to address the shortfall in housing in the Washington Sub-Area.



5. MM38 & MM40 – Implementation and Monitoring

5.1. BDW **is supportive** with aspects of the Main Modification but considers that further clarity is needed.

Test of Soundness

5.2. BDW considers that the Local Plan is currently **unsound** and BDW recommend changes to ensure that it can be made sound.

Which test of soundness are comments about?				
х	Positively Prepared	x	Effective	
х	Justified	х	Consistency with National Policy	

Justification

- 5.3. BDW **supports** the clarity in paragraph 14.19 (MM38) that a plan review can be any part of the Local Plan, including the Core Strategy, IAMP AAP or the Allocations and Designations Plan.
- 5.4. BDW also supports the inclusion of the Implementation and Monitoring Framework as part of the Local Plan as Appendix 8 (MM40). However, BDW is concerned that the clarification and discussion from the Examination in Public has not translated to modifications in the Monitoring Framework itself. SS3 still states that the land to the East of Washington is protected for development beyond the plan period. BDW considers given the context above and the proposed Main Modifications that this just states that the land is *protected for development*. Similarly, in relation to actions one remedy that should be cited is the release of safeguarded land.



Proposed Change

- 5.5. To overcome the objection and address soundness matters, the Council should:
 - Amend the Monitoring framework as follows in relation to SS3:
 - Amend policy objective to be "identifies and protects land to the east of Washington for development".
 - o Add in potential action or contingency: "release of safeguarded land"

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Senior Planning Officer Planning Strategy Commercial Development Directorate Sunderland City Council Civic Centre Sunderland	Bartle, J. 1229858, MMC306 D Name Miss Julie BARTLE
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CORE STRATEGY AND DEVELOPMENT PLAN

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Senior Planning Officer Planning Strategy Commercial Development Directorate Sunderland City Council Civic Centre Sunderland SR2 7DN 2 5 NCT 2019

15 October 2019

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Core Strategy and Development Plan 2015-2033 Proposed Main Modifications

Consultation Comment Form



Proposed Main Modifications Consultation Comment Form

Please use this form if you intend to make a representation in response to the consultation on the proposed Main Modifications to the Sunderland Core Strategy and Development Plan (CSDP).

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The period for making representations runs for six weeks between Friday 13 September 2019 to Friday 4.45pm 25 October 2019. Representations received after this deadline will not be accepted.

Representations should only relate to the legal compliance and/or the soundness of the Proposed Main Modifications and made within the six-week period. Representations relating to other parts of the Plan will not be considered.

Please note that you should include all information, evidence and supporting information which is required to support your representation and any suggested changes.

All comments that relate to the Main Modifications and which are received within the consultation period (as set out above) will be considered by the appointed Planning Inspector as part of the Examination.

The Form of Schedule of Proposed Main Modifications

All policy numbers, paragraph numbers and figure numbers set out in the Schedule of Proposed Main Modifications relate to the Sunderland Core Strategy and Development Plan Consultation Publication Draft (SD.1).

This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

- **Positively prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective the plan should be deliverable over its period and based on effective joint working on crossboundary strategy priorities; and
- **Consistent with National Policy** the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Legal compliance with regards to plan making generally refers to the Core Strategy and Development Plan meeting legal requirements under Section 20 (5) of the 2004 Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations, 2012.

It is important that you fill in your contact details below. We cannot register your representation without your personal details.

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name, organisation (if relevant) and comments may be made available to the public, in Council committee papers or as otherwise considered appropriate by us. Your personal data i.e. postal addresses, emails and telephone numbers **will not** be shared with the public.

However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.
1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	The Burdon Lane Consortium	Lichfields
Address Line 1		
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

2. Which Main Modification does your representation relate to?

Main Modification Reference	ММ
MM26	Policy NE2

3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

X Yes No

4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	Yes	X No
Justified	Yes	X No
Effective	Yes	X No
Consistent with National Policy	Yes	X No

5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.

We respond on behalf of our client (The Burdon Lane Consortium) in relation to the proposed changes to Policy NE2 (MM26).

MM26 includes changes to both Policy NE2 and the supporting text at paragraphs 10.9 -10.14. We consider that changes are needed to ensure the policy is justified and effective.

Consistent with our client's comments submitted previously, we request a change to subpoint 6 as follows to include text which acknowledges the benefits which development can offer in providing Green Infrastructure in the wildlife corridors.

"...

6. Development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor. <u>Support will be given to development</u> which enhances the provision of Green Infrastructure in the wildlife corridors."

Paragraph 10.9 relates to Habitats Regulations Assessment (HRA) and instances where Strategic Access Management and Monitoring (SAMM) and/ or the provision of Suitable Alternative Natural Greenspace (SANG) may be required. Our client requests a revision to the final sentence of paragraph 10.9 to ensure the policy and paragraph is justified, effective and consistent with other parts of the plan. Whilst our client welcomes the recognition that provision of SANG could also contribute to the other open/green space requirements, we do not agree with the reference to useable greenspace.

