

Customer Details			Spatial Approaches				Strategic Sites			Other Comments	Officer Response		
Name of Respondent	Cust Ref	Company/Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?		
Geoffrey Britton	01288	Akenside Developments	4	2	1	3	There are plenty existing brownfield sites to focus on in the current urban areas without the need to spread into greenbelt.		Yes		The area between the Alexandra bridge and the Stadium of Light on the north bank poor quality area currently, and could be a significant addition to the city.		If approach A is chosen greenbelt land will be required in Washington due to the restrictions which would be in place on the Coalfield and just not enough brownfield sites throughout the city to take up this. Approach B also proposes greenbelt use, this is due to each area having a proportional distribution of development, and the lack of brownfield sites within Washington. There is no need to bring the area between the Queen Alexandra Bridge and the Stadium forward for development as there are sufficient sites elsewhere in Central Sunderland. There is no need to identify as Strategic Site. It will be maintained as open space.
Mrs E M Homes	00884												Forwarded to the Transportation section of City Services
Gavin Elliot	01399		3	4	2	1	Approach D gives us the greater benefits with the lowest negative impact and retains green space		Yes		Public Sector sites which should be offered up as supported housing sites for vulnerable people.		Comments noted
Peter Razaq	01331	Kans & Kandy Ltd	1	4	2	3	Fully support strategic employment site north of Nissan. It is market ready, with access existing directly onto the A19. A19 corridor is vital to the future success of Sunderland and should be exploited.		Yes				Comments noted
D Ridley	08874		2	4	1	3	Retain open countryside and green belt in Coalfield districts.	Restrict all development in Coalfield district to existing brownfield sites.		Not convinced of need for new primary road through the Hetton district.	Reinstatement of old railways for light rail to improve public transport, EG Sunderland-Durham Line		Comments noted. Points are being taken forward through the Core Strategy
Ronald McQuillan	01348						These approaches are predetermined serving their own vested interests. For public approval?	German companies delivering our parcels the appointment of German bridge builders for absurdly designed iconic, impractical wear bridge, Transporting steel mesh cages all the way from Germany, Does nothing to make Sunderland prosperous.	No	The land at Doxford and the Grove Crane site should be reserved for manufacturing, marine and port regeneration - The planned site would not serve the travelling public; It would increase congestion and air pollution.	1) A bridge for road for vehicular in place of a footbridge. 2) A Bridge to replace the Gill Foot Bridge with a road. 3) A road bridge from Colima Avenue to the metro underpass. This Plan would solve transport problems. The City's plans are rubbish.	Comments given in 'any other suggested approach' although a response, is not a planning issue, therefore no action needs to be taken.	Comments noted. The new bridge has been allocated through Alteration no.2, with the planning application now submitted for consideration
Marion McGuinness	01420		4	1					No	It would be useful to have a strategic site within the Coalfield area. Although I take the part about the use of Greenfield areas. I do not totally disagree with the other sites.			Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.
Mrs M Ashcroft	00899		3	4	2	1	Important to protect green space where possible have concerns about "high density" housing - social problems		Yes	Support stadium village site but will need very careful planning with regard to type of "large scale leisure uses" particularly when mixed with housing.	Yes - Roker retail park, car parks, roads in situation, this space needs to be used.		Comments noted
Ronald McQuillan	01348						No preference for any	Yes - A bit of joined up thinking RE - Strategic sites 2, 3, 4, 5, 7 and 9.		We need the opportunity to make duly made objections.	A public inquiry in conformity with town of country planning legislation is needed.		A statutory part of the Local Development Process is to hold a public examination based on duly made representations that test the soundness of the Core Strategy.
Louise Oakley	01341	Uk Coal Plc	4	1	3	2					Potential Strategic Site on land adjacent to Rainton Bridge Industrial Estate, Sunderland. Employment use	Core Strategy Alternative Approaches - The above site is submitted in respect of the Council's Core Strategy - The site is located immediately to the west of Rainton Bridge Industrial Estate and extends westwards to the , currently mothballed, Leamside Railway. The Rainton Meadows local Nature Reserve lies to the south of the site and the north, but separated by an area of agricultural land, lies the village of Chilton Moor. The site occupies an area of approximately 15 hectares and is currently vacant. The site is located in the 'Coalfield area' which essentially comprises the Houghton-Le-Spring and Hetton-Le-Hole areas.  The site provides an ideal opportunity to satisfy the need for additional new employment site in the Coalfield area, as identified for Core Strategy Approach B (Proportional Distribution of Development) and Core Strategy Approach D (Sub-Area Spatial Requirements). Core Strategy Approach B makes provision for 20 hectares of new employment land. Core Strategy Approach D makes provision for 14 hectares of new employment land. The proposed site is 15 hectares in size. The site is located near to the Sunderland/County Durham boundary and has excellent transport connections. Therefore, the site would clearly serve a wide area. The road access is adjacent to the existing main distributor road in the south section of Rainton Bridge Industrial Estate. This road links to the A690 to the east providing a high-quality link to the A19 to the north east and the A1M to the south west. The site is also immediately adjacent to the currently mothballed Leamside railway line, which is proposed to be re-opened for both passenger and freight railhead facilities for the Rainton Bridge Industrial Estate and wider area but also the potential for a rail passenger station to serve the industrial estate and wider area. The provision of a railhead at the site would be a relatively simple operation given it's proximity to the Leamside Line and that the line will be re-laid and re-engineered before being brought back into use, offering an ideal opportunity to provide a new railhead. The Council's Core Strategy - Alternative Approaches document identifies that most of the proposed Strategic Sites will take many years to become fully developed, with some of the sites being completed towards the end of the plan period in 2026. The reasons for this delay include landownership issues, contamination problems or the current lack of services water, power, sewerage) to the sites. The proposed site has an advantage over the identified Strategic Sites in that it would be available for development immediately. The land is also entirely owned by UK Coal plc.  There are no known contamination problems at the site and the site would easily link to existing services, i.e. water, power and sewerage at Rainton Bridge Industrial Estate. There are no other foreseeable constraints to developing this site for employment uses in the short term. We are, therefore, of the view that the development of the site within a five year period is realistic and achievable. The inclusion of this site as a Strategic Site will provide the opportunity to meet additional new employment land allocations in the Coalfield area as identified by Core Strategy Approach B and Core Strategy Approach D. The proposed site has the following attributes; - it is immediately adjacent to one of the most successful new employment sites, not only in Sunderland, but in the North East Region; - it has existing good road links to the surrounding area and strategic road network (A19 and A1M); - it is readily accessible by public transport; - it provides the opportunity for freight railhead connection for the whole of Rainton Bridge Industrial Estate and a passenger rail station when the currently mothballed Leamside railway line is brought back into use; - it is readily assimilated into the local landscape by a continuation of the established structural planting framework on the existing industrial estate; and - it is compliant with national, regional and emerging local planning policies. It is, therefore, considered that the site should be identified as a Strategic Site for employment use in the Core Strategy.	Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area
Emma Williams	00786	National Offender Management Service									PPS12 'Local Development Frameworks' notes that the core strategy development plan document should set out broad locations for delivering the housing and other strategic development needs such as essential public services. Paragraph 4.1 encourages early involvement of government agencies in the preparation of LDFs while paragraph B3 requires local planning authorities to develop a strategic approach to infrastructure provision (including community facilities) when preparing local development documents.  Circular 3/98 'Planning for Future Prison Development' highlights the continuing overcrowding within the prison estate and the need to replace outdated and inadequate facilities. Specifically there is a need to identify more sites for new prisons. The Secretary of State expects that local planning authorities will work together with the Prison Service to identify land for new prisons through the development plan process. The Circular advises that in order to enable authorities to make provision for prisons within their development plans the Prison Service will consult with authorities about likely areas of future need (paragraph 7).  Circular 3/98 recognises at Paragraph 2 that there should be guidance in development plans on community facilities and infrastructure requirements and also that they should take account of the need for new prison developments, which should be identified through the planning system. The Circular notes that in identifying potential prison sites, the Prison Service has to take account of local and regional requirements for additional prison places, the court catchments areas served and the relationship of the site to nearby population centres. It goes on to specify a number of other site development considerations and also recognises that the objectives of sustainable development and in particular the need to reduce unnecessary travel should apply to site selection. Prisons should not be located too far from the centres of population they serve and there should be reasonably good accessibility to public transport services. The Circular also recognises that new prisons have potential for a substantial and beneficial impact on the economy of a local area. New jobs are created on site (both during construction and permanent jobs), goods and services are purchased in the community and extra local income is generated as a result of the disposable income of prison staff. In recent years there has been a significant increase in the prison population. In the 1970's the prison population in England and Wales was in the order of 40,000; in July 2005 that figure had risen to 76,538. The prison estate is experiencing serious overcrowding. NOMS is doing everything it can to maximise capacity at existing prisons by bringing buildings back into use through refurbishment, new house blocks, temporary units and 'ready to use' units. However, many prisons are already operating at capacity and there is limited potential to significantly increase the number of places at existing prisons. The prison system is therefore heavily dependent on new prisons to provide the additional places.  While there are no specific proposals for new prison development in your district at present nor specific sites identified, in line with Government guidance NOMS requests that you consider the inclusion of a criteria based policy to deal with a firm prison proposal should it arise during the plan period. I would be pleased to propose a detailed policy for inclusion in your Development Plan Document and would welcome your views on how this proposal should be taken forward.	Given that the LDF system has moved away from a 'planning for every eventuality approach' to one of planning for 'delivery' based robust evidence of the need for a policy, currently no need demonstrated for prison in Sunderland and there are no specific proposals for new prison developments in Sunderland as such the LDF has no requirement to include a policy for new prisons.	
Mark Welsh	00393	Seaham Town Council									Express support for your intention to develop and improve facilities for the population and enhance and protect the environment. Sunderland and Seaham are close neighbours with very different identities and as you will be aware, given the extensive media coverage, Seaham is in the early stages of		The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development.

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												implementing it's Destination Development Plan in order to become a vibrant tourist destination. Implicit in this is the maintenance of the Town's identity as a lively harbour town on the Durham Heritage Coast. We would like to express in the strongest terms, the wish to maintain the greenbelt area between the city of Sunderland and the town of Seaham. The Town Council are strongly opposed to the development of the site south of Ryhope which would result in a further reduction in the current Green Belt corridor.	Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham.
Susie Blyth	01395				1				Yes				No response required
Pat Mulvaney	01393		1	4	2	3	I hope you know what you are doing!						No response required
Mrs A George	01394		3	4	2	1	No development in Green Belt		Yes	Definitely need something on Vaux			Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites.
Bobby Thomas	01391		2	3	4	1	Do not like apartments		No	2 - GROVES at Pallion, big mistake, bad reputation no one will move there, no one will buy. 1 NORTH OF NISSAN - Protect Green Belt (don't develop).			Comments have been noted. The Groves site is allocated for a residential led development in Alteration No.2 but this would include elements of employment accommodation and its status will be enhanced by the proposed landmark bridge. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production.
E Wilson	01392		3	4	1	2	Protect local businesses, centres and services.	Safer streets for pedestrians					No response required
L Mountford	01390		4	3	2	1	Build quality housing						Comments noted
Terence Manning	01387		3	4	1	2			No	1 - (North of Nissan) too far out, a lot of travelling for rest of city, congested roads, poor Public Transport. 2 - Vaux - retail only			Comments noted
Fred Burton	01388		3	4	2	1			Yes				No response required
P Mountford	01389		4	2	3	1	Don't build tower blocks						Comments noted
Brian Teggert	01373				1		Revitalise Houghton Town Centre			Concerned that nothing proposed for the Coalfield area			Comments on revitalising Houghton Town Centre have been noted and is to be highlighted in the Core Strategy. Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.
Mrs Harie	01374				1								No response required
Gary Taylor	01375				1								No response required
Mrs Mossrop	01376				1								No response required
Mary Lisle	01378				1								No response required
J Cuckson	01379				1				Yes	8. South Ryhope - no Greenfield sites should be used			The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham. Acknowledged in Employment Land Review that site is long-standing allocation. However ELR recommends retention of the site for B2 & B8 uses.
Linda Ede	01380			1									No response required
Lesley Williams	01381			1			Need more facilities In Houghton Town Centre - Public Toilets						Comments noted. The need for the regeneration of Houghton has been identified and will be taken forward through the Core Strategy.
Donald Glynn	01383			1									No response required
Robin Midson	01384				1		Maudlin Street - Need investment in unadopted roads, home improvement grants would help - improving existing housing imperative to revitalising areas as a whole.		Yes	Should be more in Coalfield area instead of focus on central area only			Comments noted and forwarded to engineering development. Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.
Kenneth Walton	01385				1		Lack of 2 bedroom bungalows, Gentoo too slow at building.		No	More in Coalfield area			Bungalows are a required housing type throughout the city, as highlighted in the SHMA, and this issue will be picked up on in the relevant Core Strategy Policy. Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area
Alan Patrick	01386		1										No response required
John Colclough	01372				1				Yes	Particularly Nissan - Agree Groves is important			No response required
Jill McKnight	01369				1				Yes				No response required
Susan Uve	01370				1				Yes				No response required
June Patterson	01371				1				No	Agree with 1,2,3,5,6,7,8,9,10			No response required
Mawson			4	1	3	2	A and B - because more housing and employment in coalfields - Coalfield needs new development both housing and employment but needs more public transport - access is very poor.	Need to improve transport facilities and access to & from Shiney row. Need to re-open Leamside railway line - would open up and support Shiney row/ Fencehouses ect.					Comments noted
Gemma Younghusband	01364				1		But no employment site in coalfields make north Nissan site bigger		Yes				Comments noted
D Johnson	01363				1		Don't develop on our countryside / farmers fields / Green belt. Once its gone its gone! But don't like proposed employment site	Do we need all these new houses? Who can afford them?	No	Nissan (north of) & South Sunderland, Not on Greenfield			Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites.
A Bainbridge	01362		4	2	3	1			Yes				No response required
Natasha Campbell	01361		4	1	3	2	B has most employment and housing in Coalfield area		Yes				No response required
Emma Beston	01360		2	1	4	3	Need housing in Washington desperately 6% on the other options isn't enough		Yes				Presently, there are limited suitable development opportunities within the urban area of Washington without recourse to developing sites within the Green Belt.
Kathryn Holyoak	01359		4	2	3	1	Public transport, poor accessibility, improved footpaths access. Housing growth / services and facilities		Yes				Comments noted
John Heppell	01365		1	2	3	4	Protection Green Belt Land & Increasing Employment		Yes	4 ( Stadium Village) and 8 (South Ryhope) I don't agree because it's green belt land which should be used for recreation			Comments noted. Stadium village is allocated for leisure led mixed use development in alteration no.2. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham.
Paul Sawicki	01357			1			No, but would like to see more houses in Seaburn / Marsden area of North Sunderland						Comments noted
Mr Luther	01358						More within South Sunderland. No countryside. Enough Housing in South. Happy with more employment.						Comments noted
Elaine Davidson	01351							Leisure pools, more tourist attractions, social vs private housing, ice rink, Leamside Line - No identity? - Heritage? Leisure / Culture for all ages. Why no parking at the swimming pool?					Comments noted and forwarded to the Community Services section of City Services.
David McEvey	01352			1			Play facilities for Children						Comments noted and forwarded to the Community Services section of City Services.

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Carly Clapp	01353		1	2				More retail, services and facilities in Concord. Primark, clothing / electrical / (Peel Retail) These kind of shops should be close to Concord. Customers wanting lower prices.	Yes				The importance of Concord as a major district centre is to be recognised within the Core Strategy alongside the need to protect and enhance its viability
Muriel Piemper	01354		1	2				Things for older kids, ice rink?, Crowtree pool (keep open), footbridge at stadium village	Yes				Comments noted. Issued raised are detailed issues not relevant to the Core Strategy but they have been forwarded to City Services for information and action where appropriate.
Gillian Robertson	01355		1	2				Washington Princess Park, more for kids.	Yes				Comments noted and forwarded to the Community Services section of City Services.
Carol Rennison	01356		1	2			More housing e.g. flat houses, employment construction work, retail shops in Concord.		Yes				Comments noted
Mr & Mrs Tennant	01396		3	4	1	2	Regenerate City Centre, don't pull old buildings down.						Comments noted
Brian Wilkinson	01397		3	2	4	1	Greenfield incursions are inevitable. Vaux and Port need imaginative approach.		Yes				Comments noted
Raymond Luke	01398		3	4	2	1	Building down on wear along new bridge area.						Comments noted
Elaine Naylor	01413					1			Yes				No response required
Andrew Brown	01415		3	2	4	1		Hetton Downs needs investment	Yes	Central Route will benefit A182			Hetton Downs Area Action Plan is being delivered as part of the Local Development Framework.
Helen Oliver	01416		3	2	4	1		Conserve Hetton Lyons Park & Protect Eppleton School	Yes	Extend central route			Comments noted
Carol Bell	01414		4	3	2	1	Protect Eppleton School, Green Belt area allotments - opposed to pulling down some housing which could be renovated - is that practice environment friendly. Would prefer not extend quarry option.						Comments noted
David Ridley	08874		4	3	1	2	Main concern is protecting the greenbelt and open countryside from development.		No				Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites
G Ridley	01418		4	3	2	1	Open countryside and greenbelt protection						Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites
Ian McKinnell	01417		3	4	2	1			Yes				No response required
Jonathan Kilner	01402	Youth Parliament	3	4	2	1	The preservation of the green belt is vital for Sunderland		Yes				Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites
Coner Fenwick	01407	Youth Parliament	4	2	1	3	I believe we should focus on employment in Pallion, the area beside the Metro Station		Yes				Comments noted
Misba Ul Islam	01406	Youth Parliament	2	4	3	1	The regeneration of Vaux is very important. Also run down areas by the riverside need improvements.		Yes				Comments noted
Jack Mason	01405	Youth Parliament	2	4	3	1	Vaux site should be a priority for both employment and housing.		Yes				Comments noted
Naomi Robson	01404	Youth Parliament	3	4	2	1			Yes				No response required
Sarah Gordon	01403	Youth Parliament	4	1	3	2			Yes				No response required
Mark Harrison	00981	The Coal Authority											Comments noted
													<p>The Current Energy White Paper, published in May 2007, estimated that "by 2020 fossil fuels are expected to supply the great majority of UK energy needs and 14% of primary energy demand will be met by coal." In March 2008, the Rt Hon. John Hutton MP, Secretary of State for Business Enterprise and Regulatory Reform stated that "...Fossil fuels will continue to play an important role in ensuring that flexibility of the electricity generation system as well. Electricity demand fluctuates continually, but the fluctuations can be very pronounced during winter, requiring rapid short term increases in production. Neither wind nor nuclear can fulfil that role. We therefore will continue to need this back up from fossil fuels, with coal a key source of that flexibility. ..."</p> <p>that by 2020, clean coal will contribute 22% to the overall energy mix (this is actually an increase on that predicted in 2007 Energy White Paper). The 2009 White Paper re-confirms that "coal and gas will remain important to ensure our electricity supply is reliable and secure as we move towards greater dependence on intermittent sources like wind...The UK needs to main security of supplies of fossil fuels, which will remain an essential input to our electricity supplies for many years to come. Around a third of this is supplied by the UK coal industry." The Coal Authority is keen to ensure that coal resources are not unduly sterilised by new development. In instances where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. As The Coal Authority owns the coal on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required. Representation No.1 Site/Policy/Paragraph/Proposal – Alternative Approaches Test of Soundness Justified Effective Consistency With National Policy Comment - As you will be aware, there are surface coal resources present across roughly the western half of Sunderland. Although this particular Core Strategy consultation is only focussing on alternative spatial approaches and strategic development sites, we assume that the Core Strategy will ultimately identify Mineral Safeguarding Areas, including coal. The Coal MSA will be predominantly focused on the Washington and Coalfield sub-areas, and we would expect the Core Strategy to require that consideration is given to extraction of the coal resource prior to non-mineral development taking place in the MSA in line with MPS1. Although The Coal Authority has no preference to make regarding the four Strategic Approaches proposed; Approach B and Approach D would result in the most development in the Washington and Coalfield sub-areas, and therefore create to greatest need for definition of a coal MSA, accompanied by an appropriate prior extraction policy in the Core Strategy. Reason – In order to comply with the requirements of MPS1 regarding the safeguarding of mineral resources and, if necessary, prior extraction of those resources in MSAs to avoid sterilisation by non-mineral development. Representation No.2 Site/Policy/Paragraph/Proposal – Strategic Sites Test of Soundness Justified Effective Consistency With National Policy X</p> <p>by surface mining methods: 1. North of Nissan 2. Groves The Coal Authority considers that, as strategic scale development identified in the Core Strategy reference should be made in any subsequent policy to the need for developers to give due consideration to extraction of surface coal resources prior to development taking place. This not only prevents sterilisation of the mineral resource, but can also remove any potential land instability problems in the process. This is a locally distinctive issue that should be addressed in the Core Strategy and is supported by requirements for safeguarding of mineral resources and prior extraction in MPS1. Reason – In order to comply with the requirements of MPS1 regarding the safeguarding of mineral resources and, if necessary, prior extraction of those resources in MSAs to avoid sterilisation non-mineral development. Coal Mining Legacy</p> <p>As you will be aware, the Sunderland area has been subjected to coal mining which will have left legacy. Whilst most past mining is generally benign in nature potential public safety and stability problems can be triggered and uncovered by development activities. Problems can include collapses of mine or emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area where coal exists near to the surface, including existing residential areas. The new Planning Department at the Coal Authority was created in 2008 to lead the work on defining areas where these legacy issues may occur.</p> <p>The Coal Authority has records of over 171,000 coal mine entries across the coalfields, although there are thought to be many more unrecorded. Shallow coal which is present near the surface can give rise to stability, gas and potential spontaneous combustion problems. It is estimated that as many as 2 million properties of the 7.7 million properties across the coalfields may lie in areas with the potential to be affected by these problems. In our view, the planning processes in coalfield areas needs to take account of the coal mining legacy issues. The principal source of guidance is PPG14, which despite its age still contains the science and best practice on how to safely treat unstable ground. Within the Sunderland area there are approximately 290 recorded mine entries and 1 coal mining related hazard. Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy are public safety hazards. Although mining legacy is as a result of mineral workings it is important that new development delivered through the Local Development Framework, recognises the problems and how they can be positively addressed. Land instability and mining legacy is not a complete constraint on the new development, rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of the Coal Authority may be required. Representation No.3 Site/Policy/Paragraph/Proposal – Paragraph 3.5</p> <p>Test of Soundness Justified Effective Consistency With National Policy X</p> <p>Comment – In identifying the key spatial objectives and issues that impact on distribution of development through the Core Strategy The Coal Authority considers that mining legacy is an important locally distinctive issue to Sunderland that should be added to the list in paragraph 3.5. PPG14 highlights the importance of land stability and we consider that it should be a factor that influences the distribution of development, although we do not consider that the following issue should be added to the issues and objectives:</p> <p>"Coal Mining Legacy – consideration of issues arising from past coal mining activity across the city."</p> <p>Reason – In order to address the requirements of PPG14 regarding land instability. Representation No.4 Site/Policy/Paragraph/Proposal – Strategic Sites Test of Soundness Justified Effective Consistency With National Policy X</p> <p>Comment – Of the eight proposed strategic development sites only one, Stadium Village, appears to be affected by recorded coal mining legacy. The site has a significant coal mining legacy as a result of being the former site of Wearmouth Colliery, which was closed in 1993. The site has been subject to remedial works, by or on behalf of The Coal Authority, associated with a mine gas investigation and there are a number of mine entries within the site. The Coal Authority submitted detailed comments on this site</p>