Our client has also responded to MM32 (Policy 4) where the reference to usable greenspace is also proposed as a modification. As explained in this response, this conflicts with the list of (11) bullet points in paragraph 10.23 which clarifies what comprises greenspace. As 'usable greenspace' is not defined in the Plan, this could lead to uncertainty about what will be expected on-site. Therefore we proposed that "useable" is deleted from 10.9 (and Policy NE4):

"10.9…

Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained. Where a SANG is proposed as mitigation for HRA impacts, depending on the use and form that the SANG takes it may be possible for this to also be utilised as useable greenspace providing the uses are compatible."

The above changes are required to make the policy justified and effective.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

As explained in our client's response to Question 5, we request the following change to Policy NE2 and paragraph 10.9 to make the policy justified and effective:

6. Development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor. <u>Support will be given to development</u> which enhances the provision of Green Infrastructure in the wildlife corridors."

"10.9…

"

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7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.

N/A

8. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date:

Completed forms should be returned to:

Email: planningpolicy@sunderland.gov.uk; or Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN





Core Strategy and Development Plan 2015-2033 Proposed Main Modifications

Consultation Comment Form



Proposed Main Modifications Consultation Comment Form

Please use this form if you intend to make a representation in response to the consultation on the proposed Main Modifications to the Sunderland Core Strategy and Development Plan (CSDP).

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These modifications are set out in the Schedule of Main Modifications which is the focal point for this consultation. These are changes considered necessary by the Planning Inspector to make the plan sound. In support of the Main Modifications, a number of supplementary documents have also been published, including an Addendum to the Sustainability Appraisal.

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The Form of Schedule of Proposed Main Modifications

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The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

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However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	The Burdon Lane Consortium	Lichfields
Address Line 1		
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

2. Which Main Modification does your representation relate to?

Main Modification Reference	ММ
MM28	Policy NE4

3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

X Yes No

4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	Yes	X No
Justified	Yes	X No
Effective	Yes	X No
Consistent with National Policy	Yes	X No

5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.

We respond on behalf of our client (The Burdon Lane Consortium) in relation to the proposed changes to Policy NE4 (MM28).

MM28 includes a change in the wording in subpoint 3(i) from amenity greenspace to <u>usable</u> greenspace. For the reasons below, we do not consider this change to be justified and we therefore request that the change is reverted to the original policy wording.

The purpose of Policy NE4 is to detail the requirements relating to the provision of Greenspace. Paragraph 10.23 in the supporting text then proceeds to define Greenspace and sets out a list of 11 bullet points. These bullets are helpful in providing clarity as to what would be considered to comprise greenspace.

As 'usable greenspace' is not defined in the Plan, this could lead to uncertainty about what will be expected on-site. Therefore, we do not consider the MM32 to be justified. As such, we request that subpoint 3(i) is reverted back to the original wording, as set out below:

"…

i. a minimum of 0.9ha per 1000 bedspaces of *amenity*useable greenspace on site, unless..."

The above changes are required to make the policy justified and effective.

Notwithstanding this, we welcome the change to the table which follows paragraph 10.26. This change includes a reduction from the assumed 5 bedspaces to 4 bedspaces per three bedroom dwelling – which we consider to reflect a more reasonable assumption regarding occupancy.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

As explained in our client's response to Question 5, we request the following change to Policy NE4 to make the policy justified and effective:

"…

i. a minimum of 0.9ha per 1000 bedspaces of <u>amenity</u>useable greenspace on site, unless..."

The above changes are required to make the policy justified and effective.

7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.

N/A

8. Declaration

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Signed:

Date:

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Core Strategy and Development Plan 2015-2033 Proposed Main Modifications

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It should be noted that the Council has also prepared a Schedule of Additional Modifications. This sets changes which are minor in nature (such as typographical and factual errors and updates). These are not subject to consultation but are published for information only. The consultation only concerns proposed Main Modifications and the supporting Sustainability Appraisal Addendum and not other aspects of the plan.

The period for making representations runs for six weeks between Friday 13 September 2019 to Friday 4.45pm 25 October 2019. Representations received after this deadline will not be accepted.

Representations should only relate to the legal compliance and/or the soundness of the Proposed Main Modifications and made within the six-week period. Representations relating to other parts of the Plan will not be considered.

Please note that you should include all information, evidence and supporting information which is required to support your representation and any suggested changes.

All comments that relate to the Main Modifications and which are received within the consultation period (as set out above) will be considered by the appointed Planning Inspector as part of the Examination.

The Form of Schedule of Proposed Main Modifications

All policy numbers, paragraph numbers and figure numbers set out in the Schedule of Proposed Main Modifications relate to the Sunderland Core Strategy and Development Plan Consultation Publication Draft (SD.1).

This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

- **Positively prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective the plan should be deliverable over its period and based on effective joint working on crossboundary strategy priorities; and
- **Consistent with National Policy** the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Legal compliance with regards to plan making generally refers to the Core Strategy and Development Plan meeting legal requirements under Section 20 (5) of the 2004 Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations, 2012.

It is important that you fill in your contact details below. We cannot register your representation without your personal details.

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name, organisation (if relevant) and comments may be made available to the public, in Council committee papers or as otherwise considered appropriate by us. Your personal data i.e. postal addresses, emails and telephone numbers **will not** be shared with the public.

However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

1. Your Details

	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	The Burdon Lane Consortium	Lichfields
Address Line 1		
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

2. Which Main Modification does your representation relate to?

Main Modification Reference	мм
MM35	Policy SP10

3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

X Yes No

4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	Yes	X No
Justified	Yes	X No
Effective	Yes	X No
Consistent with National Policy	Yes	X No

5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.

We respond on behalf of our client (The Burdon Lane Consortium) in relation to the content in Policy SP10 (MM35) to reiterate comments made previously which we consider to be necessary in order to make Policy SP10 effective and consistent with national policy.

The first sentence in Policy SP10 indicates that some of the works will be funded by developer contributions. Whilst our client does not oppose this reference, Policy SP10 should be consistent with the planning obligations tests (NPPF 2012 paragraph 204) and Community Infrastructure Levy Regulations 2010. The works should also explore other funding sources and seek developer contributions as a last resort.

Accordingly, our client suggests the following revision to the first sentence in Policy SP10:

"...

To improve connectivity and enhance the city's transport network, the council, working with its partners and utilising developer contributions <u>(where justified and in the absence of other funding sources)</u> will seek to:..."

The above changes are required to make the policy effective and consistent with national policy.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

As explained in our client's response to Question 5, we request the following change to Policy SP10 to make the policy effective and consistent with national policy:

"…

To improve connectivity and enhance the city's transport network, the council, working with its partners and utilising developer contributions <u>(where justified and in the absence of other funding sources)</u> will seek to:..."

The above changes are required to make the policy effective and consistent with national policy.

7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.

N/A

8. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date:

Completed forms should be returned to:

Email: planningpolicy@sunderland.gov.uk; or Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN





Core Strategy and Development Plan 2015-2033 Proposed Main Modifications

Consultation Comment Form



Proposed Main Modifications Consultation Comment Form

Please use this form if you intend to make a representation in response to the consultation on the proposed Main Modifications to the Sunderland Core Strategy and Development Plan (CSDP).

If your comments relate to more than one Main Modification you will need to complete a separate form for each representation.

Following the submission of the Publication Draft CSDP for independent Examination to the Secretary of Statement in December 2018, a number of public hearing sessions were held between Tuesday 21 May 2019 and Thursday 13 June 2019. In response to issues raised during the hearing sessions, as well as representations made to the publication draft CSDP (Regulation 19) and taking into account the independent Planning Inspector's 'PostHearing Advice–Main Modification and Related Matters' report (EX18.002) published in July 2019, the Council are undertaking a consultation on a number of proposed Main Modifications.

These modifications are set out in the Schedule of Main Modifications which is the focal point for this consultation. These are changes considered necessary by the Planning Inspector to make the plan sound. In support of the Main Modifications, a number of supplementary documents have also been published, including an Addendum to the Sustainability Appraisal.

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This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

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	Your details	Agent details (if applicable)
Name		Neil Westwick
Organisation/Group	The Burdon Lane Consortium	Lichfields
Address Line 1		
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

2. Which Main Modification does your representation relate to?

Main Modification Reference	мм
MM10	Policy SS6

3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?

X Yes No

4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	Yes X No
Justified	Yes X No
Effective	Yes X No
Consistent with National Policy	Yes X No

5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.

We respond on behalf of the Burdon Lane Consortium (consisting of Taylor Wimpey, Persimmon Homes and Story Homes) ("our client") in relation to Land North of Burdon Lane which forms a key element of the South Sunderland Growth Area (SSGA) (Policy SS6).

By way of an update since the examination, a hybrid planning application (Ref. 19/01497/HY4) has been submitted to the Council for:

"Hybrid Planning Application – Full Planning permission for 532 residential dwellings (Use Class C3) with associated infrastructure and landscaping;

Outline planning permission (all matters reserved except access) to erect up to 397 residential dwellings (Use Class C3), a neighbourhood centre (comprising 2.4 hectares of development including a 1.5 form entry school and uses from within use classes A1, A3, A4, D1 & D2), associated infrastructure and landscaping."

Our client's written statement to Matter 7 (Strategies and Allocations for South Sunderland), sets out amendments to Policy SS6. Subsequent to this, a document which detailed a further revision to the suggested changes was submitted during the hearing sessions (ref. EX17.007) to assist the discussions between the parties during the examination.

The proposed changes to Policy SS6, as set out in MM10, are generally welcomed; however, there are some instances where our client considers that changes are still needed to ensure the policy is effective and consistent with national policy.

Subpoint 3 (a) (i)

Our client's suggested changes include a limit of no more than 500 sqm (gross external area) in the provision of Use Class A1 to ensure there is no conflict with Policy VC2 – which requires a retail impact assessment to be undertaken where the provision of Use Class A1 exceeds this quantum.