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													dated 17 February 2009 to the Stadium Village Development Framework SPD highlighting the issues, and would expect any policy seeking to allocate the site in the Core Strategy to require developers to fully consider and, where necessary mitigate, the coal mining legacy on this site. Reason – In order to address the requirements of PPG14 regarding land instability.	
Les Morris	00278	National Grid											<p>Overview – National Grid</p> <p>National Grid is a leading international energy infrastructure business. In the UK National Grid's business includes electricity and gas transmission networks and gas distribution networks as described below.</p> <p>Electricity Transmission</p> <p>National Grid, as the holder of a licence to transmit electricity under the Electricity Act 1989, has a statutory duty to develop and maintain an efficient, co-ordinated and economical transmission system of electricity and to facilitate competition in the supply and generation of electricity.</p> <p>National Grid operates the national electricity transmission network across Great Britain and owns and maintains the network in England and Wales, providing electricity supplies from generating stations to local distribution companies. We do not distribute electricity to individual premises ourselves, but our role in the wholesale market is key to ensuring a reliable and quality supply to all. National Grid's high voltage electricity system, which operates at 400,000 and 275,000 volts, is made up of approximately 22,000 pylons with an overhead line route length of 4,500 miles, 420 miles of underground cable and 337 substations. Separate regional companies own and operate the electricity distribution networks that comprise overhead lines and cables at 132,000 volts and below. It is the role of these local distribution companies to distribute electricity to homes and businesses.</p> <p>To facilitate competition in the supply and generation of electricity, National Grid must offer a connection to any proposed generator, major industry or distribution network operator who wishes to generate electricity or requires a high voltage electricity supply. Often proposals for new electricity projects involve transmission reinforcements remote from the generating site, such as new overhead lines or new development at substations. If there are significant demand increases across a local distribution electricity network area then the local network distribution operator may seek reinforcements at an existing substation or a new grid supply point. In addition National Grid may undertake development works at its existing substations to meet changing National Grid owns and operates the high pressure gas transmission system in England, Scotland and Wales that consists of approximately 4,300 miles of pipelines and 26 compressor stations connecting to 8 distribution networks. National Grid has a duty to develop and maintain an efficient co-ordinated and economical transmission system for the conveyance of gas and respond to requests for new gas supplies in certain circumstances.</p> <p>New gas transmission infrastructure developments (pipelines and associated installations) are periodically required to meet increases in demand and changes in patterns of supply. Developments to our network are as a result of specific connection requests e.g. power stations, and requests for additional capacity on our network from gas shippers. Generally network developments to provide supplies to the local gas distribution network are as a result of overall demand growth in a region rather than site specific developments.</p> <p>Gas Distribution</p> <p>National Grid also owns and operates approximately 82,000 miles of lower-pressure distribution gas mains in the north west of England, the west Midlands, east of England and north London – almost half of Britain's gas distribution network, delivering gas to around 11 million homes, offices and factories. National Grid does not supply gas, but provides the networks through which it flows. Reinforcements and developments of our local distribution network generally are as a result of overall demand growth in a region rather than site specific developments. A competitive market operates for the connection of new developments.</p> <p>National Grid and Local Development Plan Documents</p> <p>The Energy White Paper makes clear that UK energy systems will undergo a significant change over the next 20 years. To meet the goals of the white paper it will be necessary to revise and update much of the UK's energy infrastructure during this period. There will be a requirement for:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> An expansion of national infrastructure (e.g. overhead power lines, underground cables, extending substations, new gas pipelines and associated</li> </ul> <p>Our gas and electricity infrastructure is sited across the country and many stakeholders and communities have an interest in our activities. We believe our long-term success is based on having a constructive and sustainable relationship with our stakeholders. Our transmission pipelines and overhead lines were originally routed in consultation with local planning authorities and designed to avoid major development areas but since installation much development may have taken place near our routes.</p> <p>We therefore wish to be involved in the preparation, alteration and review of Development Plan Documents (DPDs) which may affect our assets including policies and plans relating to the following issues:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Any policies relating to overhead transmission lines, underground cables or gas pipeline installations</li> <li><input type="checkbox"/> Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines</li> <li><input type="checkbox"/> Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations</li> <li><input type="checkbox"/> Any policies relating to the diverting or under grounding of overhead transmission lines</li> <li><input type="checkbox"/> Other policies relating to infrastructure or utility provision</li> <li><input type="checkbox"/> Policies relating to development in the countryside</li> <li><input type="checkbox"/> Landscape policies</li> <li><input type="checkbox"/> Waste and mineral plans</li> </ul>	Comments noted
Aaron Smith	01423	Comments on behalf of Punch Taverns	3	2	4	1							<p>Spatial Approaches</p> <p>The score for each approach we recommend is as follows:  Approach A = 3  Approach B = 2  Approach C = 4  Approach D = 1</p> <p>The approaches are ordered for the following reasons:  Approach A – Focusing development upon the conurbation  Whilst this approach reflects North East RSS Policy 6 it would have a significant adverse impact on the Coalfield Area and will lead to development incursions into the open countryside, the protected Green Belt and in the least sustainable locations elsewhere in the city.</p> <p>RSS Policy 6 should not be used as a carte blanche to prescribe unrealistic amount of new housing and employment development on the conurbation without reference to land supply and constraints, also see objections to Approach B below. Clearly the RSS anticipates the majority of development will be concentrated in the conurbations and main settlements, however locally this must be properly understood and interpreted, with reference to the RSS plan as whole and taking into account other local factors. Given the availability of other suitable and sustainable previously developed and greenfield land in more sustainable locations, with less planning, physical and environmental constraints elsewhere in Sunderland such as within the Coalfield, there is no justification for development anticipated in figure 3 that would result in the loss of the Green Belt and in unsustainable locations such as Washington and North Sunderland.</p> <p>Sunderland's existing communities should be supported, not forgotten, developed to meet local requirements and taking advantage of opportunities that already exist. Local facilities will be harmed through a decline in the population in part of the city where limited development is proposed.</p> <p>Approach B – Proportional distribution of development  Planned development is too intense in Washington and North Sunderland as part of the proportional approach. Whilst North Sunderland proportionally houses 20% of the population it is very densely populated, Washington also houses 20% in a restricted area. Land is scarce in Washington and North Sunderland where the SHLAA identifies 6% and 12% available land respectively, therefore intensification of 15% additional housing each will result in incursions into the Green Belt and development in unsustainable locations. Whereas Approach B emphasises development in the City Centre and Central Sunderland, clearly these areas could benefit from a redistribution of some of proposed development in the least sustainable and suitable locations, i.e. taking from Washington and North Sunderland.</p> <p>As land is clearly available for development in the Coalfield (23%), Approach B makes good use of the land resource, taking significant pressure away from the Green Belt incursions in South Sunderland, but perhaps not enough.</p> <p>Approach C – Focus development within the current urban area  Whilst the North East RSS Policy 4 and PPS3 advocates a sequential approach to directing new development, i.e. priority is given to previously developed land and buildings in the most sustainable locations, these policies do not preclude development in other suitable and sustainable locations, particularly when they perform better than previously developed land. Approach C precludes development in all non previously developed land and building locations, placing too much emphasis and pressure on the current urban area. Clearly this is against the objectives of the RSS and PPS3 as these recommend a suitability and sustainability approach should be taken to identifying development locations, not precluding. This is shown by the 75% brownfield land target by 2016, not 100%. This approach risks a heavy reliance on brownfield land which is not truly deliverable, particularly important in it where high density flat developments were often the only way to viably deliver large contaminated brownfield sites without public intervention. The spatial approach fails to meet strategic housing requirements and places an undue intensification requirement on both employment and housing densities required to meet the shortfall. In terms of housing, further increasing the density of development will result in greater flatted developments in locations where people do not wish to live. The Sunderland Housing Needs Report identifies people do not prefer or need high density flatted developments likely to be developed through this approach. PPS3 paragraph 20 advocates providing a mix of housing, with an emphasis on family housing, also reiterating the needs of older people are taken into account in this aging society. Higher densities are not going to be feasible on existing brownfield urban sites given the housing types needed. The identified local demand is for detached and semi-detached 3 and 4+ bedroom family housing which need to be provided in all areas of the city to stem outward migration. Also 2 and 3 bedroom semi-detached housing are also required.</p> <p>Garden sizes are already shrinking beyond usable spaces and other sustainable construction plus life time home standards are not compatible with very high density developments anticipated by Approach C. In terms of employment, there is a risk that pressure will be placed on much needed employment land throughout the city to be re-allocated as housing to deliver the housing targets. Paragraph 9.6 of the Housing Topic Paper highlights the problem faced in recent years through windfall developments in North Sunderland through the economics of brownfield developments leading to high density flatted developments in an area where there is no demand for flats. The urban area focus approach clearly works for both Washington and North Sunderland with the overall proportion of additional housing (6% and 10%) within the land identified by the recent SHLAA. Approach C could be improved and the pressure relieved on developing at higher densities if the presumption against the redevelopment of suitable greenfield land within the urban area is relaxed. There are examples of low value green space</p>	Comments noted

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												within the existing urban area that are not high quality or of particular value to a local community and as such their redevelopment can provide an impetus to regenerate an area, deliver much needed housing and compensate for the loss of open space by improving existing or planned off site open space. Approach D – Sub-area spatial requirements Recognising local sub-area priorities is the key to spatial planning and meeting the needs of existing communities. With this approach existing neighbourhoods will not be forgotten as anticipated by Approach A, development distributed according to local factors, making use of available and deliverable land. This presents the best spatial approach opportunity to meet local employment and housing needs throughout the city. To spread development according local priorities allows the Core Strategy to meet all pressing issues. The city centre will be allowed to perform its anticipated role as a critical driver in future economic competitiveness. South Sunderland will be developed in the most suitable and sustainable locations, where incursions into the open countryside will be made whilst protecting the Green Belt. Restricted development in Sunderland North and Washington reflect the limited opportunities for growth in these locations. And more effective and efficient use of the land availability resources the Coalfields has to offer will be important in developing this area as a managed growth location that will sustain and develop the existing communities and local economy. We welcome Approach D as this recognises other suitable development land opportunities will exist within the urban area. This is the polar opposite of the strict approach advocated by Approach C to concentrate fully on previously developed land which does not properly realise the assets of other otherwise suitable sites. Approach D will allow new development proposals to be assessed on a case by case basis based on new policy criteria, with an emphasis on the benefits of development through meeting local needs, meeting local and wider regeneration objectives and opportunities as well as estate	
Michael Hartnack	00916											I refer to your various correspondence in respect of the above and feel that I must make representation in respect of this matter. I certainly feel that the underhanded way in which this strategy has been developed is nothing short of a disgrace. I wonder, for example, the extent to which our local councillors have been kept informed or briefed re this matter. I spoke with Cllr Jack Walton a few weeks ago and he was totally unaware of the documentation which had been sent out to those I assume had made representation in the past. The brochure you sent me outlining the strategy, is totally misleading. It provides maps which are not to scale and even the most discerning of readers would not be able to determine the detail around the planning considerations.  The most attractive of options does not feature in respect of Seaburn/South Bents ie leave it as it is - open land between two built up areas. Most importantly however, your document gives no recognition at all to the need for an area strategy for the coast and Seaburn areas.  Personally, I get sick and tired of standing up for the area when clearly the Council either have no regard for the people and the area, or have such a short sighted vision of the future that nothing ever gets done. A strategy of the type you have consulted me about talks of the suitability of land for development - you should only be highlighting such areas for development when you have an overall strategy for the entire area. As a Sunderland resident almost all of my life, I become more and more dismayed and disappointed in this Council, who fail time and time again to take this City forward. The Vaux site is a disgrace and represents a massive failing of the council and Seaburn has been allowed to decay for years while our planning neighbours in South Tyneside and Newcastle have achieved much in their areas.  Please provide information of the extent to which local councillors have been briefed and consulted in respect of this document and the extent to which consultation regarding the proposals has involved the communities involved. I would also appreciate you sending me a copy of the strategy for the development of Seaburn and the timescales for such development. I assume that the Seaburn development strategy contains proposals for the development of the land you highlight within your LDF Core Strategy - if not why not?  Finally, can I say that the general public and the people you are supposed to serve, don't generally understand the development of all these strategy documents, especially when they are not acted upon - so why do you have to make them so secretive, underhanded and misleading?  I look forward to your response in connection with this matter as soon as possible please along with a detailed outline of the next steps to consultation with regard to this process.	A response to the points made was sent from the Planning Policy Manager to Mr Hartnack on the 5/11/09. Points addressed in the response included the purpose of the Core Strategy and Key Diagram, the specific purpose of the consultation and how it has been undertaken and the relationship between the Core Strategy and the Seaford Regeneration Strategy.
Carolyn Murray	01422											We are writing with reference to The Core Strategy proposal of ten "Strategic Sites", one of which is South Ryhope, "a large Greenfield site in the south of the city, accessed from the new Southern Radial Route", which would be developed as a business park for a range of employment uses.  We wish to oppose such a site, particularly as it will be adjacent to our housing estate which, even though it has only recently been completed, has already been adversely affected by the new road that now runs very close to our property. This road has created extra traffic passing near to our home and extra noise, both day and night.  We believe that a business park, particularly on land which is Greenfield, will add to that noise pollution, both day and night, which is not acceptable in a heavily residential area. We purchased this house because of its situation - not being overlooked or overlooking anything - and because it was tranquil, with a sea view and away from any industrial or domestic pollution.  With this proposed site will come even more traffic, which will exacerbate an already unacceptable situation, and this will most certainly affect the value of our home.	Comments noted. A response was sent to Mrs Murray via Councillor Lee Martin on 5/11/09. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham.
Cathryn Butler	1421											This document is very difficult to follow. It is written in a style that is more appropriate to a technical dialogue between town planners, engineers etc. The information contained in it is not readily accessible to members of the public. Therefore, it is very difficult to provide meaningful comments on the options that are described within the booklet.  This leads to the impression that the council do not want to engage in a full and open debate with the citizens of Sunderland about the future development strategy for Sunderland and that the true intent of the council is being concealed.	Response sent from Planning Policy Manager on 3/11/09. Comments noted. All consultation has been carried out in accordance with the Statement of Community involvement. Consultation material was prepared as far as possible in the simplest format, however, comments will be taken onboard as part of future exercises.
Gerald Hall	01424	Metnor Property Group Limited	2	1	3	4			No	Too much emphasis on overly large sites need smaller strategic sites to push forward such as Bonnersfield, St Peters Wharf.	Bonnersfield, St Peters Wharf should be given a core status it could have been well progressed on site if not rejected in favour of the over ambitious large core strategy sites.		Comments noted
Ward Hadaway (Andrew Moss)	00089	Comments on behalf of BDW Trading Ltd	2	1	3	4	In terms of an additional approach, there is an opportunity to alter the percentages in each of the sub areas. In this respect it is important that the western part of the City, namely Washington and the Coalfield area accommodates appropriate levels of housing development in the light of the important economic role of Washington and that the two areas accommodate 37 percent of the population. Acknowledging the above greater proportions of the development could be to the Washington and Coalfield areas with consequent reductions principally in South Sunderland.	Yes		At this stage we do not envisage a policy requirement to identify any further Strategic Sites.	A) According to PPS12 Para 2.1, spatial planning is a process of place shaping. In turn, PPS12 Para 4.45, notes that delivery is vital. A key theme running through this response is the need for the Core Strategy to deliver, BDW being concerned that this Strategy when finalised, must deliver.  B) Following on from the above it is noted that ten Strategic Sites are proposed across the City. It acknowledged that it is a generally desirable objective for the regeneration of these sites to happen. In parallel there is a need for the Strategy to ensure that the wider City is not stifled by undue expectations of when and what these Strategic Sites will deliver. Should there be undue expectations a likely result would be a continuation of the current unsatisfactory position, namely Strategic Sites remaining undeveloped and allocated housing sites, land adjoining the Dagmar Public House for example, being inhibited through the refusals of planning permissions.  Acknowledging the above it is vital that the Core Strategy is realistic and in turn that BDW Trading Ltd can have confidence to invest in delivery in the City. Acknowledging the above it is essential that the Strategy is deliverable, the requirement is that the evidence be strong enough to stand up to independent scrutiny, PPS12 Para 4.45.  There are two further main points I would make;  1) It is my understanding that a number of the strategic sites were intended to be developed with flats. In this respect I am instructed that mortgages for flats are severely constrained, if indeed available at all. This is as you are aware due to concerns of oversupply of flats and the need to diversify the stock, a position reflected in the RSS (reasoned justification Para 3.94) and the SHMA (Para 2.63). There must therefore be genuine concerns that high density schemes will not deliver over some if not all of the Plan period. That is particularly the case acknowledging that a number of these sites have not delivered over the 'good times'.  2) I note that a number of the strategic sites are to be accessed by an 'iconic new road bridge'. If that is to be the case there needs to be confidence as to when and how this road bridge will be delivered especially in these times of expected public expenditure cuts which likely will include reductions in the infrastructure budget.  Acknowledging the above it is vital that the Core Strategy is flexible. As detailed in PPS12 Para 4.46, it will be necessary for the Strategy to be able to show how it will handle contingencies and what alternative strategies have been prepared to handle uncertainty and what would trigger their use. It is essential therefore that there is an effective and deliverable plan B. In this respect the following comment under Core Strategy Approach C is noted with concern;  "Shortfall in housing approx 1,500 homes, to be made up with higher density housing and housing on released employment land" It is unclear whether this annotation pertains solely to Approach C or is a general fall back position to each of the Approaches. The comment 'to be made up with higher density housing' is of great concern. The reason for this is if high density Strategic Sites are not delivering, in my view there can be little confidence that seeking to increase the density of housing elsewhere above the usual minimum threshold will be;  - effective in securing delivery,  - desirable, the City needing to widen its housing choice, the City for historical reasons having considerable levels of high density housing. There is therefore a need to provide more range and choice in the housing products available.  Following on from the above the RSS specifically notes the need to provide for a better mix of dwelling types and sizes, reasoned justification 3.94 and this need is also reflected in the SHMA. The comment therefore appears to buck the trend, need and policy requirements.  Spatial Approaches – Question 1  It is evident that each of the Approaches suggest the greatest levels of development in South Sunderland. It is within South Sunderland that the majority of the Strategic Sites are located. As noted above there is concern as to whether these Strategic Site will prove deliverable in whole or part. That is particularly the case acknowledging housing numbers are minimums, not maximums. There is therefore a policy requirement that they be met. Approaches A, C and D envisage at least 56% of additional housing in South Sunderland. As detailed previously there needs to be robust evidence capable of standing up to external scrutiny that such figures are deliverable within the Plan period.	Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.  The Employment Land Review 2009 recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production.  Comments noted - issues of delivery and the density of housing are to be considered through the Core Strategy.	

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											<p>RSS policy 9.1a requires that within the City priority be given to regeneration of the River Wear Corridor in Central Sunderland. In turn, in relation to housing RSS policy 9.3c requires the development of housing to support the economic growth strategies in sustainable locations, mainly on previously developed land in area where it does not undermine existing housing markets. In this respect it is evident from the SHLAA (Table 7) that Washington accommodates 20 percent of the City's population. According to the SHLAA (Table 6), Washington only has capacity on SHLAA sites to meet 6 percent of the City's requirement over a 15 year period. In turn it is evident that the majority of Washington's contribution will come from sites expected to deliver in the first 5 years with only 285 dwellings in years 5 – 15, just 2 percent of the supply.</p> <p>Each of the Spatial Approaches suggests a new strategic employment site in Washington of between 15 and 33 hectares, an allocation which is supported. Acknowledging that Washington is already a principal employment location, that a Strategic Employment Location is proposed, and that it accommodates 20 percent of the population, it is important that it accommodates commensurate levels of housing development over the Plan period.</p> <p>For these reasons BDW Trading would rank the possible approaches as follows from 1 (preferred) – 4 (least preferred);</p> <p>Preference 1 Approach B, namely the provision of at least 15 percent of additional housing in Washington with a reasonable proportion, 20 percent to the Coalfield which is well related with lesser levels but still 50 percent to South Sunderland;</p> <p>Preference 2 Approach A, which would see 12 percent of additional housing in Washington with 14 percent in the Coalfield, 62 percent of additional housing in South Sunderland is of concern;</p> <p>Preference 3 Approach C</p> <p>Preference 4 Approach D</p>	
Claire Megginson	01291	Association of North East Councils									<p>Introduction This report assesses whether the alternative approaches identified within the planning document are in general conformity with the Regional Spatial Strategy (RSS) (2008). The report outlines where the proposed alternative approaches will contribute to the implementation of regional planning policy, and identifies any inconsistencies with the RSS.</p> <p>Background The core strategy will set out the overarching framework for the development of the city until 2026. An issues and options report was published for formal consultation in late 2005 and in December 2007 an initial preferred options report was published for consultation. The NEPB provided a response on both occasions. The findings of the consultation included advice from Government that more detailed work was required to strengthen supporting evidence and also to provide a more robust range of options for the spatial development of the city. The city council is now consulting on four spatial development approaches including a number of strategic sites whose development the council considers vital to achieving any of the options. The results of the consultation will allow a core strategy preferred option to be finalised.</p> <p>Alternative approaches Approach A – Focusing development upon the conurbation</p> <p>This approach principally concentrates on development and growth of the city centre/central Sunderland, with further focus on Washington and the main built-up area of Sunderland only. Sustainable growth is permitted in Houghton and Hetton.</p> <p>Approach B – Proportional distribution of development This approach aims to provide a proportional distribution of development (broadly reflecting population and land area) across the four sub-areas, with additional development weighting on the city centre and central Sunderland area.</p> <p>Approach C – Focus development within the current urban area This approach concentrates development within the existing urban area and on suitable previously developed land (brownfield), retaining open space and countryside.</p> <p>041109_NCole.cn Approach D – Sub area spatial requirements This approach focuses on bringing together local sub-area needs and priorities to form a sustainable city-wide approach. Regional Spatial Strategy policy context</p> <p>Approach A focusing development on the conurbation most closely follows RSS locational strategy set out in policy 6 which advocates the concentration of the majority of new development within the Tyne and Wear conurbation, which includes Washington and the main built-up area of Sunderland. The remaining areas comprising Houghton-le-Spring and Hetton-le-Hole (known as 'the Coalfield') are classed as regeneration towns in policies 6 and 9 where development should be sustainable without adversely impacting on the regeneration initiatives within the Tyne and Wear conurbation. Policy 9 for the Tyne and Wear city-region gives priority to the regeneration of the River Wear corridor in central Sunderland. Approach B aims to provide a balanced proportion of development and includes increased levels of development within the coalfield regeneration areas. If this option was to be pursued further the council would need to ensure that to conform with RSS policies 6 and 9 that development in these locations would be sustainable and would not adversely impact on the regeneration initiatives within the conurbation.</p> <p>Approaches A, B and D would enable the city to provide the RSS housing requirement of 16,415 dwellings. Option C focuses development within the current urban area and this results in limitations to land supply which would mean that 1500 less dwellings could be accommodated. It is stated that this shortfall will be made up with higher density housing and housing on released employment land. RSS policy 18 sets out the regions employment land portfolio. Paragraph 18.2a seeks to ensure the need to protect employment land and premises from redevelopment to alternative uses where they are an essential part of the long-term employment land and premises portfolio. Sunderland are required under policy 18 to provide 225ha of employment land. 100 ha of new employment land will need to be found to meet this requirement. Existing employment land is therefore a key part of future supply and to conform with RSS policy 18 this land would need to be protected from redevelopment to alternative uses.</p> <p>Approach D is based on land availability within the four sub areas. This includes comparatively higher levels of development within the coalfield area and lower levels of development within Washington. As with approach B if this option was to be pursued further the council would need to ensure that to conform with RSS policies 6 and 9 that development in these locations would be sustainable and would not adversely impact on the regeneration initiatives within the conurbation.</p> <p>Approaches A and B include greenbelt incursions for housing and all options include greenbelt incursions for employment land. RSS Policy 4 sets out the sequential approach to development giving priority to previously developed land and buildings in the most sustainable locations. In order to conform with RSS policy , any incursions into green belt as part of the core strategy will need to provide robust evidence demonstrating that the sequential approach has been followed and that there are no sequentially preferable sites that could accommodate development.</p> <p>Strategic sites The core strategy proposes ten strategic sites. These are large sites (or infrastructure) considered vital to ensuring that the council's aim of regenerating the city can be achieved. It is considered by the council that if these sites were not to be developed then the ability to attract investment, create significant numbers of new jobs and houses and improve major derelict sites in key areas of the city would be severely limited.</p> <p>Five of the strategic sites: Groves; Farrington Row; Stadium Village; Vaux; and Holmeside are within central Sunderland or along the River Wear corridor and are therefore a key priority for development and regeneration in RSS policies 6 and 9. The Port is included as a strategic site for port-related development and employment use. This conforms with RSS policy 22 which states that plans should support the growth of the region's ports and with policy 4B which seeks to achieve good surface access and multi-modal links to all the region's ports.</p> <p>Two strategic sites are included for employment uses. South Ryhope is a large Greenfield site in the south of the city, accessed from the south of the city from the new southern radial route and would be developed as a business park for a range of employment uses. North of Nissan is located adjacent to the A19 and would be able to accommodate a range of large scale employment uses. All of the alternative approaches include the strategic employment site in the green belt north of Nissan in Washington. The scale of this site ranges from 15ha in approach B to 33ha in approaches A, C and D. RSS policy 20 identifies key employment locations ranging from 25ha to 200ha. The site identified north of Nissan is not included within the RSS key employment locations. As detailed in paragraph 14 above any incursions into green belt as part of the core strategy will need to provide robust evidence demonstrating that the sequential approach has been followed and that there are no sequentially preferable sites that could accommodate development.</p> <p>Two key infrastructure links are identified under the strategic sites heading. Sunderland strategic transport corridor links the A19 to the development sites on the riverside and the city centre and the port. It will cross the river on an iconic new road bridge west of the Queen Alexandra Bridge. The central route will greatly improve access to the employment areas of Sedgelych and Dumbrie. RSS policy 55 seeks to improve access, particularly by public transport between the conurbations and regeneration towns within the city regions. In order to conform with policy 55 proposals for the new infrastructure links should be supported by a package of measures to improve accessibility by a range of transport modes.</p> <p>Conclusion At this stage in the core strategy process a range of alternative approaches are being explored. This report highlights key areas where the alternative approaches would need to demonstrate conformity with the Regional Spatial Strategy. The next stage in the process is the development of a preferred option or approach. In the broadest terms the alternative approaches have attempted to ensure conformity with the RSS, however there are challenges for the city in meeting employment land and housing number targets whilst also following the RSS locational strategy. It is important at the preferred option stage that the core strategy provides a clear locational strategy based on RSS policies 6 and 9 and following the sequential approach outlined in RSS policy 4.</p>	Comments noted
Ian Radley	00965	Highways Agency	3	1	2	4					<p>Overview In relation to future development aspirations in the areas, the Agency has been in recent discussions with officers at Sunderland City Council (SCC) with the aim of firstly determining the nature of future development, and secondly, considering the implications of such development aspirations on the operation of the Strategic Road Network (SRN).</p> <p>The culmination of this work has been the development of a Traffic Impact Assessment Tool (TIAT) that considers the potential impacts at the SRN associated with future housing and employment sites. This TIAT has been made available to SCC for use in considering the sites.</p> <p>Linking these ten strategic sites to the recent TIAT assessments undertaken, Table 1 provides comments in relation to the strategic sites: Site Core Strategy Stated Content TIAT assessment Content TIAT Outcome 1. North of Nissan Large scale of employment uses 54,439sqm of B1/B2/B8 (Turbine Business Park) Impact greater than 100 two way trips on the Strategic Road Network 2. Groves City centre housing site (35ha) Mixed use (elements of B1) Less than 30 two way trips on the Strategic Road Network 3. Farrington Row Office and housing development Mixed use (elements of B1) – including Vaux site Less than 30 two way trips on the Strategic Road N</p>	Comments noted. We will take the comments forward as appropriate in terms of reviewing evidence papers, and the results of the TIAT will continue to inform the sites as they are taken forward through the Core Strategy.

Customer Details			Spatial Approaches				Strategic Sites			Other Comments	Officer Response
Name of Respondent	Cust Ref	Company/Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?
											<p>4. Stadium Village Large scale leisure (with housing and employment) "Stadium Park" Mixed use (elements of B1) Less than 30 two way trips on the Strategic Road Network</p> <p>5. Vaux Offices (and new homes) Mixed use (elements of B1) – including Farrington Row site Less than 30 two way trips on the Strategic Road Network</p> <p>6. Holmeside Retail "Holmeside Triangle" Mixed use (elements of B1) Less than 30 two way trips on the Strategic Road Network</p> <p>7. The Port Port related uses and employment opportunities Development type unknown -</p> <p>8. South Ryhope Employment uses B1/B2/B8 mixed site Between 30 and 100 two way trips on the Strategic Road Network</p> <p>9. Sunderland Strategic Transport Corridor New road Not assessed -</p> <p>10. Central Route New road Not assessed -</p> <p>Table 1 – TIAT Assessment Results</p> <p>It should be recognised that the TIAT analysis is of a very broad nature and considers the best available information available at the time of assessment. Given some of the differences in scale / nature of development identified above (e.g. at Holmeside Triangle) these results should be considered fully in relation to the information that was afforded at the time of assessment.</p> <p>Therefore, whilst the TIAT results provide an indication of the likely individual consequences of the development proposals at the SRN, the Agency would wish to ensure that the development identified in the Core Strategy could be accommodated in relation to the effect on the safe and efficient operation of the SRN. Further the cumulative impact of development aspirations in Sunderland will also need further consideration. A review of the evidence base provided in support of the strategic sites will enable the Agency to come to a view with regard to the adequacy of consideration given to these impacts. This evidence base review is provided below.</p> <p><b>Evidence Base</b></p> <p>In order to deliver the objectives of the strategic sites within the Core Strategy and to provide background evidence, the Assessment of Transport Paper 1.24 (Strategic Sites) has been produced. Whilst the topic paper covers a range of supporting evidence, the elements of the paper that the Agency has given consideration to are those that relate specifically to the transport – land-use interaction. In relation to the definition of a strategic site the topic paper identifies that in terms of accessibility – "the site is within the urban area and adjacent or close to significant public transport facilities or a bus / metro corridor, or is in a location where it can (or could) be accessed by a variety of means of transport," and in terms of vehicular access – "Adequate vehicular access will also be an important feature in ensuring that the development will function." It is unclear as to what evidence or analysis is provided to suggest that each of the sites is accessible (particularly when the strategic site summary page for the 'North of Nissian' site indicates no public transport accessibility). Further, in relation to vehicular access, it is unclear as to what assessment has been undertaken to consider the implications of development on the surrounding road network (including the SRN) or the effect that the operation of the surrounding network has on access to the site. There exists a risk that such consideration is left to the planning application stage and only then is it realised that in order to deliver the sites, there are substantial infrastructure requirements that deem the site unfeasible.</p> <p>Specifically in relation to Strategic Infrastructure, the topic paper outlines that "...in order to secure regeneration of the regional economy "transformational intervention" is required in the form of further investment in transport infrastructure and more creative use of the transport network is essential in enabling the Region's businesses to deliver their goods to market and in supporting sustainable labour mobility". The evidence goes on to highlight two road-based schemes, but no sustainable transport proposals. Nor is it clear as to how the road-based schemes would contribute to dealing with the impacts of the strategic sites or other sites proposed in each alternative option. It is essential that such strategic access issues are fully incorporated to the Core Strategy given their particular relationship to the vision, objectives and other policy aspirations.</p> <p><b>The Alternative Approaches</b></p> <p>The following section summarises the four alternative approaches to strategic development in the area and the considerations of the Agency to each.</p> <p><b>Approach A – Focusing development upon the conurbation</b>  <i>Concentration on city centre / central Sunderland. Further focus on Washington. Sustainable growth in Middlesbrough and Winton.</i>  The Agency considers that this approach, being in line with the Regional Spatial Strategy (RSS) and offering the focus of development in the city centre, which is likely to be the most sustainable and accessible location, as being a suitable approach. However, the Agency would wish the supporting evidence to consider the implications of the approach on the SRN (particularly as accessibility to the A1 is highlighted as being a strength) and a consideration to be given to the potential impacts of the approach on the operation of the SRN. Also, the Agency would wish that further information is provided to detail the "Improved City Region transport connections".</p> <p><b>Approach B – Proportional distributions of development</b>  Proportional distribution of development. Additional development weighted on city centre / central Sunderland.</p> <p>The Agency recognises the needs of the different sub-areas and that development will to some extent be dispersed throughout the authority. However, the idea that the aim of this approach would make sub-areas "self-sufficient" is considered to be unrealistic. Further, the approach identifies that development may be required in peripheral and less accessible locations, which is considered to be an inappropriate approach in minimising the need to travel. The Agency would wish supporting evidence to consider the implications of the approach on the SRN (particularly as accessibility to the A1 is highlighted as being a strength) and a consideration to be given to the potential impacts on the operation of the SRN.</p> <p><b>Approach C – Focus development within the current urban area</b>  Concentrate development in existing urban area and on previously developed land.  The Agency considers that this approach, being in line with the RSS and offering the focus of development in existing urban areas, which are likely to have good existing levels of accessibility, as being a suitable approach. However, it should be recognised that brownfield sites are not necessarily the most accessible locations and as such the supporting evidence would be expected to give consideration to specific accessibility issues of each area / site. The Agency would wish supporting evidence to consider the implications of the approach on the Strategic Road Network (particularly as accessibility to the A1 is highlighted as being a strength) and a consideration to be given to the potential impacts on the operation of the SRN.</p> <p><b>Approach D – Sub-area spatial requirements</b>  Sustainable city-wide approach reflecting sub-area needs.</p> <p>The Agency considers that the approach is similar to that identified in approach B, albeit with a specific mention of "sustainable transport connections". However, the approach identifies that development may be required in Greenfield areas which are more likely to be less accessible.</p> <p>The Agency would wish supporting evidence to consider the implications of the approach on the SRN (particularly as accessibility to the A1 is highlighted as being a strength) and a consideration to be given to the impacts on the operation of the SRN.</p> <p><b>Alternative Approaches Summary</b></p> <p>Overall, the Agency would consider that there are elements of the various approaches that should be incorporated and taken forward into a preferred option. The most accessible and sustainable locations should be those prioritised (therefore approaches A and C would seem to be preferred), however approach D is the only approach suggesting the need for sustainable transport connections. To appropriately deliver the aspirations of the city, even with the selection of the most sustainable sites, it is considered that sustainable transport connections should form a part of any approach taken forward and should be supported by appropriate evidence.</p> <p><b>Evidence Base</b></p> <p>A comprehensive and robust evidence base is vital in highlighting that the options chosen have been fully considered and selected on the basis of their merits. The following gives consideration to the evidence provide in the portfolio of supporting documents and background topic papers, and focuses on the issues of particular interest to the Agency, again the land-use – transport interaction.</p> <p>The Alternative Options document identifies (in paragraph 3.3) a number of recurring themes from previous consultations, many of which are pertinent to the interests of the Agency (transport corridors, accessible locations, sustainable sites). Given the recognition of these themes at previous stages it would be expected that these issues would be fully considered and evidence gathered to support them.</p> <p>Each relevant topic paper is considered individually below.</p> <p><b>Topic Paper 1.6 – Connectivity</b>  The topic paper recognises that transport will contribute to the realisation of the Core Strategy. Whilst the paper outlines a number of statistics in relation to connectivity patterns such as travel to work / car ownership / public transport, it is not clear how consideration has been given to this range of information in contributing to the future strategy.</p> <p>In relation to the Impact of Development on the SRN, specific information is provided in the topic paper which is considered to relate to the Agency's consideration of the 2008 SHLAA and as such should not represent the overall views of the Agency. Whilst it is recognised that a number of individual sites will in themselves impact on the SRN, no consideration is given to the comments provided by the Agency in response to the SHLAA in relation to the cumulative impacts or the need to reduce the need to travel and improve sustainable accessibility. Further, the conclusive sentence to this element of the topic paper is that "In order to mitigate against this happening (increased congestion), the Highways Agency will be informed of any future new developments". The Agency considers that this is not an appropriate mechanism and would wish to be fully involved in the formulation of policy early in the planning process. Leaving such decisions to the planning application stage is not considered to be appropriate or consistent with the provisions of PPS12 in relation to good infrastructure planning nor guidance set out in Circular 02/2007: Planning and the Strategic Road Network.</p> <p><b>Topic Paper 1.1 – Economy</b>  The topic paper outlines that "effective and efficient infrastructure is intrinsic to successful economic development" and that "emerging policy guidance should aim to identify either locations or key routes for which economic development should be encouraged to benefit from existing and future transport infrastructure." The Agency considers that the issues of infrastructure (transport) and accessibility should, in as much as they can, assist in guiding the Core Strategy approach in addition to being a policy consequence of the emerging approach. If not considered in such a way and at this stage of the process, the risk comes that an infrastructure constraint may be required to support one of the strategic sites. Given the importance of the strategic sites to the Core Strategy, all supporting measures associated with them should be identified. It is not apparent whether this exercise has been undertaken.</p>

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												<p>Further, the topic paper provides a plan of land allocated for economic development. For comparative purposes this plan (figure A.1) and a plan of sites identified by Sunderland in recent discussions (figure A.2) is appended to this letter which identifies some key differences. This highlights that, although the TIAT analysis work undertaken recently assists in identifying potential impacts at the SRN, the analysis undertaken may not be relevant if only a proportion of development aspirations have been assessed.</p> <p>Topic Paper 1.4 – Housing The topic paper outlines that “ensuring housing is allocated in conjunction with planned infrastructure and required utilities are in place” and “ensuring that the location of new housing is linked in with different modes of transport and people have a choice in how they travel to and from their homes”. While such issues of infrastructure and sustainability may have been considered in the site selection process, it is not clear how such assessments have been undertaken, nor is this particular evidence contained in the topic paper relating to supporting transport measures and policy requirements resulting from the housing sites.</p> <p>Evidence Base Summary Whilst the evidence provided does consider cross-cutting themes, it is not considered that a detailed investigation of the cross-cutting issues (most pertinently in relation to the relationship between the strategic sites / housing / economic and transport (connectivity)) has been undertaken. Nor is it clear how the consequences of such themes are to be dealt with in policy terms of future drafts of the Core Strategy.</p> <p>Summary The above review of the Alternative Options Core Strategy builds on the consultation responses made by the Agency to the previous draft of the Core Strategy. In summary:</p> <ol style="list-style-type: none"> <li>1. In relation to the strategic sites, the Agency would wish to ensure that they could be accommodated in relation to the effect on the safe and efficient operation of the SRN. It is unclear as to what evidence or analysis suggests that each of the sites is accessible or considers the implications of development on the surrounding road network (including the SRN). There exists a risk that such consideration is left to the planning application stage and only then is it realised that in order to deliver the sites, there are substantial infrastructure requirements that deem a site unfeasible.</li> <li>2. In relation to the alternative approaches, the Agency would consider that there are elements of the various approaches that should be incorporated into a preferred option. The most accessible and sustainable locations should be those prioritised (approaches A and C), however to appropriately deliver the aspirations of the city, even with the selection of the most sustainable sites, it is considered that sustainable transport connections (Approach D) should form a part of any approach taken forward.</li> <li>3. In relation to the evidence base, whilst the evidence provided does consider cross-cutting themes, it is not considered that a detailed investigation of the cross-cutting issues (most pertinently in relation to the relationship between the strategic sites / housing / economic and transport (connectivity)) has been undertaken. Nor is it clear how the consequences of such themes are to be dealt with within policy of the revised preferred options core strategy.</li> </ol> <p>This review of the Alternative Approaches should be considered alongside the review undertaken by the Agency in relation to the December 2007 draft of the Core Strategy Preferred Options which set out how policy should reflect the needs of the Agency.</p>	
Gareth Hunter	00269	Government Office for the North East										<p>The consultation material has a number of strengths, in that it draws upon the context of the Sustainable Community Strategy, presents a wide range of issues for local community views and it is laid out in an accessible manner. There is a good explanation of statistics and local circumstances affecting Sunderland, providing a useful background. There are, however, some issues which will need to be addressed before the plan proceeds further.</p> <p>Core Strategy objectives and linkage with policy influences</p> <p>Within the DPD and supporting papers there appears to be comprehensive referencing to the context of national policy, the Regional Spatial Strategy and the Sunderland Strategy (Sustainable Community Strategy). Many spatial issues and influences are also recorded. In developing the next stage of the plan's 'preferred options', the Core Strategy policies to deliver LDF spatial objectives should be consistent with but avoid repetition of national policy and they should be in general conformity with the Regional Spatial Strategy.</p> <p>The next step in the process will be to translate and develop the evidence base into refined 'preferred options'. For the preferred strategy to be achievable there should be no hidden barriers to delivery. Effectively the challenge is identifying "who, what, where, when and how" with regard to policies and strategic allocations in the Core Strategy. Strategic Sites are identified within the plan and these and other Core Strategy policies will provide the spatial context for development management decisions and other subsequent DPDs prepared by the Council.</p> <p>If the Local Planning Authority (LPA) elects not to follow relevant statements of the Government's planning policy, they must give clear and convincing reasons why, and such an approach should be supported with sound evidence that it is justified by local circumstances. In these terms it is good to see that the consultation paper is supported by a wide range of topic papers upon the Council's web site. These appear to summarise evidence base which the Council can draw upon in formulating local policy specific to Sunderland's aspirations.</p> <p>Translation of broad spatial options into specific detailed preferred options</p> <p>In the context of the influences above, PPS12 requires consultation with the community and delivery partners on options for Core Strategies. Plan making authorities are now given more flexibility in the way that they go about preparing their plans and achieving public engagement to explore this.</p> <p>The September 2009 report represents a first stage under regulation 25 of the Town and County Planning (Local Development) (England) Regulations 2004 (amended 2008). Further consultation on 'preferred options' under this regulation is programmed within the Sunderland Local Development Scheme. These stages will seek out and evaluate reasonable alternatives promoted by the LPA and others, prior to consultation on a publication DPD under regulation 27. It is observed that many of the options suggested in the September consultation represent strategic spatial options for different percentages or amounts of development to be broadly allocated within four geographic sub areas of Sunderland. This represents a useful beginning in gaining the local community's views. The options are strategic in nature, and are generally not place or site specific - albeit Strategic Sites have been identified.</p> <p>In moving to the next stage of plan preparation it will be important to ensure that the choices regarding the amount / location / phasing of development in Sunderland are reasonable, quantifiable, and deliverable and sufficiently location specific in presenting policy options to deliver Core Strategy objectives. The outcome of this wide ranging analysis of alternatives will be to draw conclusions leading to the preferred options for consultation at which point the community may comment or suggest others.</p> <p>Implementation and Deliverability</p> <p>The consultation material and supporting topic papers contain many references to delivery partners and other issues which affect the future deliverability and aspirations of the plan. A good start has been made in this regard. As a suggestion, a positive step for the next round of consultation would be to accompany the preferred options version of the plan with a specific implementation and delivery strategy. This could also include draft targets and indicators for monitoring (a tabular format might be useful – which other LPAs have used). These would follow the SMART principle of being specific, measurable, achievable, realistic and time bound and could also utilise the COUNT principle of collect once use numerous times - where wider Council services or other partner's information sources can be utilised.</p> <p>The purpose of this would be to draw together the references to delivery aspects contained within individual topic papers and to show how each of the policies within the preferred options of the DPD would be delivered. The clear read across to monitoring arrangements as the plan develops is crucial to charting how successful delivery, or difficulties, will be observed or remedied.</p> <p>Implementation and delivery is an aspect of the plan where the Planning Inspectorate will be giving particular focus to ensure that the DPD has the support of all delivery partners, or where potential barriers to delivery are identified. This includes an appropriate consideration of the plan's flexibility and contingency arrangements.</p> <p>For example, which partners are responsible for delivering different aspects of the plan, and are there contributory sources of funding or other delivery mechanisms that can be catalogued to show the plan can be delivered over short, medium and long term horizons (within the timeframe of the plan)? Also for example, in terms of cross boundary issues, if the plan were to place reliance upon a preferred option of a strategic waste management facility (to partly serve Sunderland) being provided within an adjacent planning authority, what contingency options are there within the Sunderland DPD should this preference not occur? Therefore, you may like to review the good work begun in this respect and consider the value of gathering delivery issues together within a specific Implementation and Monitoring document to accompany the DPD.</p> <p>Strategic Sites</p> <p>PPS12 states in paragraph 4.6 "Core strategies may allocate strategic sites for development. These should be those sites considered central to achievement of the strategy. Progress on the core strategy should not be held up by inclusion of non strategic sites". The DPD appears to identify 8 Strategic Sites and two important transport corridors.</p> <p>It is therefore important that the LPA is able to justify its selection of these sites and consider if some of them can not either be omitted or left to subsequent allocation DPDs - to maintain focus and avoid delay. A fresh objective approach should be taken within the Core Strategy with the avoidance of sites not central to the Core Strategy's delivery creeping into the plan where they could be picked up later. The Plan Making Manual on the Planning Advisory Service web site is soon expected to contain some new advice in this regard and the Planning Inspectorate published 'Examining DPDs: learning from experience' in September 2009 (paragraphs 30 to 32 are relevant). It is also important to consider how Strategic Sites will fit with wider infrastructure delivery. For example, consideration could be given to whether Strategic Sites within central Sunderland could help to support the delivery of the Sunderland Strategic Transport Corridor. In terms of implementation, this might include using planning obligations, or subject to Community Infrastructure Levy regulations coming into force, there may be the opportunity to secure appropriate funding from the development of strategic sites in support of allocated public funding of transport infrastructure.</p> <p>In terms of whether other sites are central to the delivery of the strategy are they sufficiently spatially justified? Is the criteria used to justify their inclusion based upon appropriate factors as outlined in PPS12 and what does the Sustainability Appraisal say about these sites in relation to each other and their delivery of all Core Strategy spatial policy objectives? Therefore the deliverability of the plan including evidence of existing and planned infrastructure supporting preferred options is a key part of the tests of soundness.</p> <p>Plan Appraisal</p> <p>The DPD recognises the need for testing the plan with regard to Sustainability Appraisal (SA) and other legislative requirements. An SA report accompanies the plan and the next stage of consultation upon preferred options is likely to contain preferred policy options for delivering the objectives of the plan and reference to discounted options which have been evaluated and tested. The principle would be to 'front load' the contents of plan with the consideration of reasonable alternatives, with the aim that once publication is reached most if not all significant alternative will have been considered and Such and approach should also help to meet the requirements of the EU Strategic Environmental Assessment Directive, and the EU Habitats Directive should also be considered in terms of any relevant affected or nearby wildlife sites being considered within the formulation of the plan.</p>	Comments noted and actioned as appropriate



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England and Lyle	00274	Northumbrian Water										NWL has no preference for any of the four Core Strategy Approaches presented in the Core Strategy. At this stage, NWL considers that the level of detail in the Core Strategy material published in September 2009 is not adequate enough to distinguish between the alternative spatial approaches in terms of what they would mean for the Company's water supply and wastewater infrastructure capacities. Regardless of which of the four spatial approaches is chosen as the 'preferred option', close liaison with NWL at the earliest possible stage remains essential to assessing the impact of proposed future development locations and site specific proposals to ensure the soundness of all Local Development Plan Documents. In this regard, NWL would attach particular importance to the statement in paragraph 7.7 of the Core Strategy Topic Paper on Utilities Infrastructure (February 2008) which states that "Any policy should ensure that development and utility/infrastructure develop in parallel." The Company continues to regard this as a statement of common ground between itself and the Council.	Comments noted
Rose Freeman	00394	The Theatres trust										The Theatres Trust is The National Advisory Public Body for Theatres. The Town & Country Planning (General Development Procedure) Order 1995, Article 10, Para (v) requires the Trust to be consulted on planning applications which include 'development involving any land on which there is a theatre.' It was established by The Theatres Trust Act 1976 'to promote the better protection of theatres'. This applies to all buildings that were either built as theatres or are used for theatre presentations, in current use, in other uses, or disused.  Due to the specific nature of the Trust's remit we are concerned with the protection and promotion of theatres and therefore anticipate matters relating to cultural facilities.  We would like to praise the design of the alternative approaches document that was sent out with the consultation letter, unfortunately this consultation does not come within our remit so we are unable to respond.	No response required
Julie Hutchinson	01339		2	1	3	4			Yes				No response required
Andy Corbett	01340		4	3	1	2	There is sufficient brownfield space available across the city to avoid the need for developing on green belt / countryside space.		Yes				Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites.
Duffy	01341		1	4	3	2							No response required
J Daly	01342		3	4	2	1			Yes				No response required
Dave Poole	01343		1	2	4	3			Yes				No response required
Laura Hall	01345		1						Yes				No response required
Jill Meadows	01344		2	3	4	1			Yes				No response required
Carol Harrison	01346		4	1	3	2	I have no comments to make at this time		Yes				No response required
Clive Greenwood	01347		3	4	2	1			Yes				No response required
Vanessa Jones	01349								Yes				No response required
Kath van Eyssen	01350		2	1	3	4			Yes				No response required
Ahms Hossain	01366												No response required
Charlotte Till	01367		3	4	2	1	Like approach D but would prefer to see other areas developed rather than the countryside south of Ryhope and Doxford Park - such as the space between Gilley Law, Farringdon and Doxford Park, the space west of Vicarage lane in Silksworth ( according to the map) and Herrington east of the A19.		Yes				Comments noted. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham. Other sites mentioned would be too small scale to feature in the Core Strategy.
Susan Houghton	01368		2	3	1	4							No response required
Mary Macdonald	01408		1	2	4	3	We need a vibrant and attractive City centre with no unattractive spots. Anyone arriving by bus, train or metro should have an immediate positive impression, this will benefit tourism as those arriving for events should have a high quality initial experience.		Yes				Comments noted
Mark Metcalf	01409		3	2	4	1			Yes				No response required
Ashley Curle	01410		1	2	3	4			Yes		Ryhope Hospital Sites		Comment noted. Cherry Knowle hospitals site is to be taken forward through the Core Strategy. The Hospital site would not fall within definition of Strategic Site as outlined in PPS12. The site is identified as Location for Major Development (for new hospital) in sub-area policy.
Gareth Hunter	01419		3	4	1	2			No	Ryhope greenbelt south of the new radial route	this is one of the few open sites left along the coastline in the sunderland area		Comments noted. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham. Other sites mentioned would be too small scale to feature in the Core Strategy.
David Auld	01018											RE: Millhouse Scrapyard, Washington - (Millhouse Scrapyard site - Planning Application No. 04/01163/SUB). Having reviewed the strategy document, we strongly feel that there are several key elements which significantly relate to the Millhouse Scrapyard site. This site is currently an Authorised Treatment Facility (ATF) for End of Life Vehicles (ELVs) with a fully approved Environmental Waste Management Licence (No. TW379SL). The site has been operating as a Scrap Yard for the last 55 years. The heavy industry usage has left the land scarred and damaged, and therefore can never be returned to open green meadow / ancient woodland. If our operations were to cease, the land would inevitably be regarded as a contaminated, brown-field site. In January 2005, we were granted outline planning permission for commercial re-development, despite opposition from the Senior Planning Officer (Steve France). With strong support from local MPs and Councillors, the Application was approved by the Planning sub-committee, who felt that the site had been wrongfully classified as Green Belt designated in the area. The inappropriate classification of the land as Green Belt has prevented us from moving forward with our business and increasing future re-cycling capability. We wish to redevelop and modernise the site to enable us to handle the ever growing volume of recyclable waste we are faced with. This is a key issue in current Local and National Government Policy. We strongly believe there is now an excellent opportunity under the present review of the Green Belt allocation in the LDF Core Strategy, to re-allocate this site as non Green Belt, thus unlocking opportunities for Sunderland in terms of increased recycling capacity and additional employment. This case has an extensive history of supporting evidence assembled in the 15 years since our first discussions with the Council. Whilst i have tried to provide a detailed yet brief outline of the case, there is much more information and documentation which i am keen to share and discuss with you. I have enclosed a site location plan for your information. (Please see hard copy letter).	Comments noted, although this is not a strategic issue, and the site specific boundaries will be considered through the allocations DPD.
Mr Fredrick Miller	00920		3	4	2	1			Yes				No response required
Mrs Dorothy Miller	00920		3	4	2	1			Yes				No response required
Tim Wright	01425						I don't believe any of the approaches are sufficiently visionary enough to achieve a truly sustainable city. I believe the way 'Sustainable Growth' is used is a misappropriation of the term. Likewise 'a sustainable city wide approach' how can this be when three of the options have a 'significant negative impact' on the green belt in north sunderland.		No	I don't believe any of the sites provide the potential to make sunderland a truly sustainable city and there needs to be more detail in what is proposed for each site. Appreciate however at this stage you can only provide headlines.			Comments noted

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Mr David G Tatters	01426		4	3	1	2	Green Belt land in north-west Washington should be preserved and not used for housing development.		Yes	Site 1 (North of Nissan) should be extended westwards using further agricultural land for employment purposes.			Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production
Mr C Narrainen	01427		2	3	1	4			Yes				No response required
Mich					1				Yes				No response required
Ronald McQuillan	01348						None of these approaches provide joined up thinking re road networks. I think plans are not in the public interests I cannot understand how a LDF replaces UDP's and in conformity with Town and Country planning legislation.		No	5. Vaux, 9. SSTC, 7. The Port, the iconic bridge and 2. the Groves site.	The advent of Nissan cars and call centres should be additional to, not in place the varied manufacturing industries traditional with and appropriate to the River Wear at Sunderland.		Comments noted. The 2004 Planning and Compulsory Purchase Act requires Local Authorities to prepare Local Development Frameworks. The Core Strategy overall has the intention to ensure a wide portfolio of land to accommodate a variety of business sectors.
Mark Ricketts	01428		2	3	1	4	I think it is disappointing that a Greenfield site South of Ryhope is proposed to be developed, when there are brownfield sites around the city, in the coalfield area in Hendon, which could be developed instead, or current industrial sites at Doxford or in Washington which could be expanded.		No	8. South of Ryhope - Hetton, Easington Lane	I think brownfield sites should be used, rather than Greenfield sites.		Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposal
John Stelling	01429	Military Vehicle Museum	4	2	2	2				1. Washington North Land North of Nissan		We have just received permission to develop our museum alongside the Aircraft museum and were not informed by the council of these impending changes to industrial use! Change of use to industrial from recreation and leisure as we are now investing in developing a museum at the request of Sunderland Council.	The requirement for a new employment site to the north of Nissan has been informed by a recently completed review of all land allocated for economic development and future employment requirements of the city. The Employment Land Review (ELR) recommended that there is a shortfall of strategic employment land in the Washington area. A strategic development site needs to be of a size able to accommodate new development and associated infrastructure. The review recommended the size of the site to be approximately 30-40ha. A potential site was identified in the Review in the general locality of north of Nissan. The Core Strategy Alternative Approaches consultation proposed the site on the basis that the site offers the potential for future economic development that may support the new generation of low carbon industries located close to Nissan and also the adjacent road network.
Eric Blakie	01430		2	4	1	3			Yes				No response required
Ward Hadaway (David Brocklehurst)	00089	On behalf of K&M Developments Ltd	2	1	3	4			Yes			K&M Developments strongly support approach B as it recognises the important role of Washington for new housing and employment development. It should be recognised that Washington accommodates 20% of the population of Sunderland. Each of the four approaches include a new major strategic employment site in Washington. It is considered that if that site is to be promoted for employment that it should be mirrored by a percentage of housing development to reflect the likely increase in people wishing to live and work in Washington. Whilst it is recognised that the SHLAA identifies only 6% of land available for housing over the next 15 years is located in Washington we consider that the SHLAA has not fully considered the opportunities for new housing development in Washington having discounted sites which we consider are suitable for housing. We would submit that Approaches A and D place too much reliance on new housing development in South Sunderland and acknowledging the severe delivery problems that have existed in the first years of the RSS that the Council should not seek to allocate the majority of its housing in one area, particularly when a lot of the sites will be City Centre sites where flatted and high density developments will be difficult to deliver. Approach C is considered unsuitable if the Council is considering making up a shortfall in housing provision by increasing density as that is likely to compound the existing problems where house builders are not building higher density schemes. In summary, we would support the Council following the Approach B as it provides a strong housing and employment allocation for Washington and provides a balanced and realistic approach to Sunderland North, South and Coalfield and without heavy reliance on the delivery of housing and employment within one particular part of the City	Comments noted
Louise Nicholson	00121	Cecil M Yuill Ltd	4	2	3	1			Yes		Land at Fence Houses, Chilton Moor could be a strategic regeneration site within the Coalfield Area	In option A, (Para 5.13), we would disagree with the assertion that 'there would be opportunities for improved green infrastructure in the Coalfield as a result of the reduced growth focus' as it is unclear from where the funding for such improvements would come. It is highly unlikely that public sector funding will be available at levels seen in the past 10 years; thus most of it would have to be funded through developer contributions from new developments in the area. Given the likely high cost of contributions and abnormal development costs for the city centre/brownfield sites elsewhere, it is unlikely that there will be sufficient 'left-over' to fund green infrastructure improvements in the Coalfield (or indeed elsewhere outside of central Sunderland) or the strategic Central Route Options B and D give the best of both worlds. Both allow strategic regeneration schemes to be prioritised in the central areas, whilst still allowing for sufficient growth in other deprived areas in the City to attract investment to regenerate them.	Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.
Christine Masters	00143/0472	Montagu Evans on behalf of Land Securities	1	2	3	4			No	6. Holmeside should not be the only site to be considered for new large Scale shopping facilities - there are other sites within the City Centre which are suitable for a retail extension and these should also be considered as part of the LDF process. The identification of these sites pre-judges the application of the sequential approach which should take precedence. Instead of referring to specific sites, there should be a cross-reference instead to retail policies (at least in relation to the retail elements of any application proposals which may be brought forward on these sites). Otherwise, there should be a requirement to apply sequential approach. Furthermore, and most importantly, the approach to identifying the sites fails to recognise that there may be opportunities for the components of a major regional development to be disaggregated among a series of potentially sequentially preferable sites which	The former Crowtree Leisure Centre should be recognised as a potential site for additional retail floor space and as such should be defined within the core strategy consultation document. There is no evidence in planning or commercial terms to give priority to the development of the Holmeside Triangle, particularly when so many uncertainties remain both in terms of its development and the potential that exists on other sites. The Development Framework should not be used as a tool to regulate the delivery of retail floor space, particularly when the identified retail need is significant and that there maybe more risk in not meeting the strategic objective of delivering more retail floor space in Sunderland city centre, then waiting for the particular conditions which would allow a particular site to be delivered. However, there should be a clear acknowledgement, consistent with the guidance in PPS6, than in the case of retail development, the regeneration of the sites should not outweigh the requirement that a sequential approach should be applied to the preferred location of new retail development	Holmeside should not be the only site to be considered for new large Scale shopping facilities - there are other sites within the City Centre which are suitable for a retail extension and these should also be considered as part of the LDF process. The identification of these sites pre-judges the application of the sequential approach which should take precedence. Instead of referring to specific sites, there should be a cross-reference instead to retail policies (at least in relation to the retail elements of any application proposals which may be brought forward on these sites). Otherwise, there should be a requirement to apply sequential approach. Furthermore, and most importantly, the approach to identifying the sites fails to recognise that there may be opportunities for the components of a major regional development to be disaggregated among a series of potentially sequentially preferable sites which would be more consistent with the support for desegregation in PPS6.	As both the Holmeside and the Crowtree sites fall within the defined City Centre Retail Core neither has a sequentially advantage. The Retail Needs Study highlights the opportunity afforded by the redevelopment of Crowtree in improving the retail offer of the City Centre.  The redevelopment of the Holmeside site is the Council's preferred location for new retailing in the city centre - this was established in UDP Alteration No. 2. Its identification as a Strategic Site is appropriate in the context of PPS12.