Subpoint 3 (a) and the draft SSGA SPD [SD.36] (page 61) require that the neighbourhood centre should complement (rather than compete with) existing centres. Setting a threshold in Policy SS6 consistent with the provisions of Policy VC2 so that a retail impact assessment would not be needed for the SSGA would ensure that there would not be an unacceptable retail impact on existing centres, as per the principles of the SSGA SPD. As such, the proposed amendment below will ensure that the policy is effective and consistent with other aims of the CSDP.

i. a range of appropriate uses from the following use classes: A1<u>(up to 500 sqm gross external</u><u>area)</u>, A3, A4, D1 and D2;

Subpoint 6

Our client proposes an amendment to subpoint 6 – which relates to the delivery of allotments – to clarify that they can be **provided on site or off site via a financial contribution**.

We are not aware of any of the applications within the SSGA which include the provision of allotments on site and we therefore consider that our client's proposed revision to subpoint 6 would make the policy more flexible and therefore effective.

Subpoint 7 / paragraph 4.61

In our client's earlier requested changes to subpoint 7, relating to ecological mitigation, we sought acknowledgement in the policy that in instances where Suitable Alternative Natural Greenspace (SANG) is provided that this would also contribute to the open/green space requirements of a development.

Whilst this has not been included in Policy SS6, we recognise that modifications are proposed to paragraphs 4.61 and 10.9 which follow this theme. These paragraphs refer to that *"it may be possible for part of this to be used for public open space"*. The proposed changes do not go far enough to satisfy our client's concerns. To ensure Policy SS6 and the supporting text is effective, we require the following change to paragraph 4.61 (and 10.9):

"... (depending on the form that the SANG takes, *it may be possible for part of this to also be used* for **the provision of SANG on site will also contribute towards the** public open space <u>requirements</u>)."

Subpoint 10

As explained during the hearing session, our client's development proposals (Ref. 19/01497/HY4) will deliver a section of the Ryhope-Doxford Link Road (RDLR) between Burdon Road and Eltham Road meaning that there would only be a single short section of the RDLR which remains outstanding.

The site subject to this planning application is the last of the 4 parcels within the SSGA to come forward with a planning application and it is understood that Section 106 contributions have been secured as part of the other approved developments to secure funding towards the delivery of the outstanding sections.

As our clients would fund and deliver the section of the RDLR between Burdon Road and Eltham Road, which will be a substantial scheme cost, it would not be reasonable to impose a further request for a financial contribution towards the remaining section of the RDLR. The following change below is requested to provide clarity on this matter and to ensure the policy is effective and consistent with national policy (and the planning obligation tests sets out in NPPF (2012) paragraph 204.

10. contributions to support the completion of the Ryhope-Doxford Link Road (by either delivery as part of development or via a financial contribution).

Final sentence of Policy SS6 / paragraph 4.73

The final sentence of Policy SS6 (MM10) requires that all development should be in accordance with the SSGA SPD. As explained in our client's Matter 7 hearing statement and orally at the hearing session, a draft SPD [SD.36] has been prepared for the SSGA. The preparation of this; however, pre-dates the CSDP and it has not been formally tested. Our client has submitted representations to a consultation on the draft SSGA SPD in October 2017; however, the SSGA SPD has not been subject to any further revisions or further consultation. As currently drafted, it is considered that the SPD is overly prescriptive and does not take into account issues of viability and deliverability.

The final sentence of Policy SS6 could be interpreted to read that development should be in accordance with the SPD even in its draft state which has yet to be updated following the consultation in 2017. In its current form, there is no justification for development to fully accord with a document which is subject to unresolved objections.

Notwithstanding this, it is understood that the Council intends to update the SPD; however, it is unclear when this will take place and also whether amendments to the document will be incorporated to reflect our client's previous representations and the emerging proposals for land north of Burdon Lane which are now subject of the hybrid planning application (Ref. 19/01497/HY4). The application proposals have been developed over a lengthy period and are based on significantly more detailed baseline and commercial information than was available to the Council in the preparation of the SPD. This results in a deliverable application scheme that follows the principles of the SPD but which has certain features; such as the alignment of the section of the RDLR and roundabout on to Burdon Road, in differing locations to those shown in the indicative figures in the SPD. Therefore, the scheme would never be able to be in full accordance with the SPD but is deliverable and will comply with the principles and objectives set by the Council.

In addition, and given that the SSGA is likely to come forward over a period of around 15 years, it also essential that it allows flexibility for the delivery of the site. For these reasons, we request the following revision to the final sentence of Policy SS6 (and paragraph 4.62 (or 4.73 as shown in EX19.008)):

All development should be in **general** accordance with the SSGA SPD."

Summary

With the above changes to Policy SS6 and the supporting text, our client considers that this would provide the appropriate balance between providing clear requirements and sufficient flexibility.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

Our client requests the following changes (<u>underlined</u> and in **bold**) to Policy SS6 (MM10) to reflect the comments in Question 5:

"Sites within SSGA include Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. These sites are allocated to create a new high quality, vibrant and distinctive neighbourhood.