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										would be more consistent with the support for desegregation in PPS6			
Rodger Marsh	00189	Storeys:ssp	2	4	1	3						The former Crowtree Leisure Centre should be recognised as a potential site for additional retail floor space and as such should be defined within the core strategy consultation document. There is no evidence in planning or commercial terms to give priority to the development of the Holmeside Triangle, particularly when so many uncertainties remain both in terms of its development and the potential that exists on other sites. The Development Framework should not be used as a tool to regulate the delivery of retail floor space, particularly when the identified retail need is significant and that there maybe more risk in not meeting the strategic objective of delivering more retail floor space in Sunderland city centre, then waiting for the particular conditions which would allow a particular site to be delivered. However, there should be a clear acknowledgement, consistent with the guidance in PPS6, than in the case of retail development, the regeneration of the sites should not outweigh the requirement that a sequential approach should be applied to employment land in these areas where there is already a plentiful supply of such land based on the evidence of past take-up rates. As Rainton Bridge Business Park distorts the overall picture in the Coalfield area, our analysis revealed that if this was considered separately, there would have been a take-up rate of 0.49 hectares per annum, resulting in an implied supply of 59 years. On this basis, there is clearly little need for new employment allocations in this area of Sunderland and this should instead be focused in the urban area and at Washington.  Housing  Storeys:ssp support the early completion of new housing on sustainable and deliverable sites particularly suitable previously developed sites within the urban areas and close to transport nodes. This approach will assist regeneration particularly at Fence Houses which has previously been identified as a Growth Area in the Core Strategy Preferred Options. It is our view that sites within Fence Houses should be allocated to contribute toward housing supply in the next five years such as the former SIG Combibloc site particularly as several of the sites identified within years 1-10 of the SHLAA can be questioned in terms of the deliverability of some of these sites within the anticipated timeframe.	The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area  Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tyne and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area.
CBRE (Philip Neaves)	00751/0581	The University of Sunderland	1	3	2	4			Yes			In the context of the spatial approaches set out within the consultation paper, our client's preferred option is 'Core Strategy Approach A: Focus Development on the Conurbation', this principally concentrates on development and growth of the city centre/central Sunderland, with further focus on Washington and the built up area of Sunderland only. Sustainable growth in Houghton and Hetton'. Following the preferred option of Core Strategy Approach A, our client's next preferred option would be approach C, then B, with the least preferred being D. Sunderland City Centre is the commercial hub of the district, containing the main principal civic, business and cultural areas, and is the focal point of the local public transport network. Through adopting Core Strategy Approach A, this would principally concentrate development and growth of the city centre and central Sunderland which will help strengthen and develop the positive measures introduced and invested to date to make it the place it is today. This approach continues the strategy set out in the UDP Second Alteration of strengthening the role of the city centre by defining strategic locations for change.  Development on available, suitable and sustainable locations within the existing conurbation, not only complies with national and regional planning policies, it makes use of existing infrastructure, thus providing accessible locations, regenerating vacant sites and strengthening the city centre and central Sunderland. Further investment within the city centre will help generate employment opportunities, attracting more people to Sunderland and in turn will help enable further public transport improvements. Within Tyne and Wear, Sunderland is the second largest retail and commercial centre behind Newcastle, and in that respect, a stronger more diverse Sunderland is required to attract inward investment to improve competition, reducing leakage to the larger and more established centre of Newcastle.  Although our client agrees with the identified 'strategic sites' identified within the consultation document to ensure the Council's aim of regenerating the city can be achieved,  our client believes that both the University of Sunderland's campuses at St Peter's and City Centre should be included as strategic sites to the core strategy and should be considered at this stage. The adopted development plan for the City of Sunderland is the Unitary Development Plan (UDP) 1998, and the UDP Alteration No. 2 (Central Sunderland) 2007. Within the development plan, both University campuses at St Peter's Place and City Centre are designated as 'Strategic Location for Change'. St Peter's Campus is covered by Policy NA3B.1 which notes that the Council will encourage the more effective use of land for the following land uses, assembly and leisure (D2); Business B1 with no permitted change to B8); non-residential institutions (D1); ancillary retail units not exceeding 250 sq m and serving local needs (A1); ancillary to units serving the local needs of residents and local employees (A3); and, Housing (C3 – student accommodation). Unacceptable uses include general industry (B2) and warehouse and storage (B8). The City Centre campus is covered by policy SA55B.3 which states that the Council will support the growth and role of the university campus primarily for dwellings (C3 restricted to student accommodation) as ancillary uses. Both campuses are located within the city centre of Sunderland where the Council aims to maximise investment in employment, housing, leisure, tourism and education, and strengthen the retail function. Development will be resisted that has a negative impact on the viability and vitality of the city centre. These concepts within the adopted development plan very much mirror our client's vision and their support of Core Strategy Approach A. The University of Sunderland plays a pivotal role in the economy of Sunderland, with the Regional Spatial Strategy for the North East recognising the role of Universities in the transition to higher productivity, a more knowledge based economy, raising the skills base of the workforce, and improving social and cultural facilities. Both University campuses are comprehensively master planned, and currently have been progressed in advance of the wider master plan proposals for the wider locale in conjunction with the Council. The University has worked recently with Sunderland 6th Form College to obtain planning permission for a new 6th Form College on the St Peter's Campus, further strengthening the educational facilities within the city centre. During the lifespan of the LDF, St Peter's Campus and City Campus will be dynamic areas of change as illustrated by developments already undertaken, such as the Sixth Form College at St Peter's and the hub and associated buildings at the City Campus and developments under discussion through the master plans for the two campuses. In order to continue the dynamic and supportive approach adopted by the UDP Second Alteration, the University believes that it is essential to include St Peter's Campus and City Campus in the list of sites identified by the LDF as strategic sites. In Summary, it is important to concentrate development in Sunderland on currently available sites to increase productivity and help maximise investment. This will ensure Sunderland becomes a stronger centre and reduce leakage to Newcastle which currently is a more established and larger centre. In the context of the spatial approaches set out within the consultation paper, our client's preferred	University sites do not fall within the definition of Strategic Site as outlined in PPS12. The role of the University is to be emphasised in the Core Strategy both as a learning institution and as a driver in terms of the emerging Economic Masterplan (University City)
Alan Hunter	00265	English Heritage										Core Strategy – alternative spatial approaches consultation document Paragraph 3.4 of the full document sets out the draft Spatial Vision for the Core Strategy. It would be helpful if this statement captured something of the need to protect and celebrate and cherished cultural heritage of the city.  The consultation document puts forward four alternative spatial approaches to development. This is followed by an assessment of the strengths and weaknesses of each of those alternatives. Of immediate concern to me is the fact that none of the alternatives has been assessed in terms of impact upon the historic environment of the city. The reason for this, I discover, is to be found in Section 6.0 of the full document which deals with the SA and Core Strategy objective appraisal, where it is apparent that not all spatial objectives were used in the appraisal process.  Of particular interest to English Heritage is the fact that Spatial Objective 20 was not considered relevant and in consequence, the extent to which each alternative would meet, or fail to meet, Spatial Objective No. 20. To increase the contribution that urban design and valued cultural and heritage assets can make to the image of the city and the quality of life of its residents has not been assessed. Given that the matrix of strengths and weaknesses of each alternative assesses in various ways their impact on nature conservation and green space in line with Spatial Objective 7 and 17, this omission appears somewhat perverse. PPG1 (Para 17-20) accords equal weight and favour to nature conservation and conservation of historic environment.  Notwithstanding this omission we find that, Section 7.0 of the full sustainability appraisal report (the matrix in figure 8), each of the alternative spatial approaches is adjudged to have an impact in relation to SA Objective 9 Promoting, enhancing and respecting Sunderland's culture and heritage. This being the case, why were the alternative approaches not assessed in relation to Spatial Objective 20? The SEA Directive regards cultural heritage, including architectural and archaeological heritage, as a principal receptor upon which the alternative approaches might as well have significant negative effects, but there is no clear evidence to show how the sustainability appraisal process and the findings in relation to SA Objective 9 has informed the relative merits and dis-benefits of each.  Without analysing each perceived impact on each separate issue in the 'strengths and weaknesses' matrix. I note in passing that Approaches A and C are considered to have a more significant negative impact on the Green Belt in the north of the city than Approach D. Yet from the figures presented, Alternative D proposes more development (in the form of additional housing) than Approaches A or C. The relative impacts of each alternative appear to be misrepresented, leading to a concern that other such misrepresentations may exist in the analysis.  Core Strategy – alternative approaches – SA non-technical summary Section 1.4 sets out the draft spatial objectives for the Core Strategy. English Heritage is pleased to see the inclusion of Spatial Objective 20 regarding the historic environment. I am also pleased to note that, in addition other spatial objectives have cross-cutting relevance to the safeguarding and positive utilisation of the city's heritage assets.  Section 2.2 highlights the key messages to emerge from the review of relevant policies, plans, programmes, strategies, and initiatives. Falling out of this, I welcome identification of the need to ensure effective protections for all aspects of the historic environment, and the need to protect the countryside and coast for, amongst other things, the diversity of its heritage.	Comments noted. The City Council recognises the importance of the historic environment to the city and the contribution it can make to place shaping. In the absence of a plan, this will continue to be the case. The Core Strategy will continue to provide support for the protection and enhancement of the historic environment in the city.  We believe that this point is sufficiently covered in the SA framework under objective 9, point 1 - Improve the image of the city and in particular the city centre. Although, not explicit, this point covers regeneration of the city using various means, including the historic environment.  The SA has come to such diverse conclusions based on the information provided by four alternative approaches which are very strategic. A more in depth appraisal will be provided at the Revised Preferred Options stage where more policy detail and direction will be given and during the appraisal of the Allocations DPD, which will look at specific sites across the city in further detail.  Mitigation measures are only provided for the most sustainable approach under the different chapter headings and this is done for the different SA objectives. Under SA Objective 9, approach 'D' is the most sustainable as it produces a positive effect, whilst approaches A and C produce a neutral effect and approach C a significant negative effect. Mitigation has not been taken into account during the appraisal and mitigation measure are produced after the appraisal. The mitigation measures proposed, along with other non-spatial and non-land use proposals, will help protect and raise awareness of the city's historic environment. Detailed mitigation measures will be provided at the next stage (the Revised Preferred Options).

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												<p>Section 3.2 provides commentary of a number of issues which translate into Sustainability Appraisal Objective, including SA Objective 9. Whilst it provides a brief outline description of the stock of heritage assets in the city, it does not by any means cover them all; nor does it consider in any depth the extent of its condition or the dynamics of improvement or deterioration.</p> <p>Section 3.3 outlines the situation were the Core Strategy not to be undertaken. We are advised that even in this scenario character appraisals and management plans will be prepared for all existing conservation areas. We are also advised that numbers of applications for listed building consent will continue to increase as more emphasis is placed on the sustainable re-use of historic buildings and as the importance of 'sense of place' gathers momentum. As these outputs and outcomes will seemingly occur in the absence of a Core Strategy, I am at a loss to understand how the preparation of the Strategy, or indeed any of the alternative spatial approaches, would result in different, or indeed, better outcome.</p> <p>In addition to the questions asked of the Core Strategy policies set out in the Table in paragraph 4.2.1, I would add –</p> <p>- Will the policy assist in making positive utilisation of the historic environment in social and economic regeneration? - Will the policy assist in ensuring that development does not have a detrimental impact on the historic environment in all its many and varied facets, including listed buildings, conservation areas, and the city's landscape.</p> <p>Section 5 deals with Appraisal Findings. We are advised that without the Strategy there will be a minor negative impact on the heritage of the city. We are also advised that Alternatives A, B, C, and D will have neutral, major negative, neutral and minor negative impacts respectively.</p> <p>From the information gathered and presented, it is difficult to understand how such diverse conclusions have been arrived at. The commentary in Section 11.0 of the full SA report contains contradictions which do not help elucidate. If change and regeneration of any scale anywhere in the city, proceeds without proper understanding of the historic character and significance of the locality and its cultural assets, and if that change and development fails to safeguard and constructively conserve that which is important in heritage terms, it matters little which spatial alternative is ultimately decided upon as the preferred option. Development that occurs in such fashion can not be said to be truly sustainable. As a consequence, impacts are much more likely to be neutral, negative or positive depending on site and area specific considerations and approaches.</p> <p>Section 13 of the full SA report contains the conclusions. Table 13.10 sets out the summary of impacts. In relation to SA Objective 9, dealing with cultural heritage, mitigation is, it would appear, factored-in to produce a minor positive impact. Mitigation, it is suggested, could take the form of information centres or monuments to Sunderland's Industrial heritage. I fail to understand why such mitigation should, or could, only be confined to Approach D. Could it not equally apply to any alternative, thereby affecting the level and nature of its impact on the historic environment? That said, information centres and the erection of new monuments will not, of themselves, mitigate against proposals which would bring about adverse impacts upon the city's heritage assets.</p>	
Mrs A M McConnell	00896		2	1	4	3	Can you release the current number of boarded up & derelict homes in each area & the plans you have made to develop them.		No	Strategic site 8 - South Ryhope - should be considered only if deemed necessary, assuming businesses have fully invested in the other sites first.	No		Comments on boarded up properties has been forwarded to Health, Housing and Adult Services for information and response where necessary. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development.
Malcolm Graham	01433		1	4	2	3	Yes, restructure Hendon East shore, Notice County Durham massive 'competition' which borders or boundary EG Dawdon, Murton ETC		No	Sort out 5. Inner-City Vaux site, Sheepfolds, Pennywell Echo, Hendon Road, High Street East and West before you start on other areas finish before you start.	How many sites do you want? Think of Sunderland as a Business. As your business then you would probably not waste our money?		Comments noted
Nigel J Chambers	01432	Tangent Properties	1	4	3	2			Yes	(but with a caveat) Strategic Site 1: North of Nissan. Fully support the proposed allocation but disagree with the recommendation that the site is only suitable for large scale employment. The site should be defined in the same manner as Site 8: South Ryhope i.e. a business park for a range of employment uses. It should not be restricted to a narrowly defined type, scale or range of employment uses but allowed flexibility to be attractive to a full and wide range of potential occupiers in order to form an effective part of the Council's Employment Land Portfolio.	The Ryhope-Doxford link road should be included as a 'Strategic Infrastructure' sites as this is likely to be an important element in bringing forward the South Ryhope site (Strategic Site 8).		Comments noted. Points made concerning strategic sites are accepted and are being considered through appropriate wording in the Core Strategy. The Ryhope-Doxford link road is being acknowledged in the Core Strategy.
David Lock Associates (Nick Freer)	01434	on behalf of O & H Properties	1	4	4	1						<p>Spatial Approaches - In terms of preferred approach O &amp; H consider that the imperative is to maximise the potential to deliver the capacity and regeneration opportunity in Central Sunderland. To this end the preferred approach should be either Approach A or Approach D since both apportion the largest share of the additional residential requirement - 62% - to the South Sunderland Policy Area. It is a fundamental regional priority to direct investment and development to Central Sunderland and to the River Wear Corridor. This is to deliver a step change in the performance of the City as a whole and, as a result, in perception of the City which will in turn lead to its further long term regeneration. That a substantial proportion on the brownfield development opportunities are located in Central Sunderland and in South Sunderland further reinforces the priority which should be afforded to this sub-area. In terms of alternative approach the only alternative which we suggest is worthy of further consideration is the specific</p> <p>identification of a Central Area Sub-Area. The purpose of this would be that policy approach which fundamentally prioritises the central area, might be the most transparent means to ensure that the potential of the Central Area is fully realised ahead of alternative development opportunities - because of its wider benefits, the strength of the sustainability rationale, and the regional policy imperative placed upon achieving precisely this. Strategic sites - O &amp; H Properties agree that the LDF should identify strategic sites but makes no comments on those sites identified other than the former Groves Cranes site. This site is owned by O &amp; H. It is entirely appropriate that Grove Cranes is identified as a strategic site capable of accommodating at least 1000 dwellings. Detailed design may reveal some additional capacity. The site has been subject to careful examination not least through the Maintaining the Balance exercise, the Sunderland SHLAA and the Central Sunderland UDP Alteration. There is a wealth of technical assessment and policy based appraisal which provides a robust evidence to support its identification. The site has been subject to sustainability appraisal. It is a critical site in delivering the vision for Central Sunderland as a thriving location in which to live, work, and invest. It is well served by public transport and there are no fundamental constraints to development. It represents a key gateway site to the City a position reinforced when connected by the proposed bridge across the Wear.</p>	Comments noted
John Calvert	01293	Home and Communities Agency	1	4	4	2						<p>The document focuses on alternative approaches to spatial development as well as important planning principles such as sustainable development and the importance of economic prosperity.</p> <p>Ultimately the objective is that the Core Strategy will provide greater certainty to individuals and businesses when making investment decisions and submitting planning applications and help enable the local authority to make speedier decisions.</p> <p>We welcome the increase in certainty that progress with the Core Strategy will provide in taking forward our single conversation and subsequent local investment agreement.</p> <p>Spatial Approaches :</p> <p>The Regional Spatial Strategy for the North East directs priority for the focus of regeneration on the River Wear Corridor and seeks to maintain the broad extent of green belt to prevent the merging of conurbations along with the need to deliver 14,960 additional dwellings over the plan period and make available 225 Ha of land for general employment use.</p> <p>The four alternative approaches seek to deliver RSS requirements in the context of sustainability. Within these requirements and constraints the range of available approaches are somewhat constrained and this is reflected in the alternative approaches subject to consultation.</p> <p>The HCA broadly support the approach outlined in option A, but note the potential reduced environmental impact of option D.</p> <p>Our primary concern is the delivery of the required housing numbers and regeneration of the existing city and town centres.</p> <p>We will be focusing on the early delivery of development of the former Cherry Knowle Hospital site and will be seeking to bring this forward during the immediate plan period.</p> <p>Strategic Sites :</p> <p>The HCA support the strategic sites as identified in the consultation document.</p> <p>Delivery of a broad range of employment, educational facilities and services, well related and accessible to both existing and future residential areas will be key to moving towards mutual sustainable community objectives.</p> <p>Summary of Response to Consultation</p> <p>The Homes and Communities Agency looks forward to progress and publication of the Core Strategy and Allocations DPD's along with the underpinning evidence base.</p> <p>The certainty provided by these documents will be key in directing the agencies future investment decisions through the single conversation process in support of implementation of the plan and place based priorities.</p>	Comments noted
Barton Wilmore (Marie Jasper)	01435	on behalf of Aurora Property Developments									Deptford Terrace site for one or more of the following uses - Offices - Residential	The Deptford Terrace site is located adjacent to the River Wear and is occupied by large industrial buildings. These buildings were originally built for use as a glassworks and galvanising works in the 1960s. The original buildings remain on site today, but are no longer required for their original purpose.	Site does not fall within definition of Strategic Site as outlined in PPS12. A wide range of uses is proposed which makes it difficult to argue that development is central to the achievement of the Core Strategy

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											<ul style="list-style-type: none"> <li>- Hotel and Conference Centre</li> <li>- Car Showroom</li> <li>- Educational Institution</li> <li>- Supporting Retail</li> <li>- Supporting Leisure</li> </ul>	<p>We consider that this significant brownfield site provides an opportunity for comprehensive redevelopment in a key gateway location, along the Wear riverbank and close to Sunderland City Centre, akin to several of the "Strategic site" in the Core Strategy.</p> <p>This approach is consistent with Policies 9 and 13 of the North East Regional Spatial Strategy which seek to promote regeneration along the River Wear corridor and encourage the regeneration of brownfield locations in Central Sunderland. Additionally the suggested approach is consistent with the following key development requirements contained in the Regional Spatial Strategy (and replicated in Core Strategy Alternative Approaches document):</p> <ul style="list-style-type: none"> <li>- Giving priority to the regeneration of the River Wear Corridor in Central Sunderland</li> <li>- To provide for some 225 hectares General Employment Land Allocation</li> <li>- To deliver 14,960 net additional dwellings as a minimum for the RSS period 2004-2021.</li> </ul> <p>In relation to the route of the Sunderland Strategic Transport Corridor, consideration should be given to whether the current safeguard route is the most appropriate alignment. We consider that there are alternative alignments which would allow redevelopment along the River Wear corridor to take full advantage of the riverside location; are more cost effective; and will assist in the redevelopment of additional strategic sites.</p>	
Nathaniel Litchfield (Lynda Stevenson)	00072	on behalf of Washington Developments Ltd	4	1	4	1					<p>Approach to Residential Developments</p> <p>We have considered the main messages listed under paragraph 3.5 of the Alternative Approaches paper and are supportive of these messages, particularly the need to provide new housing in attractive and accessible locations that are of the right type, tenure and price. Paragraph 3.8 takes into account the results of the Strategic Housing Market Assessment (SHMA) (December 2008) which indicates demand for more bungalows and 3+ bedroom, detached and semi-detached houses to reflect the aspirations of higher-income and economically active households. We fully support the recognition within the Core Strategy for large house types to meet identified needs.</p> <p>Density of Development</p> <p>We recognise the importance of applying higher density housing standards in suitable locations in order to make more efficient use of land. We recognise that paragraph 3.8 states that:</p> <p>"Any approach to increase development density will be very limited in its scope; otherwise it could result in detrimental impacts on the city's housing mix and residents' quality of life." We consider it is important the Core Strategy recognises that in some circumstances it could be appropriate to decrease densities to provide low density, high value housing. This approach accords with Strategy Policy 5 of the Council's Interim Strategy for Housing Land (February 2006) and Policy 29.3.c of the Regional Spatial Strategy (July 2008).</p> <p>Alternative Approaches</p> <p>The Alternative Approaches paper considers four approaches to strategic development which comprise the following:</p> <ul style="list-style-type: none"> <li>• Approach A = Focusing development upon the conurbation;</li> <li>• Approach B = Proportional distribution of development;</li> <li>• Approach C = Focus development within the current urban area; and</li> <li>• Approach D = Sub-area spatial requirements.</li> </ul> <p>We recognise the importance of regenerating and revitalising the city centre and central Sunderland, however, we do not consider that this should be "Limiting development in the Coalfield would constrain investment leading to the economically active residents leaving the area in search of work and a better quality of life. Areas of deprivation in the Coalfield may worsen without additional employment and housing investment". Additionally, it is noted under paragraph 5.15 that local facilities / services in the Coalfield may decline further without a boost to the local population and that potential population decline would further affect public transport viability.</p> <p>Approach A only provides for 14% of new housing within the Coalfield sub-area compared to 20% under Approaches B and D and 19% under Approach C. The Local Development Framework Topic Paper 1.4: Housing (September 2009) advises that the Coalfield sub-area accommodates approximately 17% of the city's current total housing stock and houses around 17% of the city's population (Para. 9.35). The Topic Paper continues by advising that the Coalfield Area Regeneration Framework has the potential to accommodate around 23% of the city's housing requirements until 2024 (page 61), whilst the Interim Strategy for Housing Land advises that the Coalfield will provide some 19% of new housing in the City (Para. 9.37). Overall, the Coalfield area is recognised as being a deprived area, with regeneration being key aim.</p> <p>Furthermore, the SHMA recognises that there is a mismatch between the supply of housing and aspirations. It identifies a particular need for larger family, detached and executive type dwellings. Importantly, delivering additional housing in the Coalfield sub-area would enable the delivery of more lower density, higher value properties, which is important in decreasing out-migration and for economic growth, as recognised within the SHMA (Para. 6.49 and 6.50). Additionally, increasing the amount of housing with the Coalfield sub-area would help regeneration, the retention of local services and would support improved transport infrastructure.</p> <p>Overall, we support the level of new housing proposed under Approaches B, C and D, which reflects the amount provided for within the Interim Strategy for Housing Land. We consider that Approach A would have a harmful impact on the continued regeneration of the Coalfield sub-zone through failing to deliver sufficient housing.</p> <p>Brownfield Versus Greenfield Sites</p> <p>Approach C concentrates development on the existing urban area and on suitable previously developed land, retaining open space and countryside. Paragraph 5.26 advises that this approach would restrict development to brownfield land, whilst paragraph 5.30 advises that to meet the RSS targets there could be a requirement for a limited number of incursions into the urban fringe (subject to strict criteria), as well as four significant Greenfield urban extensions. This option also calls for increased housing densities on brownfield sites in order to meet any shortfall against the RSS housing targets.</p> <p>We recognise the importance of focusing development on brownfield sites. However, neither PPS3 nor PPS7 restricts development on Greenfield land. Rather PPS3 priorities development on previously developed sites (Para. 36). Indeed, the Interim Strategy for Housing Land states: "Good locations for very high value housing (Council Tax Bands G/H) are in short supply and it is expected that this type of dwelling, of strategic importance to the City, will largely have to be accommodated on 'Greenfield' land" (Para. 4.19).</p> <p>Additionally, Strategic Policy 4 of the Interim Strategy for Housing Land supports housing development on Greenfield land, subject to a sequential approach and sustainability assessment, with particular weight being given to applications which meet its strategic requirements for area regeneration or for the provision of high value housing.</p> <p>We consider that the approach to the release of Greenfield sites within Approach C could be too restrictive. We trust that flexibility will be incorporated into the emerging policy of the Core Strategy to ensure that provision is made for the release of Greenfield sites for regeneration purposes or to provide lower density, high value / executive style housing. Without this there is a risk that an unnecessary constraint would be put on delivering a local and regional policy objective to deliver more, better quality housing. Achieving the objectives requires supportive strategic and site specific planning policies.</p> <p>Conclusions</p> <p>Overall our we consider it is important that sufficient provision is made for housing within the Coalfield sub-zone to ensure its continued regeneration and that provision is made for low density, high value / executive style housing. We have concerns that Approach A will prejudice the Coalfield area's regeneration and that Approaches A and C will not be sufficiently flexible to enable the delivery of high value / executive style housing on Greenfield sites. We support Approaches B and D in respect of the amount of new housing proposed within the Coalfield sub-zone.</p>	<p>Comments have been noted. Policy 9 of the published Regional Spatial Strategy emphasises that the River Wear Corridor in Central Sunderland should be a regeneration priority. The Policy states that the regeneration of the Coalfield can only be for "sustainable" growth which does not impact on other regeneration initiatives within the Tynes and Wear conurbation. In these circumstances the development of a strategic site in the Coalfield would not be appropriate as it would be likely to adversely affect ongoing Council efforts to regenerate the Central Sunderland area. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production. Reference to the Strategic Housing Market Assessment has been given but it must be balanced with availability.</p>	
Claire Rogers	01269	GENECON									<p>CORE STRATEGY KEY PRINCIPLES</p> <p>The core strategy sets out six key principles. We believe, that whilst these are sound starting points these could be aligned more with the emerging key aims from the EMP, to make the core strategy more specific to the key needs of Sunderland and the focus for activity and spatial planning which the EMP advocates. This raises the question of the role of the EMP in relation to the Core Strategy. We recommend that a key principle of the Core Strategy should be to deliver the EMP in much the same way that ' Delivering the Sunderland Strategy' is key. Other comments on the principles are set out below:</p> <p>CORE STRATEGY PRINCIPLES EMP LINKAGE</p> <p>Adhering to national and regional planning policies Planning policies are likely to be aligned to the national Low Carbon Strategy too and it may be prudent to start to reflect this in the Core Strategy.</p> <p>Delivering the Sunderland Strategy Should be supplemented with reference to delivering the EMP too</p> <p>Strengthening City Centre and central Sunderland This fits well with two of the EMP aims:</p> <ul style="list-style-type: none"> <li>• New kind of University City</li> <li>• Connected Waterfront City Centre</li> </ul> <p>Focusing development within accessible locations This fits well with the EMP spatial concepts of</p> <ul style="list-style-type: none"> <li>• Low Carbon City villages as hubs for enterprise, living and economic regenerations and</li> <li>• the green network that will link them together and to the city centre</li> </ul> <p>Delivering the development of strategic sites We have a concern that this principle leads to development for developments sake and potentially oversupply, which may compromise the other key principles. Strategic sites should surely support and deliver the other principles of the core strategy not be a key principle in themselves. We set out more on this later.</p> <p>Supporting the regeneration of deprived communities Again this fits well with the Low Carbon City Village concept</p> <p>In addition to these points, to make the documents better align it may be that the Core Strategy principles could be made more specific to the emerging principles that are coming through from both documents namely:</p> <ul style="list-style-type: none"> <li>• The importance of the Low Carbon Economic Area status.</li> <li>• The waterfront green infrastructure approach.</li> <li>• The low carbon movement infrastructure, and, in addition to these internal connections. .</li> <li>• The importance of connecting Sunderland externally.</li> </ul> <p>This city centric approach should fit well with the EMP Spatial phasing, but this approach also includes two new 11-15 year housing allocations to the north of Washington, and major strategic employment sites North of Nissan and South Ryhope. All these appear to be in greenbelt and could soak up market demand instead of focusing development on more sustainable locations. However if more detailed research indicates that the employment allocation north of Nissan is needed to deliver the LCEA techno pole hub then this would be desirable but our initial consideration of this is that more space is not required. Similarly provided the South Ryhope employment allocation was proposed for the 11-15 year timeframe then this too may be desirable but only if the more sustainable urban sites have been delivered. On a minor note it is not clear to the reader what or where 'Central Sunderland' is.</p>	<p>Comments noted. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham.</p> <p>Other comments raised are of more relevance to the revised Core Strategy Preferred Options document as a whole, in terms of the relationship with the emerging concepts of the Economic Master Plan and will be introduced/acknowledged as appropriate.</p>	