Development should deliver:

- 1. approximately 3000 new homes to be broadly distributed across the four sites as follows:
- i. Chapelgarth approximately 750 homes;
- ii. Land North of Burdon Lane approximately 1,000 homes;
- iii. Cherry Knowle approximately 800 homes; and
- iv. South Ryhope approximately 450 homes;
- 2. 10% affordable housing;

3. a neighbourhood centre within Land North of Burdon Lane to provide a focal point within the SSGA and complement nearby existing centres which will comprise:

i. a range of appropriate uses from the following use classes: A1 (up to 500 sqm gross external area), A3, A4, D1 and D2;

ii. a new 1.5 form entry primary school which will also serve as a community hub;

iii. wheeled Sports Area;

iv. formal play space;

v. Multi Use Games Area;

vi. 3G pitch;

vii. appropriate parking facilities and served by bus service;

- 4. extensions to two existing primary schools in close proximity to SSGA;
- 5. public open space;

6. allotments to be provided on site or off site via a financial contribution;

7. suitable ecological mitigation in line with HRA requirements;

8. cycleways and footpaths;

9. new and improved public transport services and infrastructure; and

10. contributions to support the completion of the Ryhope-Doxford Link Road (by either delivery as part of development or via a financial contribution).

All development should be in general accordance with the SSGA SPD."

To ensure consistency, the final change should also be reflected in paragraph 4.62 (or 4.73 as shown in EX19.008):

"In order to ensure the comprehensive development of the sites and ensure that the necessary infrastructure is delivered at the right time, the council is preparing the South Sunderland Growth Area Supplementary Planning Document (SPD). Once adopted, all development on the SSGA should be in **general** accordance with this document."

As referenced in the response to Question 5, we also request the following revision to the supporting text in paragraphs 4.61:

"... (depending on the form that the SANG takes, it may be possible for part of this to also be used for the provision of SANG on site will also contribute towards the public open space requirements)."

Please also refer to our client's responses to MM26 and MM28 which relate to the proposed changes relating to the terminology of greenspace.

7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.

N.A

8. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed:

Date:

Completed forms should be returned to:

Email: planningpolicy@sunderland.gov.uk; or Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN


Senior Planning Officer Planning Strategy Commercial Development Directorate Sunderland City Council Civic Centre	I ag Burn,FJ.1134466,MMC173 Plar Development Plan process. Name	il and the gy and
Sunderland SR2 7DN 25 OCT 2019		
15 October 2019		
Dear Sirs		10 6 3 5
CORE STRATEGY AND DEVELOPMENT PLAN		

- a. Political developments and further uncertainty since the production of the Core Strategy and Development Plan, and since the closing date of the consultation, mean that the number of jobs on which the housing need is predicated is very much in doubt and therefore cannot be used as justification for deletion of precious greenbelt land. The time is not right to take such an irreversible decision.
- b. Public Transport: The site is not served by public transport. The Council's Doc EX17.008 Bus Operation Frequency is inaccurate and misleading. The bus stops shown on the plan as 'Springwell School', Springwell Village North & South' and 'Mount Lane' merely serve scholars and a part time (10am-4.50pm Mon-Sat) mini-bus shuttle service that is entirely unsuitable for travelling to major conurbations and employment sites, within reasonable timeframes. By the nature of this service, journeys are extremely lengthy.
 Commuters travelling to Gateshead, Newcastle or Sunderland must use the stops in the centre of the village or for Sunderland only, Peareth Hall Road. Both are much more than 800metres from HGA1. The reality is that people living on HGA1 will travel by car, incurring all of the attendant adverse affects on environment, wildlife and ecology. The proposed development is not sustainable.
- c. The stated intention to achieve "a logical rounding-off of the village, with the creation of a new durable Green Belt boundary" makes no sense and is unnecessary in this location. The existing boundary is an integral part of the character and setting of Springwell Village that the Plan policy intends to protect. "Rounding off" is not needed, and certainly not at the expense of valued greenbelt land. CSDP 2015-33 Publication Draft September 2019, p49 HGA1(iii) states " ensure that the open aspect of Bowes

Railway SAM is retained". This is impossible with development of HGA1.

- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

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Commercial Development Directorate Sunderland City Council Civic Centre	Name MRS. G. BURN	
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Dear Sirs		62133
CORE STRATEGY AND DEVELOPMENT PLAN	a	

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Core Strategy and Development Plan 2015-2033 Proposed Main Modifications Consultation Comment Form



Proposed Main Modifications Consultation Comment Form

Please use this form if you intend to make a representation in response to the consultation on the proposed Main Modifications to the Sunderland Core Strategy and Development Plan (CSDP).

If your comments relate to more than one Main Modification you will need to complete a separate form for each representation.

Following the submission of the Publication Draft CSDP for independent Examination to the Secretary of Statement in December 2018, a number of public hearing sessions were held between Tuesday 21 May 2019 and Thursday 13 June 2019. In response to issues raised during the hearing sessions, as well as representations made to the publication draft CSDP (Regulation 19) and taking into account the independent Planning Inspector's 'Post Hearing Advice – Main Modification and Related Matters' report (EX18.002) published in July 2019, the Council are undertaking a consultation on a number of proposed Main Modifications.

These modifications are set out in the Schedule of Main Modifications which is the focal point for this consultation. These are changes considered necessary by the Planning Inspector to make the plan sound. In support of the Main Modifications, a number of supplementary documents have also been published, including an Addendum to the Sustainability Appraisal.