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												<p>APPROACH B</p> <p>This approach fits least well with the EMP as it spreads development across all four sub areas and includes more greenbelt/Greenfield housing and employment sites, which, as set out above could affect the delivery of the techno pole hub, city centric and city village focus of the EMP spatial concepts.</p> <p>APPROACH C and D</p> <p>Both approaches fit well with the EMP apart from the inclusion of the North Nissan and South Ryhope employment sites for the reasons mentioned above. Ideally these approaches would be blended to best fit the EMP by including 'additional new employment sites' in Washington, Coalfield and South Sunderland, to support the City Village and Charge Point Commercial Zones, and to keep the focus on sustainable locations for development.</p> <p>STRATEGIC SITES AND INFRASTRUCTURE</p> <p>The phasing of the strategic sites needs careful articulation and in some cases we have concerns over the need for sites and infrastructure in the first place.</p> <p>The strategic aims and spatial phasing of EMP advocates a phased approach which the core strategy should generally be aligned with. In Summary</p> <ul style="list-style-type: none"> <li>• A city centre focused approach to help deliver the New Kind of University City and the Connected Northern Waterfront City EMP aims.</li> <li>• The LCEA City Villages, Charge point commercial zones and Techno pole Hubs are generally focused on existing sites and communities and are started in the short term, grown in the medium term and then fully rolled out and sustained in the long term. These are strategic concepts that should somehow be embedded in the Core Strategy.</li> <li>• The Green Waterfront Infrastructure concept would generally be rolled out in the short and medium term and we would recommend that it should be embedded in the Core Strategy, rather than being seen as a detail or periphery initiative. This also includes the concept of low carbon travel infrastructure that connects the City Villages, employment areas, and Techno poles together, and then connects to the City Centre via sustainable low carbon modes such as bus, walking and cycling. We would recommend that this be embedded in the Core Strategy. We are not aware of the key driver for the new Central Route road in the Coalfields area and would question its strategic need given the current Core Strategy and EMP.</li> <li>• Whilst we agree with the safeguarding of the Leamside Line we would also recommend that the Core Strategy should reflect the need for regional, national and international connectivity via use of the Leamside line as a link to Tyne Port and via express upgrade of the Metro and main line link to Newcastle and the Airport which the EMP advocates.</li> <li>• The Central Route is not defined. The route should follow existing road networks through existing conurbations within the Coalfield area (with appropriate route enhancements to upgrade the network) and focus on promoting a modal shift towards public transport (through P&amp;R sites linked to bus corridors, Leamside Line re-energization, Metro extension. Regeneration along the Central Route should be focused on sites connected to the existing road networks (or at points along proposed Metro/Leamside routes) – i.e. no remote sites requiring expansion of road networks through green belts/open spaces. This also aligns with our EMP linkage of Low Carbon City villages contained in the table opposite the 4th Core Strategy principle.</li> </ul> <p>As set out previously we have concerns over the North Nissan and South Ryhope Strategic employment sites allocations.</p>	
Helen Campbell	00818	Sunderland ARC	2	4	3	1					Sunnieside - Sunderland Retail Park (Monkwearmouth)	<p>INTRODUCTION</p> <p>Sunderland arc welcomes this opportunity to comment on 'Alternative Approaches' for the city's emerging LDF Core Strategy. This document sets out, in a consolidated form, Sunderland arc's detailed responses to the consultation on 'Alternative Approaches'. It supports the responses that have been made via the online questionnaire.</p> <p>There has already been consultation on two previous stages of preparing the Core Strategy</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> An Issues and Options consultation was carried out in late 2005/2006.</li> <li><input type="checkbox"/> An Preferred Options Report was published in December 2007 and consultation took place in early 2008</li> </ul> <p>Sunderland arc responded to both of these consultations. The arc's response to the previous Preferred Options stage (February 2008) remain robust and have therefore formed and important basis for responding to the current consultation on Alternative Approaches.</p> <p>CORE STRATEGY – ALTERNATIVE APPROACHES: OVERVIEW</p> <p>Key Policy Objectives for Sunderland arc</p> <p>In commenting on the 'Preferred Options' in 2008, Sunderland arc expressed support for the preferred option of a policy that promotes sustainable growth in the most accessible locations and focuses upon previously developed land.</p> <p>Sunderland arc particularly supported the policy objectives of</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Concentrating new development in Central Sunderland</li> <li><input type="checkbox"/> Maximising urban growth so as to take advantage of and support key transport corridors notably the SSTC</li> <li><input type="checkbox"/> Giving priority to reusing suitable and sustainable PDL</li> <li><input type="checkbox"/> Building a vibrant office employment function in the city centre</li> <li><input type="checkbox"/> Supporting the role of the city centre for retailing leisure and cultural facilities</li> <li><input type="checkbox"/> Encouraging people to live in the city centre</li> <li><input type="checkbox"/> Enabling the regeneration of key areas of the city through Development Frameworks, master plans, ECT.</li> <li><input type="checkbox"/> Protecting important built and natural assets, including the Green Belt and open countryside</li> </ul> <p>These objectives, which are closely aligned to the arc's Business Plan, remain at the heart of Sunderland arc's responses to the consultation on Alternative Approaches.</p> <p>Overall Comments on the Spatial Approaches</p> <p>In overall terms, it is felt that there is an element of artificiality in certain of the Approaches, which is not assisted by the short descriptions of some of them: for example A and C are headlined as concentrating development on the conurbation / city centre / existing urban area, but are then seen to result in potential incursions into the Green Belt north of Sunderland / Washington, which is clearly perverse. Such incursions would moreover be in direct contravention to the RSS and to this extent aspects of these approaches are considered somewhat unrealistic.</p> <p>Essentially the approaches need to be regarded simply as hypothetical frameworks for testing scenarios, but it is not at all clear as to how far this exercise has really advanced the task of preparing the Core Strategy. What it does demonstrate - although this is implicit rather than explicit from the Council's analysis - is the demanding scale of the RSS housing provisions (particularly bearing in mind that these are not ceilings) and the challenges involved.</p> <p>Although at first sight Core Strategy Approach A ('Focus development on the conurbation') would seem to best encapsulate arc's priorities, in fact it would involve some longer term incursions into the Green Belt as does Approach C. Approach D ('Sub-area spatial requirements') appears to give the best overall fit with arc's Business Plan. At the same time it is considered that this Approach carries with it some dangers of 'drift' into an over-reliance on lower density suburban development and this needs to be avoided in developing the 'Preferred Option' during the next stage of work on the Core Strategy.</p> <p>There is now a distinct possibility that more land may be allocated by the LDF than is actually required – notably for housing, given the ongoing underperformance of the housing market in the early years of the RSS plan period, which is likely to prove extremely difficult to retrieve. Phasing of sites will therefore be of critical importance and in this context (as suggested in arc's response to the consultation on the 'Preferred Options' report) Sunderland arc will be looking for specific provisions in the Core Strategy to:</p> <p>Approach A – Focus development on the conurbation</p> <p>Summary</p> <p>This Approach principally concentrates development and growth on the city centre / Central Sunderland, with a further focus on Washington and the main built-up areas of the town of Sunderland. There would be limited further development only, in Houghton and Hetton, reflecting the RSS position that Houghton and Hetton are not regarded as part of the 'conurbation'.</p> <p>Comment</p> <p>On the face of it, this Approach would appear to offer the best fit with Sunderland arc's Business Plan and with previously expressed policy preferences. However, the title and summary description of the approach belie the fact that it would involve some longer term housing development in peripheral locations, including incursions into the Green Belt around Washington and north of Sunderland.</p> <p>Approach B – Proportional distribution of development</p> <p>Summary</p> <p>Approach B would provide a [balanced] proportion of development across the four sub-areas, broadly reflecting the distribution of existing population and land area, with some additional development weighting on the city centre and Central Sunderland.</p> <p>Comment</p> <p>Approach B would to a large extent involve a continuation of past trends, which in practice would be most unlikely to achieve a truly 'balanced' distribution of development. This approach is without any real foundation in planning terms and is arguably inconsistent with the RSS.</p> <p>Approach C – Focus development within the current urban area</p> <p>Summary</p> <p>Approach C would concentrate development within the existing urban area and on suitable previously developed land (PDL), maximising the retention of open space and countryside.</p>	Comments noted. The point made about Vaux/Farrington Row being treated as one site has been addressed. The point made re the Sunderland Strategic Transport Corridor is also being addressed. We agree with the point about developing a specific sub area chapter dealing with central sunderland within the Revised Preferred Options. Sunnyside does not fall within definition of Strategic Site as outlined in PPS12. The importance of the area is reflected in its designation as "Location for Major Development" in Core Strategy

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												<p>Comment</p> <p>The concentration in this Approach on PDL and the current urban area would capture some but not all of the arc's objectives. In particular, it is noted by the Council that there would be an uneven distribution of future employment site in the city and a likelihood of longer term development incursions into the Green Belt north of the city.</p> <p>Approach D – Sub-area spatial requirements</p> <p>Summary</p> <p>Approach D would bring together local sub-area needs and priorities to form a sustainable city-wide approach.</p> <p>Comment</p> <p>The title and summary description of this Approach belies the fact that it is essentially a hybrid option. It appears to give the best overall fit with arc's Business Plan. At the same time it is considered that this Approach carries with it some dangers of 'drift' into an over-reliance on lower density suburban development and this needs to be avoided in developing the 'Preferred Option' during the next stage of work on the Core Strategy.</p> <p>THE STRATEGIC SITES</p> <p>Strategic sites and Strategic infrastructure</p> <p>It is noted that the proposed Strategic Sites comprise eight sites and two pieces of strategic infrastructure:</p> <p>Sites</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> North of Nissan</li> <li><input type="checkbox"/> Groves</li> <li><input type="checkbox"/> Farringdon Row</li> <li><input type="checkbox"/> Stadium Village</li> <li><input type="checkbox"/> Holmeside</li> <li><input type="checkbox"/> The Port</li> <li><input type="checkbox"/> South Ryhope</li> </ul> <p>Infrastructure</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Sunderland Strategic Transport Corridor (SSTC)</li> <li><input type="checkbox"/> Central (Coalfield) Route</li> </ul> <p>Sunderland arc supports the proposed strategic sites and infrastructure and particularly welcomes the inclusion of the SSTC and the Comprehensive Development Sites within arc's optional area, subject to the following qualifications.</p> <p>North of Nissan and South Ryhope</p> <p>In line with the RSS and with previous responses to consultation on the 'Preferred Options', Sunderland arc is looking to see a much clearer differentiation between city and town centre sites for office-based employment development and the peripheral sites (South Ryhope and North of Nissan) which should be reserved for manufacturing and logistics (the requirement for this is also clearly spelt out in the Employment Land Study recently completed by Roger Tym &amp; Partners).</p> <p>The RSS EIP revealed that the great majority of significant growth sectors in the north east economy are office based and Policy 19 of the RSS (Office Employment outside City and Town Centres) is specifically designed to ensure that the majority of this growth is focused in town and city centres. At the same time, Sunderland arc also attaches great importance the city's wider role as a centre of excellence for manufacturing and notes that the emerging evidence base reflects these factors and underpins the case for an extension of employment land to be reserved for B2 / B8 uses. In order to protect and enhance the city's role as a centre for advanced manufacturing and to maintain alignment with PPS6 and RSS Policy 19, it will be particularly important for the LDF to ensure that scarce resources of land suitable for manufacturing uses are not diverted to B1 offices. Accordingly, Sunderland arc considers that greater clarity is required in defining the economic roles of the proposed South Ryhope and Nissan North employment locations and that use of the term 'business park' in relation to these locations should be avoided.</p> <p>Vaux and Farringdon Row are treated as separate strategic sites in the consultation document, but in the adopted UDP Alteration No2 (Central Sunderland) they form components of a single overarching Master Plan Strategy. Sunderland arc considers that combining the sites continues to be appropriate at the strategic level of the Core Strategy – and likely to become more so as the delivery strategy is advanced. It will also help to secure continuity with the adopted UDP Alteration No 2.</p> <p>Sunniside</p> <p>There is a strong case for the inclusion of Sunniside as a strategic site. Although Sunniside is not a single development site in the conventional sense, the Sunniside 'brand' is now well established and the area has become a major contributor to the regeneration of the city centre. It arguably has equivalence with Vaux / Farringdon Row and Holmeside in relation to the future of the city centre.</p> <p>Sunderland Retail Park (SRP) Monkwearmouth</p> <p>SRP / Monkwearmouth has emerged as a location of key importance to the future regeneration of North Sunderland. It is a prominent 'gateway' location; where there is a compelling requirement to secure comprehensive redevelopment, in order to unlock the regeneration potential of a wider area of North Sunderland. Its potential was recognised by the 'Monkwearmouth Inset' in the adopted (1998) UDP and further consideration should be given to it in the context of the LDF.</p> <p>Criteria for selection of the strategic sites</p> <p>Topic Paper 1.24 'Strategic Sites' identifies a number of criteria for the selection of strategic sites. Sunderland arc has reservations as to the applicability of criterion 5 relating to Utilities.</p> <p>Treatment of Strategic Sites in the Core Strategy</p> <p>As a general principle, in relation the SSTC and sites within Central Sunderland, Sunderland arc is looking to maximise continuity with the policy provisions in the adopted UDP Alterations No 2.</p>	
J&J Design (John Shephard)	00944/0379	Springwell Gospel Hall Trust	3	4	1	2	The Sustainability Appraisal process appears to demonstrate the preferred approach should be 'C'.		Yes		<p>The Council's strategic objectives for enhancement for the landscape character and important breaks (Policy CS11) can be supported at Springwell by means of redevelopment of the existing Gospel Hall at Peareth Hall Road.</p> <p>INTRODUCTION</p> <p>Springwell Gospel Hall Trust are a local faith organisation responsible for provision and maintenance of Places of Worship on behalf of the local congregations forming part of the worldwide Brethren's Christian Fellowship. The Trust is a charitable organisation. The replacement of the existing church erected in 1978 is now an urgent requirement of the Trust. The Trust consider that at replacement church on a larger site will need to be provided within the next 5 years in order to meet the needs of a growing congregation and in view of the inadequacy of the current hall both in terms of capacity and design. The Trust are aware of and sympathise with the Council's objective to maintain and enhance a clear 'green settlement break' between Washington and Springwell, in order to ensure and enhance the 'setting and special character' of Springwell Village. The existing church and car park lie within the narrow area of Green Belt immediately north of the A194(M) which is in a cutting at this location. 2 BACKGROUND PAPERS</p> <p>The following background papers are considered relevant:</p> <ul style="list-style-type: none"> <li>• The North East of England Plan – policies 2, 8 and 9</li> <li>• Core Strategy – Preferred Options (2007) – Policy CS11</li> <li>• Sub-Topic Paper – Washington (2009)</li> <li>• Topic Paper 1.2 Green space (2009)</li> <li>• Topic Paper 1.10 Countryside (2009)</li> <li>• Topic Paper 1.17 Community Facilities (2009)</li> </ul> <p>Appeal decision APP/G1630/A/08/2082331 dated 2 September 2009 – Secretary of State's decision letter and Inspector's Report. The following aspects are particularly relevant:</p> <ul style="list-style-type: none"> <li>• The appellant has the right to express religious belief through acts of worship, it has a growing membership and vision for future expansion.</li> <li>• He agreed that it is not for other parties to suggest how the church should organize itself and the London Plan and SPG do not suggest that planning authorities know best as to how congregational forms of worship should be catered for.</li> <li>• The Inspector noted the failure of the Appellants to engage with the LDF process and the emerging Olympic Legacy Master plan Framework. 3.THE PROPOSAL</li> </ul> <p>Springwell Gospel Hall Trust propose that the emerging Sunderland LDF Core Strategy should recognise the strategic benefits which would flow from redevelopment of the existing Gospel Hall and car park with a replacement church and car park located on the footprint of the walled garden north of Peareth Hall Farm, with an access road taken through the existing car park broadly as set out on the attached Master Plan.</p> <p>It is proposed that the existing Church is demolished and car park removed. New strategic tree planting on the existing site is proposed to enhance the setting and separation of Springwell from Washington and also enhance the setting of Peareth Hall Farm a Grade 2 listed building and the associated barn, also a Grade 2 listed building. The proposed replacement church and car park would be situated within the Green Belt but wholly contained within the mature tree belt separating Peareth Hall Farm from the open farmland, and the mature hedge line broadly parallel with the A194(M) motorway. It is acknowledged that the detailed site specific considerations are not a matter for the Sunderland LDF Core Strategy. However, it is submitted that the opportunity to enhance the critical Green Belt gap between Springwell Village and Washington is a strategic consideration which should be recognised in the 'Preferred Option' document in due course. It is submitted that there are no over-riding technical obstacles to this proposal. In particular the proposed access is at the existing gateway and has adequate visibility and separation from Donvale Road roundabout. There are no flood</p> <p>CONCLUSIONS</p> <p>We conclude that the proposals for the replacement Place of Worship and enhancement of the Green Belt gap between Springwell Village and Washington support of Sunderland City Council and have strategic significance such that they should be acknowledged in the emerging Core Strategy – Preferred Options</p>	This is a site specific development issue that will be dealt with as part of the Allocations DPD	
T.D. Seymour	00937		1	1					Yes		No		No response required

Customer Details			Spatial Approaches				Strategic Sites			Other Comments	Officer Response		
Name of Respondent	Cust Ref	Company/ Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?		
Nathaniel Litchfield (Daniel Gregg)	00072	on behalf of Terrace Hill		1		1						Approaches to Strategic Development in Sunderland Terrace Hill supports the inclusion of policy within the new Core Strategy which helps to facilitate sustainable patterns of development across Sunderland. We therefore support a mix of Strategic Approaches B and D contained within the consultation document, which seek to achieve a Proportional Distribution of Development and meet Sub-Area Spatial Requirements. By formulating a Core Strategy based on these two options, the Council will help to ensure that new development is brought forward in a manner which helps to meet local needs, and in locations which are consistent with key national and development plan policy objectives. It will obviously be important to ensure that local communities are served  by shops, services and other community facilities in easily accessible locations. This will help to ensure that the need to travel, including by private car, is reduced as far as possible, and that people benefit from a genuine choice of shopping and other local services. It will also help to create valuable local employment opportunities, and help to increase social inclusion, by enhancing the accessibility of local shops to all members of the community, including those living within deprived areas. Meeting Local Shopping Needs in order to be consistent with PPS3: Planning for Town Centres, it will be appropriate for the Core Strategy, as well as other Development Plan Documents, to provide a strategic policy framework which guides future retail and other commercial development into appropriate locations.  This is particularly important where there is a need to enhance the existing range and choice of provision and/or generate new employment to help alleviate symptoms of deprivation and increase social inclusion. In order to assist the Council in doing this, we have prepared a plan which illustrates that there are three areas in particular where there is a need to bring forward new food store developments, on sites which are both commercially viable and accessible to local communities. These areas comprise north Sunderland, Houghton-le-Spring and south-east Washington. North Sunderland  In relation to the north side of Sunderland (i.e. to the north of the River Wear and east of the A19), there is currently only a limited range and choice of convenience retail facilities conveniently accessible to local residents, including larger stores which can meet main food shopping needs. The only superstore (i.e. over 2,500 sqm net floor space) on the north side of the River Wear is the existing Morrison's facility at Seaburn. However, this store is situated on the north-eastern edge of the urban area, and does not offer any significant potential to serve the areas of deficiency. Even if the current proposals for a new Tesco store on the Sunderland Retail Park site are approved and implemented, there would still be an important need to enhance the range and choice of facilities available to residents. This is particularly the case in respect of the Castletown, Hylton Castle, Hylton Red House and Town End Farm areas, where the only stores of any significance are Aldi and Netto supermarkets. The absence of any significant opportunities within or on the edge of existing centres in this area, which we are aware of, also highlights the need to consider the locations where such need is greatest. In addition to the above, within this area, ten Lower Super Output Areas (LSOAs) are within the top 10% most deprived in the country, and twenty LSOAs are within the 20% most deprived, based on the Indices of Multiple Deprivation provided by the Department of Communities and Local Government (2007). New food store development which is located at the heart of these areas would make a significant contribution towards alleviating the symptoms of deprivation, particularly in terms of providing new jobs and enhancing access to local food shopping. Houghton-le-Spring The existing range and choice of food store provision in Houghton-le-Spring is also limited, and there are no stores over 2,500 sqm net in particular. As with north Sunderland, there is considered to be an important need for the Core Strategy to guide new food store development into this area, in order to better meet main food shopping needs in this area.  The development of a large new store in this area would also help to reduce the need to travel, including by private car, to large superstores further a field, such as those in Sunderland itself and Washington. In doing so, it would make a significant contribution towards creating more sustainable patterns of development, as well as contributing towards the ongoing regeneration of the former coalfield areas. Washington  In Washington, there is a need to enhance the availability of shopping facilities, including main food stores, to people living on the south-east side of the town. There is also a need to enhance the range and choice of main food stores generally in the town, which is currently limited to the existing Asda and Sainsbury's stores in/on the edge of the town centre. As with north Sunderland and Houghton-le-Spring, it will be important for the Core Strategy to provide a framework to bring forward new development on sites which help to resolve these deficiencies. Land at Teal Farm is well positioned to meet the local shopping and service needs of existing and any planned new residential areas on the south-east side of Washington. This site already benefits from a previously granted planning permission for a new local centre. However, taking into account the need to enhance provision in the surrounding area,  and enhance choice for residents across Washington more widely, it is proposed that it should be designated for a new district centre, including an anchor food store, through the Local Development Framework process. The provision of new district centre facilities would not only enhance the availability of shops and services to the immediate surrounding areas, but it would also provide more range and choice to complement the existing Asda and Sainsbury's stores.	Consultation response highlights two areas of possible retail need: North Sunderland Estates and south east Washington: North Sunderland - the Council's Retail Needs Assessment identifies a general qualitative need in this area - this will be further investigated and appropriate site(s) identified in the forthcoming Allocations DPD. The decision on the proposed Tesco store at Sunderland Retail Park (as yet undetermined) will significantly affect retailing patterns in this area and will need to be taken into account. South east Washington - no additional need in this area is identified in the Council's Retail Needs Assessment. Any subsequent applications for retail uses in these areas will be assessed in the context of PPS4.
Wendy Hetherington & Tom Warburton	00276	One North East	1									As you are aware One North East is responsible for the development, delivery and review of the Regional Economic Strategy (RES) on behalf of North East England. The RES sets out how greater and sustainable prosperity will be delivered to all of the people of the North East over the period to 2016. In commenting on this stage of the Core Strategy, the Agency has considered the document in the context of the RES and our comments are set out below.  One North East commented on the Council's Draft Core Strategy document at its Preferred Options consultation stage in February 2008. Since that time it is noted that The North East of England Plan: Regional Spatial Strategy to 2021 (RSS) (adopted July 2008) and The Sunderland Strategy 2008-2025 (published 2008) have emerged and form the important policy framework to inform the Council's Core Strategy process. This latest consultation outlines four approaches to the Core Strategy DPD. The Agency recognises that these approaches have been created in the context of the regional policies of the RSS and the sustainable community strategy set out in The Sunderland Strategy. Four distinct areas of Sunderland have been defined in the document namely: North Sunderland, South Sunderland, Washington and Coalfield areas. The four options offered by the consultation document seek to address the issues of new development distribution across the city in terms of housing, employment and the environment. The Agency believes it is vital to prioritise support for the accelerated economic growth of the region  and maintains that it is necessary to focus actions and interventions in those areas of greatest opportunity, particularly the Tyne and Wear and the Tees Valley city regions. To achieve this objective, we believe that it is essential that local authority development plans complement the wider development of the city region economic area and this view is consistent with the view of government as set out in the review of sub-national economic development and regeneration. It is only through this approach that the future economic prosperity and well-being of the whole of the region can be secured. In the northern context, this approach has been most recently evidenced in the Northern Way study, the Northern Connection , which reviews the comparative performance of northern places and highlights the need for further enhancement of connectivity to enhance agglomeration within city-regions, to increase support for innovation and the development of knowledge based services and to find ways to boost spill-over to the areas surrounding the urban centres. Sunderland has been identified as one of the areas that is key to the Region's economic development over the next ten years.  Although there are elements in all of the four Approaches which have merit, the Agency considers Core Strategy Approach A to be the most appropriate. Approach A would focus development upon the conurbation concentrating development and growth in the City Centre and Central Sunderland. Washington and the main built up area of Sunderland would also be identified for development and growth with sustainable growth in Houghton-le-Spring and Hetton-le-Hole. Clearly this focus on the City Centre and Central Sunderland accords with the regional policy emphasis (in both RSS and RES contexts) on regeneration and revitalisation of the city centre and central Sunderland area.  The Agency has also considered the distribution of housing, employment and the environment generally and aside from the individual approaches being offered:  Housing: The Agency notes that the Council is currently reviewing its Strategic Housing Land Availability Assessment (SHLAA) to determine the potential availability and deliverability of suitable sites for housing development over the next 15 years. Publication of the SHLAA findings is scheduled for March 2010 following the appropriate consultation with stakeholders.  Clearly it will be important for the Council, in preparing its housing policy, to draw on robust SHLAA and SHMA evidence. It is considered that, in this respect none of the suggested approaches can be demonstrated as robust in housing issues terms at this time without this evidence.  There is also a concern that planning policy based on geographic sub-areas (e.g. Sunderland North and Sunderland South) may not represent natural spatial planning 'units' but rather represent variable areas which encompass a range of different characteristics within them as well as similarities. Rather the approach should be one of typology which recognises the range of different neighbourhoods and challenges of those neighbourhoods (e.g city centre, historic terraced inner neighbourhoods, interwar council housing, urban extensions). Such an approach is consistent with PPS3 and Northern Way. The approach is already used in part of the area defined as 'coalfields'. The Agency considers Approaches 2, 3 and 4 as outlined in the document to be unworkable if they are to achieve the objectives of the RSS and, as a consequence, they will not deliver on Regional Housing ambitions.  These approaches do not deliver sufficient net new units nor do they distribute housing investment in a way that aligns new build with renewal and regeneration of existing neighbourhoods.  Employment: The Agency notes the document's reference to the recently completed Employment Land Review and Sunderland Retail Needs Study. Clearly this recently gathered evidence will be important to inform the Core Strategy process as it goes forward to the Preferred Options stage.  The options for the Core Strategy should also draw on evidence currently being gathered to inform the Council's Economic Master plan. The Master plan, for which One North East has provided funding and which is currently being prepared, will develop an integrated urban economic strategy and spatial framework for Sunderland, detailing the sites and development opportunities within the City. By setting these within a realistic, prioritised plan of activity, the Master plan should ensure that the physical regeneration of the City makes the maximum possible contribution to the City's economic development.  By fusing economic and spatial strategy together, the Economic Master plan will create an influential strategic document, a powerful development tool and a marketing/promotional tool for the city. It is important to note that the Economic Master plan will look beyond the existing priority sites within the City to attempt to identify future sites to further the City's development and provide a robust evidence base in this context to inform the Council's LDF process and the emerging Regional Strategy (RS). The RES identifies the importance of the role of digital technology, media, ICT and software as critical in achieving structural change in the Region. The Software City in Sunderland has been identified as a forming physical hub for taking this element forward. This element should be recognised within the Core Strategy as a key sector in the future development of the City.  Environment: The document does not emphasise the Council's intentions to create an improved image and quality of place particularly in the context of its coastline	Comments noted but by way of clarification the Strategic Housing Land Availability Assessment and the Strategic Housing Market Assessment are complete and were used.  The fusing of the Revised Preferred Option with the Economic Master Plan and the Regional Spatial Strategy is being done. The Revised Preferred Option has and will draw on the emerging Economic Master Plan. The Alternative Options consultation can only go so far in what it can cover whilst the Seafrost Regeneration Strategy will be given due reference within the Revised Preferred Options. It is not part of the consultation, but is an important matter and will be picked up in the Revised Preferred Options.  Many of the issues raised in the representation are of a detailed nature that were not directly relevant to the purpose of this consultation, however they are of strategic relevance and will be covered within the Core Strategy and Sub Areas. The number of Strategic Sites has been reduced from 10 to 3 - Vaux, Holmeside and North of Nissan. Sunnside does not fall within definition of Strategic Site as outlined in PPS12. Importance of area is reflected in its designation as "Location for Major Development" in Core Strategy  We have since added a 5 <sup>th</sup> sub area, which incorporates the Central Sunderland area, covering land on the north and south of the River Wear. This area includes the city centre and distinctive riverside employment areas. We have resisted a more neighbourhood approach across the rest of the city because it is our view that spatial planning would be compromised. It would also prove more difficult to address strategic infrastructure. We are trying to examine sub-areas on a multi-functional basis, and while your approach works very well in relation to housing, for example, it may prove difficult to identify where adjacent employment areas would fit and relate to in terms of neighbourhoods.  It is our view that the remaining 4 sub-areas also have distinct and similar characteristics, as well as geographical and physical separation. Washington has been developed as a New Town, unlike the rest of the city. One of the key problems in this area is that it is physically separated from the rest of Sunderland in terms of public transport. The Coalfield area consists of a collection of linear, former mining villages and towns, and residents have a distinct sense of belonging to County Durham. The South Sunderland area has no significant district centres and all routes lead towards the city centre. The physical separation of the River Wear to North Sunderland is significant.  Approach 4 identifies 'sustainable growth' for the Coalfield and it is our view that the level of development proposed in this area is appropriate to the RSS. The restriction on growth in the Coalfield in Approach 1 would limit our ability to support and reach regional housing ambitions more than Approach 4.



Customer Details			Spatial Approachs				Strategic Sites			Other Comments	Officer Response																			
Name of Respondent	Cust Ref	Company/Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?																			
											<p>The Agency recognises that providing a clean, secure and stable energy supply is presently a key challenge and a key opportunity for the region's economy. Efficient use of low carbon energy is the key policy driver that the Agency is promoting through its plans and programmes, such as the Energy Pillar and Connectors and the RES Action Plan, to support businesses and other users to reduce the impacts of a presently volatile energy market and grasp the economic opportunities it represents. The UK Renewable Energy Strategy released in July 2009, stated challenging targets for the UK to rapidly increase its deployment of technologies. The confirmed aim is to achieve 15% of all energy generation from renewable sources by 2020, which will require a seven-fold increase on current levels.</p> <p>The North East region was at the heart of the first industrial revolution based around coal and other fossil fuels. We are now ideally placed to lead a new low carbon revolution with our skills, expertise and innovative capabilities.</p> <p>The economic downturn has emphasised the importance of developing a low carbon economy which is based upon sustainable technologies, energy generation and distribution methods. The energy sector is one of very few which are certain to grow over the next decade. Both the UK Government and Europe have set challenging and ambitious targets related to climate change. Sunderland is one of the three local authorities designated within the North East Low Carbon Economic Area for Ultra Low Carbon Vehicles. Much of the investment associated with this designation will influence new opportunities around the Nissan site in Washington (e.g. National R&amp;D Centre for Low Carbon Vehicles). Whilst the document makes reference to the emergence of Sunderland as part of the sub-regional Low Carbon Economic Area, the importance and opportunities arising from this designation should be applied throughout the Core Strategy.</p> <p>It should also be noted that, as part of the Covenant of Mayors Agreement, each local authority in the region has signed up to produce a sustainable Energy Action plan by February 2010.</p> <p>This will identify areas in which they are going to achieve a 20% or greater reduction in CO2 emissions from within their areas by 2020. It is likely that much of the focus will be on making savings from buildings (housing stock, public sector buildings and commercial buildings). The Energy Action Plan should inform the Core Strategy process.</p> <p>The emphasis on city regions has been mentioned earlier with focus on the Tyne and Wear and Tees Valley areas for most of the North East's economic growth. Consequently, Sunderland has been identified as one of the areas key to the Region's economic development over the next ten years. The RES specifically notes that schemes, including the Sunderland arc sites (e.g. former Vaux site and Sunnyside Quarter), the University together with sites around the Stadium of Light, Holmeside and Farringdon Row, offer key opportunities.</p> <p>As you are aware One North East is a key partner of Sunderland arc. Together with the HCA, One North East is the principal public sector funding body, underpinning the delivery of the Sunderland arc Business Plan. The Sunderland arc will continue to focus on the need to provide the physical infrastructure necessary to attract and support businesses, attracting and retaining highly skilled, creative individuals, connecting labour markets with new areas of opportunity and developing high quality places in order to build the Region's competitive advantage. Therefore the Agency considers that it is important to ensure that this investment and work to date to deliver the Sunderland arc sites are not detrimentally impacted on by the Core Strategy. It is considered that the focus of future development should continue to promote the regeneration of the City Centre and River Wear corridor.</p> <p>To add to this argument, the city centre is recognised as the part of a city which determines its competitiveness and potential for growth. It is considered that, whilst outlying parts of Sunderland City have been successful over the past decade or so, particularly as a consequence of the Tyne and Wear Development Corporation and Enterprise Zones, the City Centre has not realised its full potential. This imbalance must be addressed if Sunderland is to prosper. This issue has also been identified in the current Economic Master plan work.</p> <p>Whilst One North East recognises the importance of the Council identifying strategic sites which will further the Council's vision and the objectives of its Core Strategy, it is also recognised that there should be adequate justification for the inclusion of those sites in terms of ensuring a robust and 'sound' Core Strategy. There is also a danger in naming specific strategic sites in the Core Strategy since, by implication, this may preclude other sites coming forward without policy support.</p> <p>Furthermore, there may also be a successful argument for other 'strategic' sites to be included based on the criteria requirement set out in paragraph 4.3 of the document. For example Sunnyside Regeneration is a Sunderland arc Priority 1 project and, as such, is considered a crucial element in the regeneration of Central Sunderland which may qualify its inclusion as a strategic site too.</p> <p>The inclusion of the major transport infrastructure projects of Sunderland Strategic Transport Corridor and Central Route is welcomed.</p> <p>Mention has been made already regarding the RS context as the Core Strategy progresses. As you are aware, the Local Democracy, Economic Development and Construction Bill which provides the legislative framework for the changes needed to produce Regional Strategies is expected to receive Royal Assent before the end of 2009. Once adopted, the RS will replace the Regional Spatial and Economic Strategies and its focus will be on long term regional development. It offers a unique opportunity to put in place a bold, integrated Strategy to drive significantly faster sustainable economic development across the region over the next 20 years.</p> <p>Regions will have flexibility, both in the timescale for preparation of the new Strategy and in its form and content. The outcome of the RS is intended to be sustainable economic growth and it must contribute towards sustainable development.</p> <p>The Strategy is required to be underpinned by a robust and well-tested evidence base. The investment planning approach will be followed throughout the development of the Strategy, specifically through the supporting Implementation Plan that will be developed. This will go into more detail on joint investment programmes and priorities than the current Strategies. All phases of the RS will fully involve regional and local partners (including Local Authority Leaders, the RDA Board, business leaders and social, economic, and environmental partners) in order to gain a shared understanding of the trends that are likely to affect our region and to develop strategic pathways that will maximise the opportunities in these trends.</p> <p>Given the likely timescales relating to the preparation of the City Council's Core Strategy and the emerging new RS, the Agency is eager to closely engage with the Council throughout this policy making process.</p>																			
John Walker	00523	Gentoo Group		1							<p><b>INTRODUCTION</b></p> <p>Gentoo welcomes the opportunity to respond to the City Council's Local Development Framework Core Strategy consultation. The following response represents the views of Gentoo Group, which includes the following companies:</p> <ul style="list-style-type: none"> <li>Gentoo Group</li> <li>Gentoo Sunderland</li> <li>Gentoo Homes</li> <li>Gentoo Construction</li> <li>Gentoo Ventures</li> </ul> <p><b>RESPONSE</b></p> <p>The Core strategy focuses on four areas across the City. Three of these areas – North Sunderland, Washington and Coalfields are consistent with the Group's own management areas. The fourth area – South Sunderland covers two of the Group's management areas – Central and South Sunderland.</p> <p>There is a potential issue with this segmenting approach as it is not consistent with the Community Strategy and Local Area arrangements and their 6 areas across the City.</p> <p>The identification of strategic sites is helpful. In particular it highlights the City Centre as a priority area for development and makes the links with the ARC development sites. The Group has a particular interest in the Sunnyside area with a range of developments completed there. The importance of linking the City Centre to Sunnyside and the development of evening style economy in the area is central to the Group's activity in the area.</p> <p>We would assume that the LDF Core Strategy approach will take into account the emerging findings from the Economic Strategy Master plan. In particular the connections with entrepreneurialism, the enhancement of the City Centre especially in supporting the University and ensuring that sustainability is maintained will be essential elements alongside the emerging vision of developing:</p> <p>'An entrepreneurial University City at the heart of a low carbon regional economy.'</p> <p>In considering the different approaches the priority order from the Group's point of view is primarily based on the review of the next 5 years delivery from the Group's Renewal Plan. This would produce the following profile in comparison to the City wide additional housing provisions:</p> <table border="1"> <thead> <tr> <th>Approach</th> <th>North %</th> <th>Washington %</th> <th>Coalfield %</th> <th>Central %</th> <th>Total %</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>12</td> <td>12</td> <td>14</td> <td>62</td> <td>100</td> </tr> <tr> <td>B</td> <td>15</td> <td>15</td> <td>20</td> <td>50</td> <td>100</td> </tr> </tbody> </table> <p>Strengths of the spatial approach:</p> <ul style="list-style-type: none"> <li>The emphasis on revitalising the City Centre is welcomed</li> <li>The encouragement of additional hotel and retail to the City Centre is essential for the prosperity of the City</li> <li>The protection of green spaces and broad extent of the Green belt will enhance the sustainability elements of Sunderland's wider strategic approach within the economic master plan.</li> </ul> <p>Weaknesses of the spatial approach</p> <ul style="list-style-type: none"> <li>There is a concern that local retail / service centres could suffer, this would have serious impacts in terms of deprivation if service provision for example in the North Sunderland or Hetton areas were to decline.</li> <li>The concentration of housing development in peripheral areas may be difficult to deliver particularly given the short to medium term prospects for the housing market.</li> <li>Support for deprived areas is a bigger issue than location of development sites. Deprived areas can often be overlooked by new developments despite their close proximity and this is a wider issue to be picked up by the Economic Master plan.</li> <li>How will reference to RSS proposals be affected if there is a change in Government and the RSS is effectively removed?</li> <li>The pressure on green belt needs to be balanced with market conditions and the ability to develop sites economically in poorer quality sites.</li> </ul>	Approach	North %	Washington %	Coalfield %	Central %	Total %	A	12	12	14	62	100	B	15	15	20	50	100	Comments noted. Yes, the Core Strategy does take the Economic Master Plan into account. We acknowledge Hetton and North Sunderland as retail issues and these will be picked up on in the Core Strategy.
Approach	North %	Washington %	Coalfield %	Central %	Total %																									
A	12	12	14	62	100																									
B	15	15	20	50	100																									

Customer Details			Spatial Approaches				Strategic Sites			Other Comments	Officer Response			
Name of Respondent	Cust Ref	Company/Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?			
													<p>The increase in density of housing leading to the requirement of more flats must be balanced against the current lack of demand to purchase flats and apartments. Some of the proposals within ARC for development of apartments must now be balanced against the reluctance for owner occupiers to purchase them.</p> <p>Proposals for Strategic Sites</p> <p>There are significant housing elements highlighted across a number of the strategic sites. It is essential that the balance and mix of housing is considered within these strategic sites. Needs and aspiration studies identify a requirement for good quality family housing and upper end executive housing.</p> <p>There is a temptation however to factor in large numbers of apartments into these sites in order to meet volume and density targets. We would urge caution on these developments to ensure that the balance and mix of housing is in line with demand. We would also urge that there is a significant range of housing in terms of affordability and availability to mixed income groups to ensure the longer term sustainability of neighbourhoods and developments across the City.</p>	
John Lowther	01437	Sunderland Green Party											<p>The Sunderland Green Party endorses the following objectives:</p> <ul style="list-style-type: none"> <li>Sustainable economic development</li> <li>Long term planning</li> <li>Reduction of car dependency and congestion</li> <li>Reduction of poverty</li> <li>Support for local business throughout Sunderland</li> </ul> <p>Further we wish to emphasise that:</p> <ul style="list-style-type: none"> <li>Greenfield land should not be built upon unless there is no other reasonable alternative</li> <li>If Greenfield land is developed then there should be a commensurate re-assignment of land elsewhere to mitigate the negative effect</li> <li>Unused Brownfield land should not be left disused and abandoned. If no immediate use found for a site then the Council should consider temporary Green developments</li> <li>Radical improvement of public transport must be central to long term planning in the city</li> <li>Ensuring that the Metro service remains under public ownership is crucial for the long-term development of Sunderland. If the Metro system is subject to private control then the Council's ability to develop local infrastructure will be unacceptably compromised. Private sector involvement in the Metro service will be to the detriment of all the people of Sunderland, leading to service cutbacks, higher prices, and making any extension in Sunderland extremely unlikely.</li> </ul> <p>Having reviewed your plans we have a number of concerns and would appreciate a response on the following:</p> <ol style="list-style-type: none"> <li>Why did the planners not develop an approach specifically designed to minimise environmental damage and promote sustainability?</li> <li>Which public transport development options have been considered to date? The 25-year development of a city cannot be set out without reference to such matters.</li> <li>Specifically, has consideration been given to the use of park and ride schemes and the development of light rail networks such as the Metro system</li> <li>Why is it anticipated that large-scale housing development (including on Greenbelt or Greenfield land) is needed? Does Sunderland not have a declining population?</li> <li>Who will own the additional houses built as part of this plan?</li> <li>What types of housing does the Council envisage building? Please provide details.</li> <li>Do you envisage selling the housing, and if so will it be affordable for the people of Sunderland?</li> <li>Do you anticipate attracting new employers to Sunderland? If so which sectors in particular are you hoping to appeal to and how are you going about doing this?</li> <li>Do you see value in maintaining the Metro service in Sunderland?</li> <li>Do you see value in extending the Metro system in Sunderland?</li> <li>Do you support the campaign to keep the Metro under public ownership?</li> </ol>	<p>In answer to the points raised: 1. Promoting sustainability is fundamental to planning as a whole and this was an underlying theme across all approaches. 2. We have been working within the context of the Local Transport Plan, the Regional Spatial Strategy and other strategies 3. Park and Ride has been considered and dismissed for the present. The Metro system has been flagged up and the extent of the metro running westward. 4. It is anticipated that large scale housing development will be needed as it is a requirement of the Regional Spatial Strategy. Yes Sunderland previously had a problem with out migration of working age residents largely due to a lack of appropriate house types for them to move into. The net result is that these age cohort tends to commute back into Sunderland to work by unsustainable modes 5. The Core Strategy has no powers to control final ownership however viable in relation to the provision of new homes the net additional houses will be for private ownership where there is a proven need for affordable housing. 6.The Core Strategy will take on board the results of the Strategic Housing Market Asses</p> <p>Tyne and Wear conurbation and is one of the main employment centres, it is important therefore to retain a portfolio of employment land. The City Council will also seek to support the creation of a low carbon employment sector in line with the emerging master plan. 9 &amp; 10. Yes, it is an intrinsic part of the sustainable transport network for Sunderland. The extension must be bound in part by delivery e.g. funding. 11. This is not an issue for the Core Strategy.</p>
Sarah Wickerson	00267	Environment Agency											<p>We note that the SA states that all alternatives have a negative impact on flood risk. It would be useful to consider this aspect in more detail within the SA – we note that the section 3 of the SA does not compare the different alternatives with regard to flood risk. Given that the regeneration aims</p> <p>of Sunderland involve the redevelopment of key sites at flood risk, such as the Port, or on sites where contamination may preclude the use of infiltration SUDS techniques, we feel that the SA should take these issues into account, in conjunction with the outputs of the emerging revised SFRA.</p> <p>We would expect the SA to make a strong policy recommendation to mitigate against any identified negative environmental impacts of the plan. These recommendations should be clearly incorporated within the Core Strategy document itself.</p> <p>Please be aware that even broad allocations within the Core Strategy should be subject to the Sequential Test and Exception Test, which will be informed by the SFRA.</p>	<p>Comments noted. An update to the existing SFRA has now been completed and has been used to inform the emerging Revised Preferred Option and the accompanying Sustainability Appraisal.</p>
Smiths Gore (Jo Storie)	01438	on behalf of Church Commissioners				1	South of Ryhope - Agree with the site being a Strategic Site but disagree with the proposed uses, site is more appropriate for mixed-use. (employment and housing)						<p>1. Introduction This response is made on behalf of the Church Commissioners for England who are the owners of significant areas of land to the south of Ryhope. The Commissioners are seeking the allocation of land at South and Willow Farm, Ryhope for mixed-use development (employment and housing). In addition, the Commissioners wish to express their support for Core Strategy Approach D; providing a sustainable city-wide approach to growth and development and focusing on local sub-area needs and priorities. 2. Spatial Approaches Approach D is a sub area led approach, but with a particular focus on the City Centre. The Church Commissioners agree that the regeneration</p> <p>focus should be on the City Centre however there is also a fundamental need to recognise the needs of the coalfield and other outlying areas where both employment and population levels have declined, more markedly than in other parts of Sunderland. The need, therefore, to provide for an employment focus and a new choice and type of dwellings in this area clearly outweighs the need to release greenbelt land on peripheral sites to meet a market driven demand. Approach D offers a fine balance between the City Centre needs and the wider requirements within the administrative boundaries, where alternative suitable locations can be found to better disperse demand across the Sunderland area, alleviating pressure on areas such as the greenbelt around Washington. 3. Strategic Sites The Church Commissioners support the identification of a number of strategic sites to better focus investment and welcome the use of defined criteria to establish specific and appropriate sites. The</p> <p>Commissioners' land at South and Willow Farm, South Ryhope is identified in the Core Strategy – Alternative Approaches document as one of ten strategic sites for single user, large scale employment. The Church Commissioners believe the landholding to be an important and strategically significant development site in the south of Sunderland, given its proximity to the new Southern Radial route, its location adjacent to the built up residential area of Ryhope and proximity to the proposed Cherry Knowle Hospital Development. The character of this surrounding environment is of a fine grain, low rise urban structure, set within landscape and open green space. However, the Commissioners consider that the site would be more appropriate for a carefully master planned, high quality, mixed use scheme; to include employment uses that correspond with the finer urban</p> <p>grain character of the area. New housing development would also better relate to the character and scale of the surrounding area. The Church Commissioners are keen to work in partnership with Sunderland City Council to deliver an appropriate mix of uses and agree a scale of development. The Commissioners submit that a single large structure, offering an industrial or manufacturing operation would not complement the predominantly residential character of the area. The use of the site purely for employment purposes is also inconsistent with a number of the criteria for establishing suitability of strategic sites, as set out in your Core Strategy Alternative Approaches document. Impact: the impact of a large scale, single user manufacturing or industrial use would potentially be detrimental to the surrounding environment both in terms of visual impact on such a prominent site and air quality in a residential/potential hospital environment and would detract from the attractive residential quality of the area.</p> <p>Delivery: the Commissioners do not agree that retaining a large scale 'reserve' employment site would deliver development that will directly and significantly contribute to the attainment of the City Council's objectives and priorities. Smaller employment units, master planned around a high quality residential environment would be a more suitable approach to the site. Utilities: the site is currently un-serviced by utilities and requires a level of investment to make this happen. The delivery of a phased mix of uses would serve to pump prime further investment on site. Adequate vehicular access can be obtained from the new link road into the site. Conformity: the site is not referred to in the RSS. The development of the site for a large scale single user for manufacturing or industrial uses in this location would not accord with the location strategy and development principles for the City Region. In terms of creating sustainable economic development in the region, RSS (Paragraph 3.7) supports the development of the economy in a more sustainable way including: being close to an available workforce; accessibility by public transport, cycling and walking; making optimum use of existing inf</p> <p>and promoting self sufficiency with indigenous businesses locally producing goods and services. While employment use on the site is consistent with most of this criterion, a single user would not promote self sufficiency. A series of smaller scale business units set within a mix of other uses would be more appropriate in this respect. Environment: As noted above, a large scale manufacturing use on the South Ryhope site would not have a positive impact on the local environment and would be out of keeping with the character of the area. 4. Employment Land Review The strategic employment focus within Sunderland needs to be in accordance with the findings of the Economic Master plan for Sunderland. The Commissioners understand that this supports development of land north of Nissan and within Central Sunderland.</p> <p>A large scale manufacturing or industrial use would not be compatible with the context of the surrounding area or future uses, including the proposed Cherry Knowle Hospital complex, additional new housing and the identified requirement to create a sustainable residential-led community based around Cherry Knowle. The site is isolated in market terms (ELR 2009). A large scale single user development in this area is not consistent with the principle of 'clustering' or 'collaboration' as advocated in the Regional Economic Strategy. It would also not promote self-sufficiency as supported in RSS. The results of ELR make it clear that the Council does not need to have strategic Greenfield 'reserve' sites at both South Ryhope and Land North of Nissan. There is no overriding requirement for additional large scale Greenfield employment sites.</p> <p>Notwithstanding this, if there is deemed to be a need for an additional large-scale 'reserve' employment site, other locations are better suited to a large scale strategic employment site allocation, including the Coalfield area. A proportion of existing older industrial sites are due to be deal located due to their unsuitability and the area is noted as the only one of the four sub-areas already experiencing a fall in employment levels (ELR 2009). The coalfield area has clear requirements for an employment and regeneration focus. The central route will additionally provide an improved access. Furthermore, the RSS for the north east identifies specifically that the regeneration coalfield areas across the region (Houghton-le-Spring being one of the regeneration areas) fulfil their potential and contribute to regional economic growth and social inclusion</p>	<p>Employment Land Review recommends retention of the site for B2 &amp; B8 uses. It forms an important part of City's employment land portfolio. Included in Strategic Housing Land Availability Assessment but described as "Not Currently Developable"</p>