The Schedule of Main Modifications, Sustainability Appraisal Addendum and supporting documentation are available to view at the examination webpage at www.sunderland.gov.uk/csdpeip

Copies of the Schedule of Main Modifications, Sustainability Appraisal and supporting documentation are also available to view at Sunderland Civic Centre, Burdon Road, Sunderland SR2 7DN during normal opening hours (8.30am to 5.15pm Monday to Thursday, and 8.30am to 4.45pm on Friday) and at all Council Libraries.

It should be noted that the Council has also prepared a Schedule of Additional Modifications. This sets changes which are minor in nature (such as typographical and factual errors and updates). These are not subject to consultation but are published for information only. The consultation only concerns proposed Main Modifications and the supporting Sustainability Appraisal Addendum and not other aspects of the plan.

The period for making representations runs for six weeks between Friday 13 September 2019 to Friday 4.45pm 25 October 2019. Representations received after this deadline will not be accepted.

Representations should only relate to the legal compliance and/or the soundness of the Proposed Main Modifications and made within the six-week period. Representations relating to other parts of the Plan will not be considered.

Please note that you should include all information, evidence and supporting information which is required to support your representation and any suggested changes.

All comments that relate to the Main Modifications and which are received within the consultation period (as set out above) will be considered by the appointed Planning Inspector as part of the Examination.

The Form of Schedule of Proposed Main Modifications

All policy numbers, paragraph numbers and figure numbers set out in the Schedule of Proposed Main Modifications relate to the Sunderland Core Strategy and Development Plan Consultation Publication Draft (SD.1).

This Consultation Representation Form provides the opportunity for you to either object or support the proposed Main Modifications to the Core Strategy and Development Plan. Representations should include the Main Modification Reference. This is set out in the first column of the Schedule of Main Modifications (this begins with a MM prefix). All representations should strictly focus on issues of either 'legal compliance' and 'soundness'. A summary of these terms is set out below.

The issue of 'soundness' is set out in the NPPF (2012) and is defined as being made up of the following:

- **Positively prepared** the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** the plan should be deliverable over its period and based on effective joint working on crossboundary strategy priorities; and
- **Consistent with National Policy** the plan should enable the delivery of sustainable development in accordance with the policies in the framework.

Legal compliance with regards to plan making generally refers to the Core Strategy and Development Plan meeting legal requirements under Section 20 (5) of the 2004 Planning and Compulsory Purchase Act (as amended by the Localism Act 2011) and the Town and Country Planning (Local Planning) (England) Regulations, 2012.

It is important that you fill in your contact details below. **We cannot register your representation without your personal details.**

Please note that all responses will be held by the Council in accordance with the General Data Protection Regulation 2018. Your name, organisation (if relevant) and comments may be made available to the public, in Council committee papers or as otherwise considered appropriate by us. Your personal data i.e. postal addresses, emails and telephone numbers **will not** be shared with the public.

However, your contact details will be shared with the Programme Officer for the purposes of the Public Examination. We will use your contact details to notify you about future stages of the plan process. By submitting this form you are agreeing to these purposes.

1. Your Details

	Your details	Agent details (if applicable)
Name		Lucie Jowett
Organisation/Group	Church Commissioners for England	Barton Willmore
Address Line 1		
Address Line 2		
Town/City		
County		
Post Code		
Telephone no:		
Email:		

2. Which Main Modification does your representation relate to?

Main Modification Reference	ММ
MM4	MM4/MM5/MM8 - East Springwell (HGA2)
MM5	and Rickleton (HGA6) retained as Green
MM8	Belt land
MM6	MM6 - Safeguarded Land
MM14	MM14 - Replacement Figure 34

3. Do you consider that the proposed Main Modification meets the legal and procedural requirements?



No No

4. Do you consider the proposed Main Modification addresses the following issues?

Positively Prepared	Yes X No
Justified	Yes X No
Effective	Yes X No
Consistent with National Policy	Yes X No

5. Please give details of why you consider the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which Main Modification you are referring to.

Please refer to attached letter.

6. Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness you have identified at Q5 above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

Please refer to attached letter.

7. If you wish to make any comment on the Sustainability Appraisal that accompanies the Schedule of Proposed Main Modifications or any other supporting documents, please make them here.

Please refer to attached letter.

8. Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name/organisation.

Signed: Lucie Jowett

Date: 25 Oct 2019

Completed forms should be returned to:

Email: planningpolicy@sunderland.gov.uk; or Post to: Strategic Plans Team, Civic Centre, Burdon Road, Sunderland SR2 7DN



BIRMINGHAM BRISTOL CAMBRIDGE CARDIFF EBBSFLEET EDINBURGH GLASGOW LEEDS LONDON MANCHESTER NEWCASTLE READING SOUTHAMPTON



Strategic Plans Team Sunderland City Council Sunderland Civic Centre Sunderland SR2 7DN

Sent by Email to: planningpolicy@sunderland.gov.uk

19013/A3/LJ

25th October 2019

Dear Sir/Madam

<u>SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN – MAIN MODIFICATIONS</u> <u>CONSULTATION</u>

These representations are submitted on behalf of the Church Commissioners for England (hereafter referred to as 'our Client') in response to the Sunderland Core Strategy and Development Plan - Main Modifications Consultation.