Customer Details			Spatial Approaches				Strategic Sites			Other Comments	Officer Response			
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													<p>. Locational Strategy (Policy 6 of RSS) sets out that: "Plans, strategies and programmes should support and incorporate the locational strategy to maximise the major assets and opportunities available in the north east and to regenerate those areas affected by social, economic and environmental problems. This will be done by the following means, which should also be delivered by the planning proposals: (b) Allowing development appropriate in scale with the regeneration towns...to meet local needs and achieve a balance between housing, economic development, infrastructure and services". The RSS goes on (at paragraph 2.130) to note that job creation and retention is a particular priority in the other regeneration areas. The RES states that enabling these communities to benefit more from – and contribute more to – sustainable</p> <p>economic growth is an essential element of economic inclusion. "Furthermore, many of the former coalfield areas suffer from wider endemic environmental problems and poor quality housing. These areas will also require associated environmental and social led regeneration initiatives to improve the image and business confidence of an area..." (Paragraph 2.130 RSS) "The towns of...Houghton-le-Spring and Hetton-le-Hole are well located in relation to the A1 and A19 strategic corridors and offer attractive locations</p> <p>for economic investment to cater for both north east city regions." (Paragraph 2.132 RSS) It is clear that there is a definite need to focus some large scale strategic investment within the coalfield areas in preference to land at Ryhope. The Church Commissioners support development on the site at South Ryhope, recognising the importance of its strategic location however it is considered that the site should be allocated for mixed use development (employment and housing), which would be more appropriate to the character of the surrounding area in terms of mass and scale. The Church Commissioners are keen to work in partnership with the Council to master plan an appropriate mix of uses.</p>	
Barton Wilmore (Andrew Fleming)	01439	on behalf of Taylor Wimpey UK Ltd	2	4	4	1	An approach which combines Approach D with release of further greenfield sites for residential development.				<p>Land at Burdon Lane/ Burdon Road for residential development</p> <p>We consider it is important to give maximum priority to the South Sunderland sub area. The spatial approaches that advocate the majority of new housing in this sub area are closely aligned with the Regional Spatial Strategy for the North East (RSS), national planning policy and the aims of the City's Sunderland Strategy. Only Spatial Approaches which focus the majority of development activity (housing) in this sub area will stem the declining population of the city. Approach D will have a positive effect on 'developing sustainable transport and communication' in accordance with the Sustainability Appraisal Objective. It is important to note that Consultation at the Issues &amp; Options stage and on the initial Preferred Options document endorsed substantial development in South Sunderland.</p> <p>Is there an additional approach that we have not considered? Core Strategy Approach D is preferred of the four Approaches presented in the Core Strategy – Alternative Approaches document. However, once the deliverability of certain sites identified in the Housing Land Availability Register (Feb 08) for the Sunderland South sub area is taken into account, consideration needs to be given to an additional approach. We recommend to Sunderland City Council, an additional approach which combines Approach D with the release of further Greenfield sites for residential development. We have undertaken a critical review of the large sites (50 plus units) within the Housing Land Availability Register covering the Sunderland South sub area. We have identified 17 sites where we consider there to be issues affecting their deliverability in the timescales envisaged by the Council. The sites we consider to have deliverability issues are shaded in the accompanying table with comments on behalf of Taylor Wimpey (TW) to highlight issues.</p> <p>It is important to bear in mind, in extensive consultations that followed the Issues &amp; Options Report (2007), there is strong support for development to focus on brownfield land, particularly where it is located alongside transport corridors. However, there is also an acceptance by many that some Greenfield development may be necessary to enable growth, where sites are in accessible locations or would support local regeneration. We request that the Council considers the additional approach which combines Approach D with the release of Greenfield site(s) in sustainable locations. Strategic Sites Q2. If not, which do you not agree with and why? Whilst recognising the laudable aim to regenerate the inner urban area, it is apparent from our assessment of sites in the Sunderland South sub area (HLA Register extract, February 2008) that a number of sites identified for this purpose face significant delays and uncertainty in terms of delivery. Please see the attached table which highlights those sites we consider to have problems in terms of deliverability. We accept the rationale for including strategic sites in the Core Strategy but consider that because of technical difficulties which in turn lead to deliverability problems and viability generally, these cannot provide the solution to achieving Sunderland's sustainable growth in isolation. Further Greenfield release sites in sustainable locations should be considered for inclusion in the Core Strategy Preferred Option. Q3. Are there any other sites that you think are strategic to the Core Strategy and should be considered at this stage, and for what uses? PPS3 'Housing' sets out national guidance and subsequent supporting documents and ministerial statements emphasise the need to deliver housing and meet or exceed targets set out in the Regional Spatial Strategy (SRSS). It is also necessary to demonstrate that a site is sustainable and accessible by all modes of transport and in comparison to alternatives. There is also emphasis given to both housing need and demand, plus housing market areas and sub-areas are recognised The RSS net dwelling provision is 700 units pa until 2011 but rises to 940 pa (2011-16) and again to 1,070 (2016-2021). A review of Sunderland City Council's 'Change to dwelling stock in the City of Sunderland' confirms the difficulties the Council faces in overall land supply terms. Whilst figures for 'dwellings gained' appear healthy, this is countered by the fact that there continues to be a high proportion of dwellings lost, primarily through demolitions with subsequent limited net gains. In the financial year April 08 – March 09 there were 843 'dwellings gained', 544 'dwellings lost' with a net gain of just 299 units. In the financial year April 07 – March 08 there were 813 'dwellings gained', 632 'dwellings lost' with a net gain of just 186 units. This is well short of the RSS targets. Deliverability of sites is therefore an issue and there is a reliance on ten Strategic Sites and Strategic Infrastructure projects which have a number of issues to overcome before they can be successfully implemented i.e. landownership/contamination issues/lack of services. The Council acknowledges that most of these sites will take several years to develop, optimistically suggesting, in our opinion, that completion of some will be towards the end of the plan period. The table attached, based on the Sunderland Housing Land Availability Register (February 2008), provides a critical review of 31 large sites (50+ units) identified in the Sunderland South sub area. The review is based on the Council's notes on each site plus our own knowledge of the sites. The table excludes sites discounted by the City Council in the SHLAA process which are subject to significant constraints that preclude their delivery. In summary, 617 of the units have been completed/under construction since the publication in February 2008 of the Housing Land Availability Register; several sites have lapsed consents plus a large number of sites (17) have significant issues to overcome before they can be successfully implemented including technical site issues and viability generally. A number of sites are geared towards provision of flats rather than houses. The table attached identifies the range of issues that are affecting delivery of sites, including several strategic sites namely: Vaux Brewery, Groves Cranes Land, Farringdon Row Phase 1, and the Port (Barrack Road) sites. Given the difficulties the Council has with deliverability generally and the reliance on sites with significant obstacles to development, there is merit in promoting deliverable greenfield site(s), which could help to fill the supply gap in the short to medium term, adopting the Plan, Monitor, Manage approach to housing site release. We recommend the inclusion of an additional strategic site for residential development which is sustainable, deliverable and developable. This is centred on land at Burdon Lane/Burdon Road. The site is located in the southern part of the Sunderland South sub area, between established areas of Doxford Park to the west and Ryhope to the east. The site is bounded by the Burdon Road on its western boundary, Burdon Lane to the south and the Ryhope Doxford Park Link (RDPL) (in part) along its eastern boundary. The Cherry Knowle Hospital redevelopment site is located south east of the site. The site covers approximately 68ha and is primarily rough grassland. The site has relatively few physical constraints; there is one small area on the western side of the site which is identified as in previous industrial use; there is one small archaeological site on the eastern side. There are no statutory nature conservation designations affecting the site. It is outwith designated Green Belt which skirts the southern edge of the sub area. The Burdon Lane forms the northern extent of the Green Belt boundary in this part of the City. Proposals for the site are conceptual at this stage and require to be developed in more detail. Initial concepts are for the provision of approximately 1000 new houses, open space, accommodation of the Ryhope Doxford Park Link road; and potential for community uses. Subject to discussion and agreement with the Council, Taylor Wimpey would propose to accommodate the outstanding sections of the Ryhope Doxford Park Link within the site and contribute financially to their implementation. This work forms part of a Council initiative to provide an improved route between Doxford Park and the city centre to the north. The proposed RDPL will link the former Cherry Knowle Hospital site to the south and Burdon Road to the west. The link will improve pedestrian/cycle accessibility as well as improved public transport in the vicinity of the site. The site is considered to provide a sustainable location for residential development. Shops and services are within walking distance. There are bus stops within walking distance of the site which are served by public transport connecting with the surrounding areas and further a field. The proposed RDPL connects the site to employment opportunities at Doxford International Business Park. Local shops are located within 500m of the site boundary and schools are situated in the surrounding area. The site occupies undulating land. The land form undulates generally in a north west/south east direction with the majority of the site between 100m and 95m AOD. The current UDP identifies the site to fall within an area to be retained for an "open break and wedge between settlements". Sensitive site master planning, will ensure that a settlement break will be maintained. A Landscape Strategy for the site will ensure that the site provides a robust long term defensible Green Belt boundary to the south of the site. It is considered that subject to detailed site master planning, residential development can be accommodated within the site without causing adverse impacts on neighbouring residential areas or the wider landscape. In terms of timeframe, the site is already included in the SHLAA (Years 11-15). However, our clients are confident that the site is deliverable in the short to medium term. The site is available for residential development. It is considered to represent a suitable location within the sub area for release of a green field site situated in proximity to public transport and accessible to facilities. The proposals and site conditions support the stance that the site is economically viable and hence deliverable. The above site is commended to Sunderland City Council for inclusion in the Core Strategy Preferred Option.</p>	<p>Your comments have been noted with regard to option D, and does acknowledge prioritisation of Brownfield Land. Whilst comments are noted in relation to the Sunderland Housing Land Availability Register, this has since been updated by the Strategic Housing Land Availability Assessment 2009 which suggests there is capacity for deliverable and developable sites over the next 15 years.</p> <p>The area does not fall within the definition of Strategic Site as outlined in PPS12. The possible need to consider release of this land for housing in the longer term has been highlighted in the Core Strategy, however this will only take place if no other satisfactory brownfield sites are available</p>		
Mr M Normington	00959		3	4	1	2	High density housing should not be an option.		Yes		Combine new road into South Hylton with new Bridge Project, a road joining Claxheugh Road below Claxheugh Rock to roundabout at the end of European way.		Comments noted and forwarded to Street Scene Services	
J & U Byron	01440								No	Site 1 - North of Nissan - see comments		<p>Many thanks for our copy of 'Your city...your say' Isn't it pretty? It reminds me of a particularly good dissertation. I'm afraid that we cannot give an order of preference between the Spatial Approaches. They all appear to have the same fault. Could you please justify your claim, (Point 10 in Strengths of Spatial Approach), that it 'Would protect green spaces and nature conservation sites across the city, as well as the broad extent of Green Belt and open countryside'? It would appear from your plans that the green belt to the north of Nissan and to the south of Ryhope will disappear. Core Strategy B also eliminates the green belt in North Sunderland for residential purposes. The claim that the 'natural environment will be enhanced and protected' does not relate to the suggested Strategies. Does the plan to erode the Green Belt adhere to national and regional planning policies? We have lived here for many years. The cottages are described by Estate Agents as 'highly desirable' and semi - rural. They bring high prices. In return we</p>	<p>A response was sent by the Planning Policy Manager on 28th January 2010. The requirement for a new employment site to the north of Nissan has been informed by a recently completed review of all land allocated for economic development and future employment requirements of the city. The Employment Land Review (ELR) recommended that there is a shortfall of strategic employment land in the Washington area. A strategic development site needs to be of a size able to accommodate new development and associated infrastructure. The review recommended the size of the site to be approximately 30-40ha. A potential site was identified in the Review in the general locality of north of nissan. The Core Strategy Alternative Approaches consultation proposed the site on the basis that the site offers the potential for future economic</p>	

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Name of Respondent	Cust Ref	Company/Organisation	A	B	C	D	Comments?	Any suggested other approach?	Yes/No	If not, which do you not agree with and why?	Any other sites we should consider and for what uses?		
												<p>have to live with: - 1 The building of Nissan. 2 The traffic noise and lack of consideration from the lemmings escaping. (Did you know that they have a change in shift at 1.20 am - very wonderful for lack of sleep) 3 The amount of lights in the factory and car parks = light pollution. 4 The noise from the factory, particularly at night = noise pollution. 5 The amount of chemicals escaping from their filtration system = air pollution. We also had to go through the trauma plans to build the new football stadium, plus sports centre and shopping mall on top of our properties. Now the great god Nissan is making more demands. Is the Council proposing giving them the land in order for Nissan to sell it off to its satellite companies, as happened last time? Alternative? There are several of their original factories in Cherry Blossom Way empty and traffic lights and land levelling between Nissan Way and the Test Track as yet unbuilt upon. I'm sure there's lots more brownfield sites in need of regeneration. Instead of asking for approval for your schemes could you please explain your plan for the cottages, the Three Horse Shoes and North East Aircraft Museum? .</p>	development that may support the new generation of low carbon industries located close to Nissan and also the adjacent road network.
A J Le Blond	00942					1					<p>All of which appear to be on the flight path to Nissan's plans</p> <p>As the Council will be aware my interests are centred around Hetton Le Hole which, as a result of Council policy has been subject of no significant new housing or employment development over the past 40 years. My land at South Lodge Farm, North Road, Hetton was identified for housing on a Council plan in 1975 but this was never followed through. Hetton is now paying the price for this neglect with population loss and a declining centre resulting in spiral of decline. What Hetton le Hole needs is new housing, employment, and road infrastructure investment to reverse this trend. It is critical that the LDF delivers on these issues. Core Strategy - Alternative Approaches - My preference is for 'Approach D : Sub Area Spatial Requirements'. As suggested this approach will address local needs and priorities within the framework of an overall sustainable 'city</p> <p>wide' approach to spatial strategy. The strengths and weakness of each of the four Approaches, as detailed on pages 6 and 7 of the Council's document, identify Approach D as the approach with the most 'significant positive impacts' (12) and the least 'significant negative effects' (1) Overall therefore it is clearly the best option. I would however comment that I do not consider that the single 'significant negative effect' identified for Approach D, identified by the Council i.e. that it would result in development incursions into the open countryside in the south of the city, need necessarily be considered so significant and is certainly not as significant as releasing land from the Green Belt to the north of the City and Washington as proposed in Approaches A and B. Any such concerns could be overcome by tweaking Approach D slightly so that a slightly higher proportion of the additional housing is focussed in the Coalfield area rather than the main urban area of Sunderland. Increasing the proportion of additional housing requirements to be delivered in the 'Coalfield' area from 20% to e.g. 22%, together with a consequential reduction of the additional housing figure for 'South Sunderland',</p> <p>would address the Regeneration aims for the Coalfield as defined in the RSS and help relieve the pressure to develop on remaining Greenfield land on the southern edge of the City. The resulting additional housing development in the Coalfield could be delivered on a mix of brownfield and Greenfield sites in sustainable locations, would help support population levels in this area, would help deliver an improvement to the vitality and viability of town centres and services and would compliment existing employment opportunities. Core Strategy - Strategic Sites - The distribution of strategic sites shown in the report is unbalanced with all being concentrated in or around the main urban area. I also note that most of these are long standing sites, some of which already allocated in the UDP and/or have planning consent. The Council is not therefore proposing</p> <p>anything new. Does the Council have no proposals for strategic sites in the Coalfield other than the proposed Central Route, which I note from the diagram in the report is now much foreshortened and does not extend to serve Hetton le Hole as originally proposed? The lack of any specific regeneration sites together with the foreshortening of the Central Route proposal to exclude Hetton Le Hole shows a lack of imagination and reveals the Council's complete disregard</p> <p>and lack of commitment towards the regeneration of this area in their approach to the future planning of the City. I support the idea of a Central Route but would recommend that the full extent of the proposed Central Route is included in the LDF and that the LDF identifies one or two large strategic housing sites to help deliver regeneration and the spatial strategy adopted. SHLAA 2009/10 - Site 163 South Lodge Farm - I note that the Council's March 2009 SHLAA identifies my land at South Lodge Farm, North Road, Hetton Le Hole (Site 139) as a site that is 'developable' and suggests a start date of within 11-15years. The Council long overdue recognition that this site is indeed developable.</p> <p>for housing is welcomed. However I can see no justification for the Council's assumption concerning the 11-15 year start date, particularly in comparison against some of the other sites that have also been identified in the SHLAA, but have then been classified as deliverable (1-5yrs) or developable (6-10years) especially when these are in less sustainable locations. For example sites such as 339 and 197 as well as being both Greenfield would, if developed substantially reduce this important gap between settlements</p> <p>and involve development on land explicitly classified in the UDP as existing or proposed Open Space. Site No 131 further along North Road to the north of my site is also surprisingly identified as 'Deliverable' yet is Greenfield and would result in a reduction of the settlement gap at its narrowest point. The owner of this site has already cut down a roadside tree on my land without my permission in order to achieve necessary sight lines. Clearly the owner does not therefore control all the land necessary to make this site deliverable as the Council assumes and I would question whether it is truly deliverable. Why should such sites be considered preferable and given priority above Site 163? This</p> <p>makes no sense, especially when these sites would be less accessible in terms of access to public transport, local services and shops, open space/woodland and employment opportunities than site 163. The Council has clearly not undertaken any form of rigorous sustainability of competing sites in coming to its conclusions. I would also comment as follows on the assumptions/ comments made in the SHLAA about develop ability of Site 163. Site Capacity - the site's area is given as 10.4ha but the site</p> <p>capacity only 156 dwellings - well below conventional average densities. This assumes low density executive housing on this accompanied by extensive landscaping/open space. I would be more than happy to consider such a development approach, which none of the other sites identified in the SHLAA could deliver. Such an approach would be in line with the Council's own admission that there is a shortages of sites for executive housing in the Coalfield area. Flood risk - The site bounded by a beck to the west. However the steepness of the beck sides make it highly unlikely that risk of flooding will be an issue on the vast majority of the site. If this area were to be excluded from any development</p> <p>proposals the flood risk classification would be Zone 1 i.e. area of least risk. General comments - Settlement Break - The site is shown within the settlement break defined in the UDP. However this is inaccurate and misleading. The development of this site for housing would not compromise the perception of the 'gap' between Hetton and East Rainton because it is not in the gap and because of the form of the land and existing tree cover. The latter results in part from the 11 acres of woodland that I have planted in this area</p> <p>which is open to the public. Education - Housing development on this site could help fund the provision of a new school or extensions to existing schools in the area if required. Highways - As highlighted above the Hetton Bypass no longer seems to be included in the Central Route proposals. However as previously indicated to the Council I would be happy to make an appropriate contribution to the funding of a by-pass if planning permission were granted for housing on this site. Indeed I previously offered £10m to the Council towards these works as part of previous planning applications on this land. If this is a real issue wouldn't it be better to bring the development of this site forward so</p> <p>funding can be obtained ASAP? The development would in any event be highly accessible even without the by-pass. It has direct access to north road and thence to the A690, it is on a bus route and is within walking distance of Hetton Town centre, shops, schools ect. To seek the development of housing on this site on this basis is not sustainable. I also note that the Council has not sought to raise the same objections in relation to other sites in the Hetton area, that they consider more deliverable and developable. Why is this? Gradient - I agree the site slopes but only to any material extent along its western boundary. The vast majority of the site is readily developable.</p> <p>Comments from key stakeholders - I disagree that the site is not a suitable site. The Key stakeholders referred to in this context primarily include house builders and developers who are undoubtedly promoting their own sites for development in the Coalfield area. Their comments are therefore biased and aimed at downplaying the deliverability/develop ability of my site favour of their own interests. This assessment should be completely ignored. The Council does not state what capacity issues there may be with water treatment in this area. However I note that this has not prevented the Council allocating other sites for development. It must be assumed therefore that any drainage/sewage treatment issues can be overcome. Comments relating to the potential impact of the development on the capacity of the A690 are ridiculous, but would be looked as part of any planning application. Again this issue does not appear to be an issue that has been flagged up in connection with other sites in the Hetton area. SHLAA 2009/10 Site 145 - Hazard Lane - I disagree with the Council's assessment that this land is not suitable for residential development.</p> <p>It is a previously developed site that lies adjacent the secondary school and the urban area of Hetton Le Hole and is a sustainable location for development. Indeed it forms part of the same field on which the school and the recent additions were built. In terms of the Council's assessment in the SHLAA Annexe most of the description is the same as for site 163 and my responses on these issues/objections are therefore the same as those above. In addition however I disagree that development would not be possible because of the coast of infrastructure provision. On what basis has this assessment been made? It is not correct. I would stress again that the site is previously developed. Historic plans show it forming part of a former industrial operation. There is evidence of built structures under the grassed surface and the site has very limited top soil. It is of no value as agricultural land and is in need of reclamation/remediation for beneficial use. I would be grateful if you would make the necessary changes to Core Strategy and the 2009/10 SHLAA to reflect these comments.</p>	Comments noted. We agree there is a need to prioritise the reuse of sustainable Brownfield sites whilst as far as possible limiting intrusions into the greenbelt. To accommodate the development requirements set out in the Regional Spatial Strategy, there will be a need to develop sustainable greenfield sites. The points made are not strategic in nature and will be considered in the revision to the Strategic Housing Land Availability Assessment (SHLAA). Site specific issues are not considered through the Core Strategy. The Merits of the points to be considered will be made through the SHLAA, followed by the Allocations DPD.	
Savills	01442	on behalf of Peel Holdings	1	1	4	4					<p>Peel is the freehold landowner of the Peel Centre, located on Spire Road in Washington. The site provides a number of retail units across two phases, currently occupied by Homebase, Carpetright and Wynsors world of Shoes, with two vacancies at Phase 1, and a vacant large unit at Phase 2. There is also an extant permission for an extension to the existing retail park at Phase 2 (ref. 07/02808REM).</p> <p>The park is well established as part of the hierarchy for shoppers in the catchments area. Its very existence requires the local authority to take it into account in planning for improved consumer choice as well as facilitating retailer competition.</p> <p>Core Strategy Alternative Approaches</p> <p>The Core Strategy Document will become the primary document shaping local policy in the local development framework. The Alternative Approaches stage is the third stage of consultation, having taken account of the consultation comments made in the Issues and Options Report of 2005 and the Preferred Options Report of 2007.</p> <p>The Council have identified four alternative approaches (A – D) for development to address the comments raised in previous reports. The document examines the strengths and weaknesses of each Approach based predominantly on housing and employment factors and impact on the greenbelt.</p> <p>Approach A suggests focus is on regenerating the main suburban areas of Washington and existing transport corridors and identifies Washington's role as a regional centre.</p> <p>Approach B enables the principle of development to be focussed not only on the city centre, but also on other main centres and accessible locations in or beside areas of deprivation and on brownfield land. Approach C promotes the green space and water related features, focusing development on brownfield sites within the urban boundary.</p> <p>Approach D identifies Washington town centre for distribution/logistics activity, while focusing main economic development in Sunderland City Centre. It also suggests reducing housing supply, which may result in population decline locally.</p> <p>Due to its excellent road communication, existing shops, strong employment base (e.g Nissan, Asda depot) and availability of land around its outskirts, Washington represents an attractive and deliverable opportunity to provide for future economic development needs which stands the best chance of delivery by the commercial market. New house building in the Washington area would also underpin that.</p>	<p>Comments noted. The Retail Capacity Study 2009 showed limited justification for continued growth of out of centre locations. PPS 4 protects the existing vitality and viability of existing centres.</p> <p>Consideration has been given to relaxing conditions on Units at to allow sale of wider range of goods although this is not a matter for Core Strategy. The Retail Needs Assessment does not identify a qualitative need for any additional retailing in Washington. Applications for retail development at Peel will be assessed through PPS4</p>	