Our Client has significant land interests in the District and representations have been made to each stage of the Sunderland Core Strategy and Development Plan ('the Plan'), including appearance at the Examination Hearings in relation to their land interests at South Ryhope. Our Client's land interests at South Ryhope comprise of a proposed allocation and an adjoining site to the south which remains in the Green Belt.

Our Client has supported the proposed allocation of South Ryhope for residential-led development as part of the South Sunderland Growth Area (SSGA).

Representations have also been made to support the release of Green Belt land immediately south of our Client's draft allocation for further residential development. There is no physical delineation between the two sites. Ryhope Dene runs partly through the southern boundary of the site which remains within the Green Belt, with trees located alongside. This provides a physical and defensible boundary to the remainder of the Green Belt to the south. Extensive supporting work has been undertaken in support of the site's release including a Green Belt Assessment and Landscape Visual Appraisal.

Our Client's site included within the proposed allocation benefits from planning permission for up to 450 dwellings and a local centre. This site has been marketed and a preferred housebuilder selected. It is anticipated that a reserved matters application will be submitted in early 2020.

Immediately south of this site lies our Client's site which remains within the Green Belt. The release of this site for residential development would seamlessly integrate with the wider SSGA and, as such, will be accessible to a range of shops, services and facilities. With the inclusion of the southern site, the total South Ryhope allocation could deliver up to 615 dwellings.





Registered in England Number: 0C342692

Barton Willmore LLP Registered Office: The Blade Abbey Square Reading R61 3BE F/ +44 (0)118 943 0001 Our Client's representations to the proposed main modifications are set out within the remainder of this letter.

Proposed Main Modifications

Main Modifications 4, 5 and 8

The proposed housing growth areas of East Springwell (HGA2) and Rickleton (HGA6) are proposed to be removed and retained as Green Belt land following the Inspector's conclusion that they would have a significant effect on Green Belt purposes (MM4 and 5).

HGA2 proposed to deliver approximately 60 new homes and HGA6 proposed to deliver approximately 200 new homes.

Our Client does not object to these deletions, however, as discussed within the remainder of this letter, our Client does object to sites which accommodate 260 new homes simply being deleted and not being replaced by alternative sites.

The failure to identify additional land for release from the Green Belt would render the Plan unsound as it is not positively prepared on the basis that it will not meet the area's objectively assessed needs.

Main Modification 6

In addition to the deletion of the proposed housing sites above, the previously proposed safeguarded land to the south east of Springwell Village is also proposed to be deleted following the Inspector's conclusion that the site contributes to Green Belt purposes.

Our Client also does not object to this specific deletion, however, does object to no additional safeguarded land being identified in its place. The failure to identify additional safeguarded land would render the Plan unsound and would be contrary to the NPPF which requires that in reviewing Green Belt boundaries, Local Plans should have regard to their intended permanence in the long term so that they should be capable of enduring beyond the Plan period.

Our Client previously raised concerns within the Examination Hearings (both through written statements and verbally) that not enough land was proposed for safeguarding to meet longer-term development needs. The removal of the parcel to the south east of Springwell Village further exacerbates this.

Main Modification 14

Figure 34 has been replaced within MM14. Figure 34 sets out the housing supply breakdown, totalling 14,229 dwellings. This is only a 6% buffer on top of Sunderland's requirement of 13,410 net new homes over the Plan period.

Our Client has significant concerns that the Plan does not identified a sufficient supply of housing to meet the needs over the Plan period.

The housing land supply set out within Figure 34 includes a high reliance on commitments including sites which have no planning permission, not all of which will deliver over the Plan period. In addition to this, not all sites with planning permission are likely to deliver. This is further evidenced by the Council's past delivery rates.

Based on completions and the housing requirement in the North East RSS and proposed in the Sunderland Core Strategy and Development Plan, there has been a record of persistent underdelivery. Since 2009 the Council has failed to meet their housing requirement.

HERITAGE GRAPHIC COMMUNICATION PUBLIC ENGAGEMENT DEVELOPMENT ECONOMICS Within the Council's response dated 24 July 2019 to the Inspector's Post-Hearing Advice Note dated 22 July 2019, the Council considered that through the Allocations and Designations Plan, it would be able to identify a sufficient supply to ensure that a buffer of approximately 10% is retained without having to release any further sites. This claim is not supported by the figures presented within the main modifications at Figure 34 which shows that there is only a 6% buffer, and this is assuming that all sites will deliver.

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Additional clarification text is proposed under MM14 within paragraph 6.5. This clarifies that a 5% buffer has been applied to the housing requirement and should there be a record of persistent under delivery of housing, this buffer should be increased to 20%.

Our Client agrees that should there be a record of persistent under delivery of housing, the buffer should be 20%. This 20% buffer should however be applied now as the Council has failed to meet their housing requirement since 2009.

By not releasing further sites from the Green Belt now, the Council will not be able to identify a sufficient supply of sites. There is no evidence to demonstrate that additional sites within the Existing Urban Area (EUA) will become available to accommodate additional housing should sites in the supply not deliver and should the buffer need to be increased to 20% (if it is not increased now).

By assuming that additional sites in the EUA will become available undermines the Exceptional Circumstances case to justify Green Belt release. In justifying Green Belt release the Council has assessed all available and viable brownfield land and residential densities have been maximised. There is no evidence to demonstrate that existing sites could accommodate accelerated constriction or that additional sites within the EUA will become available.

If the Council do persist in not releasing further Green Belt, then the currently proposed safeguarded land may well need to be released early to help meet identified need. Additional safeguarded land would therefore be required to ensure that longer-term development needs are met well beyond the Plan period in accordance with the NPPF.

<u>Summary</u>

Our Client has significant concerns that the Council has failed to identify sufficient land to meet its housing requirement. Our Client does not object to the deletion of previously proposed Green Belt release, however, does object to there being no replacement sites for removal from the Green Belt.

We have previously submitted representations to demonstrate that our Client's site is suitable and available for development in the short to medium term. Should the Council not release any further land from the Green Belt then our Client's site would be appropriate as safeguarded land to meet future development needs.

Yours sincerely

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LUCIE JOWETT Senior Planner

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Sunderland City Council - Core Strategy and Development Plan - Main Modifications Consultation



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Thank you for your notification received on the 13 September 2019 in respect of the above consultation.

I can confirm that the Coal Authority have no specific comments to make on the Main Modifications proposed.

Kind regards

Melanie Lindsley BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI Development Team Leader (Planning)

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nior Planning Officer Inning Strategy mmercial Development Directorate Inderland City Council ric Centre Inderland 2 7DN October 2019	I agree to my data being used by Sunderland Council and the Planni Cooper, E. 1132950, MMC148 Develo Name. MRS, E. COOPER Addre
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Senior Planning Officer Planning Strategy Commercial Development Directorate Sunderland City Council Civic Centre Sunderland SR2 7DN 2 5 NCT 2019 15 October 2019	I agree Cowie,F,953063,MMC145 and the Plannin Development man process. Name. Frances Cowie
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Dear Sirs

CORE STRATEGY AND DEVELOPMENT PLAN

I welcome the recommendations made by Inspector that sites HGA 2 and Safeguarded Land South of East Springwell and the area around Peareth Farm and Gospel Hall remain within the greenbelt. And welcome Council's modifications to the CSDP reflecting these recommendations. However there are a number of comments I would like to make in relation to site HGA 1 (South west Springwell Village, north of Mount Lane):

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CORE STRATEGY AND	DEVELOPMENT PLAN		

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- d. Northumbrian Water Limited's planning application (ref: 19/01280/FU4) for a reservoir on land immediately north of Mount Lane and south of site HGA1 details a huge development that will impact severely on the wildlife, ecology, environment and amenity of the whole area. Allowing housing development on HGA1 will only make this worse.
- e. Springwell Village is already suffering from very high levels of traffic on narrow, old roads that cannot be widened. The impact of the reservoir on the openness of the Mount Lane area coupled with more houses can only make this worse.

Comment

Agent	Miss Nicola Allan (1176909)
Email Address	
Address	
Consultee	Mr James Ebdale (1136253)
Email Address	
Address	
Event Name	Core Strategy and Development Plan - Main Modifications
Comment by	Mr James Ebdale (1136253)
Comment ID	MMC19
Response Date	24/10/19 16:48
Status	Submitted
Submission Type	Web
Version	0.1
Which Main Modification does your representation relate to?	MM3,4,6,7 & 8
Do you consider that the proposed Main Modification meets the legal and procedural requirements?	Yes
Do you consider the proposed Main Modification addre	esses the following issues?
Justified	Yes
Effective	Yes
Consistent with National Policy	Yes

Please give details of why the proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the proposed Main Modification, you can also use this box. Please set out which modification you are referring to.

MM3 - Poliy SP1 - I support the allocation of the South Sunderland Growth Area and The Vaux. These sites will positivley contribute to the supply of housing land in the plan period. MM4 - Policy SP3 - I strongly support the allocation of safeguarded land at Washington as this will mean the gren belt bounaries will endure in the long term and should not be changed in the plan period. MM6 - Policy SS3 - I support the allocation of safeguarded land for the reasons set out above MM7 - Policy SP4 - I support the deletion of the Growth Area for North Sunderland at North Hylton. This land meets the purposes of green belt designation and should always be kept open. MM8 - Policy HGA7 - I strongly support the deletion of this Growth Area. The site at North Hylton is important green belt land and should stay as such. It is part of the vital green infrastructure running along the river Wear and out into the open countryside. It is also unsustainable as a housing site being remote from services and facilities and would increade reliance on the private car for all journeys. AM28 - Policy SS1 - I strongly support the allocation of The Vaux site for mixed development including housing.

Please set out what change(s) you consider are necessary to make the proposed Main Modification legally compliant or sound, having regard to the test of soundness identified above. Where this relates to soundness, it will be helpful if you are able to put forward suggested revised wording and provide your reasoning. Please be as precise as possible.

none

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RE STRATEGY AND DEVELOPMENT PLAN

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