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												Approaches A & B acknowledge the support for the intensification of employment land within Washington during consultations on the Issues and Options stage and Preferred Options stage. Both these approaches would be supported by Peel as they would ensure continued regeneration of Washington and its continued strategic importance to the region, which is in line with Peel's own aspirations.  General Comments  The document Core Strategy Alternative Approaches is supported by a number of Topic Papers which are also of relevance including 'Topic Paper 1.5 - Retailing and Town Centres'. This paper recognises that planning for the future shopping requirements needs to have regard to a realistic assessment of market demand, including retailer formats and store requirements. This is illustrated at paragraph 8.4 which states:  "Whilst the UDP emphasises the need for in-centre development, the lack of commercially suitable sites in these locations is cited by supermarket operators as a reason for concentrating on out-of-centre/ non-allocated sites; the mid-market operators prefer – and seek - sites adjacent to major roads. With these factors in mind, it is important that the Core Strategy's approach to retail, leisure and other town centre uses recognises that development control decisions will need to have regard to commercial realism. In the case of Washington, it recognises that there is a lack of commercially suitable sites in the Washington area as it concludes at paragraph 9.6 that:  "There is pressure for additional retail uses at the Peel Retail Park due to the lack of sequentially appropriate sites within Washington and Concord centres and the role of this retail park is changing".  With that in mind, the Core Strategy should also acknowledge the important existing and future role that the Peel Centre fulfils in meeting the shopping needs of Washington residents.  Conclusions and Recommendations It is important in preparing Local Development Frameworks that any allocations stand a realistic prospect of being delivered. With this guidance in mind, and in the light of the above, our conclusions and recommendations are that:  1. Peel supports Approaches A and B which encourage future development in and around Washington; These options represent the best chance of improving economic performance and delivering new economic development.  2. The Core Strategy should also acknowledge the important existing and future role that the Peel Centre fulfils in meeting the retail needs of local residents and this should be in the context of the Council's recognition that there is a lack of suitable sites within the town centre. In light of the Council's recognition that there is a lack of suitable sites in town centre locations, the Peel Centre should be identified as a preferred location for additional retail development.	
Jenny Loring	00266	Natural England										2.2 refers to the Appropriate Assessment (AA) - the Assessment under the Habitats Regulations (Reg 85) should be carried out as an iterative process and used to inform and justify where appropriate the approach adopted. We would expect to see some report of the process to date. 3.5 Point 3 refers to carbon emissions and energy and reducing the need to travel. This should also encourage Active Travel ( including cycling and walking ) through sustainable networks as an integrated part of multi-functional green infrastructure. Point 9 refers to protecting the countryside. This should include both protection and enhancement of the natural environment (biodiversity and geological conservation) and landscape character within rural and urban areas. Point 10 refers to linked green space. This should also be as an integrated part of multi-functional green infrastructure which should also contribute to improving health and wellbeing in the community – which should in itself be a key policy objective. 3.6 should also encourage Active Travel ( including cycling and walking ) through sustainable networks as an integrated part of multi-functional green infrastructure. 4.4 Strategic Sites 2 The Groves, the exact location of this site is not clear from Figure 2 but we note that it is close to 2 Sites of Special Scientific interest: Claxheugh Rock and Ford Limestone Quarry SSSI and South Hylton Pasture SSSI. Any development should ensure there will be no adverse effect on this sites for example through increased access damaging sensitive vegetation. 5 Alternative approaches It is fundamental that the adopted approach , which ever alternative is chosen, should embed delivery of improved, integrated, multi-functional green infrastructure with no loss of the existing provision. This should be part of a strategic green infrastructure strategy for the City of Sunderland in its entirety. Without detailed site allocations we cannot comment specifically on the strengths and weakness of the 4 options with regard to the natural environment.	Comments noted. An Appropriate Assessment will inform the Revised Preferred Options of the Core Strategy.
Paul Bennett	00961	Trees & Wildlife Action Group	3	1	4	2	Protect The Great North Forest. Protect existing green open spaces. Enhance wildlife corridors.		No	The sites listed as 1 - North of Nissan and 9 South of Ryhope. Green belt and Green open space should not be developed but preserved for employment of future generations.	No		Comments noted. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development.  Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham.  The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production,.
Dr Hugh Newell	01429	North East Aircraft Museum	4				Land 'North of Nissan' unnecessary as plenty of brown field sites available in next 20 years.		No	1. Land North of Nissan - Site is nearly Green Belt, virtually the last between Washington and Sunderland. There are plenty of brownfield sites available for development in the next 20 years.			The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production,.
Drivers Jonas LLP (Richard Bailey)	01445	C/O Aberdeen Property Investors Uk Ltd	1	2	4	3	Under Approach A, Washington will be provided with growth to continue its important role as a regional centre for distribution/logistics. Approach A also supports the need to balance employment growth at Washington with residential growth. Directing higher levels of housing and employment growth to Washington will ensure that it continues to grow proportionally with the rest of Tyne and Wear conurbation and continue to provide access to services, facilities and employment for its residents and the higher population.		Yes				Comments noted
Edward Flood	00887		3	4	2	1			Yes				No response required
Ward Hadaway (David Brocklehurst)	00089	on behalf of Hellens Development Ltd	2	1	3	4	Ensuring the preferred approach increases the % of new housing development to 20% for Washington		Yes			<ul style="list-style-type: none"> <li>• Acknowledging Planning Policy Statement 12, there is clear guidance that the delivery of the policies within a Core Strategy is particularly important. Acknowledging this, the submissions of Hellens Development Limited to this Core Strategy Document are on the basis of an approach that they consider to be deliverable for the City;</li> <li>• PPS 12 also sets out that Core Strategies and other Development Plan Documents must be flexible and Hellens Development Limited are concerned that the City of Sunderland Council favour an approach which locates the majority of development within one specific area of the City with the aspiration of regeneration at the expense of other parts of the City. It is noted that in the first years of the Regional Spatial Strategy that the City has failed to deliver the number of new houses allocated by the RSS and Hellens Development Limited are concerned that focusing the majority of development within South Sunderland could accentuate this problem given that the majority of the sites identified in the SHLAA and which form the basis of some of the approaches put forward, will take a number of years to bring forward and represent very similar sites locational within a predominantly urban area. Hellens Development Limited would be concerned that such sites will rely heavily upon high density development and notwithstanding the current economic climate, such a strategy could accentuate the current under supply of housing provision experienced to date;</li> <li>• It is disconcerting to note that the Council's strategy under Approach C where there is a recognised shortfall of 1,500 houses is to make up this deficit with high density housing. Whilst our client would support the release of some employment land for new housing and representations on that basis have been submitted to the Strategic Housing Land Availability Assessment, our clients would not support a way of dealing with an under supply to increase Spatial Approaches – Question 1</li> </ul> <p>As set out above, it is evident from some of the approaches that there is a heavy reliance upon development within Sunderland South and to a degree, the settlement of Washington has been overlooked despite the fact that it accommodates 20% of the population of the City. Hellens Development Limited, being located within Washington recognise that the settlement has available land that can accommodate a higher percentage of new housing and employment. Acknowledging that each approach shows a strategic employment allocation within Washington, we would submit that the settlement should also accommodate a higher percentage of new housing. Accordingly, our client would have the following preference in priority order for the approaches given:</p> <ul style="list-style-type: none"> <li>• Approach B</li> <li>• Approach A</li> <li>• Approach C</li> <li>• Approach D</li> </ul>	Comments noted

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												Additional Approach Whilst our client does not have an alternative approach to those presented, we would suggest that acknowledging that 20% of the population of Sunderland are located within Washington that the settlement should accommodate a higher percentage of new housing than is set out in Approach B. Notwithstanding that the adopted Sunderland SHLAA identifies that 15% of the available land in Sunderland over the next 5 years and only 6% of the next 15 year land supply is located within Washington we consider that there are further sites available particularly through the release of employment land for new housing development within Washington. Therefore whilst Hellens Development Limited do not suggest an alternative approach, they would suggest an increased percentage of new housing development to 20% and that the balance be taken from the other areas of the City, thus creating a similar level of allocation of new housing for Washington and Coalfield, a majority within South Sunderland and a minority of new development within North Sunderland. Strategic Sites Question 1 Hellens Development Limited generally agree with the strategic sites suggested in the Core Strategy. Question 2 Not applicable. Question 3 Hellens Development Limited do not consider at the current time that there are any further strategic sites that should be allocated within the Core Strategy.	
Paul Bell	01377				1		Left sunderland on, 1) Nothing for teenagers in sunderland, transport connection to Durham not good, 2) not in rating in community any more			Should be some in other area apart from central sunderland			Comments noted
James Magree	01382			1			Gentoo quicker, more jobs						No response required
John Tumman/Michael Gray	00080		3	2	4	1						General Comment Scale of Loss if Green Belt Land: The Regional Spatial Strategy includes a requirement to maintain the broad extent of the Green Belt to prevent the merging of Sunderland with Seaham, Houghton Le Spring, Washington or Tyneside (Para 1.5 of the Core Strategy document). All four approaches include a 33ha strategic employment site in the Green Belt north of Nissan and an extension of the 20ha site at Ryhope allocated in the UDP to 40ha, again taking Green Belt land. It is hard to reconcile the apparent loss of at least 53ha of Green Belt land or, in the case of Approaches A and B, even more, with the RSS. Although the words 'broad extent' implies there to be some scope for amendment, the scale of loss of Green Belt land throughout the Approaches is of great concern. North of Nissan, the role of the existing Green Belt in separating Sunderland from both Washington and South Tyneside is fairly tenuous as it is. An extension of the allocated site south of Ryhope appears most likely to involve incursions of land to the south, in what is already a very narrow strip of Green Belt. Given that on the Seaham side there is development in proximity to the City boundary, further encroachment into the Green Belt will virtually lead to the merging of Ryhope with Seaham, there being only approximately 500m separating the site from employment development in Seaham; this seems definitely contrary to the RSS. The score for Sunderland and Seaham merging at a future date is reinforced by the lack of Green Belt designated in Seaham to the south of Ryhope site. It is suggested that these major incursions require a detailed justification and should only be pursued if the Council can demonstrate that there is absolutely no alternative way in which an adequate supply of employment land can be provided, including re-visiting housing allocations on former employment land and possibly substituting them with new peripheral allocations, possibly Greenfield, but not Green Belt. Detailed comment on the proposed strategic employment locations is set out under the 'Employment' sub-heading. The Need for 'Credible Approaches': Sub heading 2.0 refers to "the need to create credible alternative approaches", whilst Para 2.2 quotes PPS12 "the proper consideration of 'realistic and genuinely deliverable' options is key to developing a justifiable plan". It also quotes the Planning Inspectorate document 'Lessons Learnt Examining Development Plan Documents': "Options needs encompass the full range of reasonable spatial options". However it is debatable whether the options which the Council has developed are necessarily 'credible', especially Approach 'C', nor whether they reflect the 'full range of reasonable spatial options'. These matters are expanded upon in both the following point and in the section of these comments dealing with the approaches. The Potential Role of the 10 'Strategic Sites' in providing 'Credible Approaches' Crucial to the question of the general credibility of the four approaches is the treatment of the 10 'Strategic Sites'. Para 4.3 states "Ten 'Strategic Sites' have been identified as critical to the delivery of the Core Strategy and where site preparation requires a long lead-in (due to contamination or ownership issues, for example). Much of the significance of the sites is due to their physical scale and impact; each will make a vital contribution to the agreed city-wide priorities of the council as set out in the Sunderland Strategy. However they also have a 'local' dimension in that they provide particular regeneration benefits to specific parts of the city". What the document does not make clear is that most of these sites, and the uses proposed for them, are those set out in the adopted UDP as amended by Alteration No 2. Whilst agreeing that the strategic sites are 'critical' to delivery of the Core Strategy, their potential role in providing a wider range of credible approaches by considering uses or mixes of uses other than the current allocations has been ignored. It is appreciated that sites which have planning permission may have to be accepted as 'given' but others, such as Stadium Village, Holmeside, the Port, South Ryhope and, especially, the site north of Nissan which is arguably the only completely 'new' site, do not have permission. The non-inclusion of these sites for alternative development forms within the four approaches inevitably constrains the range of options which can be considered, hence the effectiveness of the approaches achieving strategy. To take this point further, Section 3 sets out the background to the four approaches. Para 3.1 indicates that 5 development options were put forward for consultation. Para 3.2 states "A limited but informed response indicated that the most popular options were to focus development around public transport corridors and brownfield land, followed by the housing-led regeneration option. The least popular options were to continue following the UDP and focusing development in the most deprived areas". In view of the fact that continuation of the UDP which was clearly rejected in the Issues & Options consultation. Further, it is noted that two of the so-called 'Strategic Sites' are, in fact road corridors. Whilst construction of these roads may well generate development interest, for the Council to maximise this potential in regeneration terms, it needs to identify 'strategic nodes' at junctions ECT and ensure that areas of land of an appropriate size shape and location come on stream to provide co-ordinated prestige developments. This could involve either the Council or some other public or private agency acquiring the land, but the potential of the role of the Council to initiate such developments through site identification and positive policies cannot be over stated. The Port: The port is included as a 'strategic site' for port related uses. Increasingly it is evident that the port, in its present form, is not a viable proposition, but the Council refuse to acknowledge this. In all probability the South Docks will close to commercial traffic at some future date; in this eventually alternative uses will have to be found. Sunderland Civic Society has previously suggested a mixed use housing/water related sports/ business park development there would take advantage of the area's waterfront and water based location and could do much to regenerate the surrounding area (see submission to UDP Alteration No 2). Perhaps the strategic potential of the South Docks for a range of alternative uses could be examined as part of the gestation of the LDF. The Varying Potential for the Development of the City Centre in the Approaches in Relation to Sustainability: Para 4.0 states: "Every option put forward must be realistic and achievable, and adhere to the principles of sustainable development, which is central to national, regional and local policy" and the third bullet point to 4.1 states that the four options should follow certain principles, one of which is: "The need to strengthen the city centre and central Sunderland, and recognise the wider strategic role of the city centre in supporting overall city development". Whilst it is of course possible to argue for the maximum retail development in the City Centre irrespective of the options, different patterns of housing development will have different implications for access to the City Centre, hence the underlying sustainability of planning policy relative to transportation matters. The role of City Centre appears to be taken as a 'constant' across the options, whereas a larger concentration of new housing in say Washington and the Coalfield area could reasonably be expected to lead to additional retail development there. Conversely, a concentration of new housing development in urban Sunderland could add to the retail needs of the City Centre. Perhaps clarification is needed as to the assumptions which underlie the Council's view of the future role of the City Centre, and the relationship of its development with transport sustainability. Housing Development Housing Numbers: The RSS assumes an average of 880 new houses net per annum over the period to 2021. Para 1.5 of the Core Strategy document reflects this in the last bullet point which states "deliver 14,960 net additional dwellings as a minimum for the RSS period 2004-2021". As the Core Strategy will make provision to 2026, the Council propose to increase the total number of net houses to be built by 1,455 giving a total of 16,415. However Para 28.4 of the RSS states "the first round of Local Development Documents should make the assumption that the annual average rate of provision during the early years after 2021 will be the same as the average for 2004 to 2021." In Sunderland's case, this would give a 2026 total requirement of 19,360 new houses net; the 1,455 actually proposed represents less than a two years supply. The reason for this disparity is not evident. Employment Location of Employment Land: General: Throughout the approaches, provision of adequate employment land is dependent on the use of two sites which are not only Greenfield, but which are also for the most part Green Belt land. Given the thrust of the RSS, the need to minimise use of the car, sustainability and containment of the built-up area the acceptability of inclusion of these sites is debatable. To be truly sustainable, new employment areas should be well related to the public transport links; the potential of upgrading such facilities should therefore be investigated. Strategic Site North of Nissan: The 33ha Strategic site north of Nissan is not included in the Regional Spatial Strategy and, although considered previously by the Council in connection with the formulation of the UDP, is to all intents and purposes a 'new' site. We understand that the original intention was for a joint strategic site to be identified in conjunction with South Tyneside and Gateshead. Although there is a 20ha 'key' site proposed in Gateshead, there appears to be nothing now proposed in South Tyneside. How has this situation come about? The RSS seeks to maintain the broad extent of the Green Belt to prevent the merging of Sunderland with, inter alia, Washington and Tyneside. Given that the proposed site is wholly within the Green Belt land serious issues are raised, possibly including one of conformity with the RSS: a detailed justification is therefore required for its development. Further, we wonder what the adjoining authorities view on this site is, as in effect the maintenance of a Green Belt between Sunderland and Tyneside will fall on their shoulders, whilst Sunderland will benefit.	Comments noted. The land at South Ryhope as allocated for economic development in Policy SA4.2 is not allocated as Green Belt, the boundary as defined on the UDP Proposals Map indicates the Green Belt boundary is located to the south of Cherry Knowles Hospital and the land allocated for economic development. Policy CN2 of the UDP provides further guidance relating to the Green Belt and confirms the Green Belt will be maintained preventing the merging of Sunderland with Seaham. The proposals outlined in the LDF Core Strategy: Alternative Approaches consultation retain the existing Green Belt corridor as indicated on the UDP Proposals Map and remain in accordance with Policy CN2 of the UDP, Policy 9.5(b) of the adopted Regional Spatial Strategy and Policy 4 of the Easington Local Plan which seek to prevent the merging of Sunderland with Seaham. The South Ryhope site is not 40ha, it is 20 ha with the other 20ha forming the contribution from the strategies sites located in central Sunderland. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production. The background topic paper on Strategic Sites considered other options. There is a need to provide the long term certainty of sites. Also to reflect the findings of the Alteration No.2 inspector who in curtailing the plan period from 2021 to 2012 recommended that these sites should be considered through the LDF. With regard to the point raised on density of housing, if we were to increase the density we may not provide the type of housing that retains the young, working cohorts that we need to retain in the city. Comments re option D have been noted.

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												<p>South of Ryhope: This 40ha site appears to be an extension to the 20ha site allocated in the adopted UDP. Comment has earlier been made about the appropriateness of this site in relation to maintaining a settlement break with Seaham. The lack of a Green Belt to the south, along with an existing industrial estate north of Seaham and west of the Ryhope site makes likely the prospect of a future merging of two settlements, leading to urban sprawl. Retention of a break is considered essential and any allocation should reflect this need, in both its size and shape and location. There is a further criticism of a major employment allocation in this location. Although in proximity to the A19 (T) there is not a full junction at this location; unless a new junction were proposed to provide for a full range of traffic movements, any traffic generated heading north or coming from the north would have to pass through the built up area of Sunderland or, less likely, Seaham, increasing traffic volumes and to the detriment of the environment. The lack of ready comprehensive access from the regional road network may also have an adverse effect on the attractiveness of the site to investors. It is concluded that the advisability of extending the present allocation is doubtful without construction of a full junction arrangement to the A19 and safeguards to avoid settlements merging.</p> <p>Evaluation of the Four Approaches General Overview: As noted earlier, the potential of all of the four options as 'credible' approaches are unduly constrained by the acceptance of uses determined in the adopted UDP on most of the 'Strategic Sites'. These uses necessarily reflect the strategy of the adopted UDP. The need to review uses on these sites wherever possible is particularly relevant to the development of a Core Strategy as a continuation of current UDP strategy was identified as the least popular approach at the 'Issues and Options' stage. It would therefore be desirable to see a second round of consultation based on a range of approaches to the core strategy which allow for alternative forms of development on those strategic sites identified which do not have planning permission, along with inclusion of specific 'nodal' strategic sites along the identified transport corridors.</p> <p>Protection of a Public Transport Corridor to Doxford International: We note the Approaches all provide for protection of the Sunderland Strategic Transport Corridor, the Central Route in the Coalfield area and the Leaside line. Additionally we would like to see the route from the City Centre to Doxford Park protected as a potential transport corridor, as indicated in the adopted UDP (SA48(4)). The growth of Doxford International and inadequate car parking facilities there is increasingly emphasising the need for a dedicated public transport link to be provided along this corridor.</p> <p>The Potential Role of Existing Green Belt Land North of Nissan: The Nissan development effectively resulted in the loss of a Green Belt break between Sunderland and Washington, and current proposals within its perimeter will increase the intensity of development there. Although maintaining the severe reservations about loss of Green Belt land noted above, if it can be demonstrated that there is no feasible alternative way of making a sufficient supply of well located employment land available it must be accepted that there is a need for the proposed strategic employment site north of Nissan. In this case there is an argument for going further than the current proposals and deleting the remaining Green Belt to the north of Nissan within the City boundary to accommodate the further housing land which would be required in approaches 'A' and 'B', along with any other land needs, rather than have other incursions to the west on the north side of Washington. These two options, and possibly the others, could then be revisited to evaluate the resulting possibilities. If the current proposal for an employment site in this locality proceeds it is likely in any event to place pressure on the remaining Green Belt land in the area in the future; facing up to this prospect at this stage may facilitate a better urban form. In this scenario a Green Belt would still remain to separate Sunderland from Tyneside, although this would be entirely within South Tyneside &amp; Gateshead rather than Sunderland.</p> <p>Approach 'C' Focus Development within the Current Urban Area, is neither a 'Credible Approach' nor 'Realistic': It is difficult to see how this approach can be acceptable in its present form for three reasons, namely:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> It would fail to meet the housing target by nearly 1,500 houses; the Core Strategy document refers to this deficiency to be 'made up with higher density housing and housing on released employment land'. Apart from the fact there is no quantification of the densities required, there are 2 points which arise here; if a higher density would be environmentally acceptable on sites in this option, why not in the other options, thereby reducing overall land take, whether brownfield or Greenfield. Further, it is not clear if the 'released employment land' referred to is responsible for the 20ha deficit in employment land (see next bullet point).</li> <li><input type="checkbox"/> There would be a deficiency of 20ha of employment allocations over RSS proposed levels. These issues seriously undermine the credibility of the option in terms of delivering the Council's population and regeneration objectives, as well as its failure to adequately reflect the RSS.</li> <li><input type="checkbox"/> There is another way in which the option is not credible. Fundamentally in its present form it does not and cannot achieve the aims set out in Para 5.24 as the pre-ambles to it, namely "Concentrate development within the existing urban area and on suitable previously developed land (brownfield) retaining open space and countryside". This is reinforced in Para 5.26 that it "would restrict development to brownfield land and ensure the retention of the City's existing green and blue space". Para 5.30 acknowledges this but in a heavily qualified way. "To meet RSS targets could (my emphasis) require a limited number of incursions into the urban fringes as well as four significant Greenfield urban extensions" This is understatement, to put it mildly. Even with incursions the option does not meet RSS targets. Arguably, for the option to be credible and concentrate development in the built up area, the two Green Belt sites, north of Nissan and south of Ryhope, should be excluded from the option as they are outside the urban area, although 20.3ha at Ryhope is allocated in the current UDP. Exclusion of these sites would mean RSS targets could not be met, making the option non-viable.</li> </ul> <p>For the above reasons, Approach 3 can not deliver the desired outcomes and should therefore be deleted.</p> <p>The Desirability of Re-appraising the Approaches: It is concluded from the foregoing observations that the four approaches, in their current form, are deficient and need a comprehensive revision to make them more wide-ranging and credible. A Preferred Approach: Subject to our general reservations about the present Approaches as outlined above within the context of the options currently posited, our preference would be Approach 'D', Sub-Area Spatial Requirements. This offers a development form which will allow for natural growth within the sub-areas to meet the 'organic' local needs of each without the degree of incursion into the Green Belt that would be necessitated in the other two remaining credible options ('A' and 'B'). Perhaps the major drawback of the approach is the limited scope for new housing development in Washington and possibly North Sunderland, despite the proximity of these localities to the proposed Strategic Employment site north of Nissan.</p>	
Peter Jordan	01292	HBF	2	3	4	1	This is subject to clarification that non Green belt sites can come forward and a delivery focus being enshrined.	Effectively - an adaptation of Approach D	No	They must be pivotal to the delivery of the objectives, some sites are infrastructure that opens up development	Ryhope to Doxford Park Road link - This is a key to existing and potential development areas in South Sunderland which is where the larger concentration of development is.	<p>From the industries perspective we favour Approach 4 as it is quite simply the most practicable option with the most chance of delivering key objectives. The weighting given to the South Sunderland Area is also reflective of land availability both quantitatively and qualitatively which is vital if the right sort of site is to come forward to promote family housing and halt out migration trends. Your own options clarify that brownfield development alone will not deliver the growth that is needed to meet RSS requirements and indeed via a 'sub area' approach urban regeneration can still be prioritised without stifling other suitable sites coming forward as part of a holistic strategy that meets all market needs and demands.</p> <p>I would still however just confirm with you that this option will allow both brownfield and greenfield development, potential use of open space should the ongoing audit provide justification for this, use of suitable non Green Belt open countryside ( other than for strategic employment purposes ) and provide a delivery focus which will need effective monitoring to ensure supply is maintained.</p> <p>In relation to the discussion on Strategic Sites I do agree with GONE that it needs to be robustly demonstrated that all of these are key to meeting objectives and ensuring the plan is sound. It is interesting to turn to PPS12 in this regard which states that:</p> <p>'to be 'sound' a core strategy should be justified, effective and consistent with national policy'</p> <p>Of most interest to the industry is the 'effective' part which the guidance goes onto advise as meaning that the document must be ' deliverable, flexible, able to be monitored' . This reflects the points made above and reinforces the need for Approach 4 to be delivery focussed.</p> <p>With this in mind I did not feel that all the sites meet the 'strategic site definition' whilst some sites clearly did e.g SSTC in association with Vaux and Groves. In other words these key components do more than 'wash their own face'. Rather they perform multi faceted tasks of opening up land to make it developable, acting as 'attractors' to change the perception of areas and stimulating growth. With this in mind I feel that it is simply illogical and working</p>	Comments noted
George Mansbridge	00002	South Tyneside MBC										<p>It is noted that all four alternative approaches include a strategic proposal to identify between 15-33 hectares of land in the Green Belt immediately to the north of Nissan up to the South Tyneside borough boundary for a new strategic employment site to provide for a range of large-scale employment uses. Approaches A and B also include options for longer-term housing development in the Green Belt to the north of Washington, with option B also including housing in one of the narrower sections of the Green Belt north of Fulwell / Carley Hill, all of which would be close to the South Tyneside boundary.</p> <p>It is understood that Sunderland's need to consider allocating this land results from the increased (housing and) employment land allocation requirement in the final Regional Spatial Strategy. Similar to South Tyneside's 30ha increase in our employment land allocation requirement, Sunderland's increase of 40ha was effectively the city's apportionment of the previously proposed 90ha prestige/strategic employment site that was originally being put forward in the draft Regional Spatial Strategy (and previous Regional Planning Guidance) for the Green Belt area between Sunderland, South Tyneside and Gateshead (with Gateshead receiving the remaining 20ha extra allocation).</p> <p>You will be aware that, following independent studies into where exactly the previously proposed 90ha prestige employment site should be located in the general area of search north of Sunderland, the most appropriate and sustainable location was recommended to be on the land to the south of the Fellgate estate in South Tyneside (north of the A184(T)). South Tyneside Council was consequently required to progress this regional strategic allocation through the council's draft Core Strategy and in parallel with a draft Area Action Plan for what became known as the Tyne Wear Park Regional Employment Site in 2005. However, following the Regional Spatial Strategy (RSS) examination panel's recommendation for this and other prestige employment sites in the Green Belt to be deleted from the RSS, the South Tyneside Core Strategy allocation was subsequently deleted in 2006 prior to adoption and the Area Action Plan was discontinued.</p> <p>It is therefore considered that the potential for any major Green Belt deletions should be more appropriately reviewed instead as part of the forthcoming single integrated Regional Strategy, before being proposed in any Core Strategy at the present time.</p> <p>It may be useful to also bear in mind that South Tyneside Council has recently discussed the issue of difficulties in identifying sufficient land to meet its own increased RSS housing and employment land allocation requirements without incurring any Green Belt deletions with ONE North East and the Association of North East Councils (ANEC). South Tyneside Council has been advised that it may be reasonable and justifiable to under-allocate for employment land by up to 5-10ha if there is evidence of at least an equivalent amount of premises that have become vacant since 2005 (which is when the RSS employment land figures run from).</p> <p>As regards housing, it can be taken into consideration that Planning Policy Statement 3 'Housing' advises that +/-10-20% is considered to be a reasonable range of deviation from the RSS-based trajectory. Under-allocating for housing by up to 20% below the RSS allocations may therefore be an appropriate strategy to consider, particularly with view to the new Regional Strategy's likely reassessment of allocations more in line with land availability as informed by the region's Strategic Housing Land Availability Assessments (SHLAA).</p>	Comments noted on housing. Regarding the proposed major Green Belt deletion at the North Nissan site, it was considered prudent to make the hard decision now, rather than wait for the integrated Regional Spatial Strategy. The need for a site north of Nissan is supported by the Employment Land Review 2009 which recommends the need to identify a strategic employment site in the Washington area. The Government announcement for the low carbon economic area puts Sunderland/Nissan at the heart of this designation to support low carbon technologies and vehicle production.

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Amanda Healy	01446	NHS South of Tyne and Wear										<p>In relation to improving health and well-being, the four approaches have been assessed. However, it is difficult to understand the criteria or method has been utilised to describe the impact.</p> <p>Could you please provide this in more detail? Currently it has been assessed that one of the options may have an effect on improving health but not significantly.</p> <p>Healthy City is a key priority within Sunderland Community Strategy. It is therefore important to ensure every opportunity to impact positively and mitigate against any negative impact on health, be considered.</p>	<p>The criteria used to assess the impact on health is detailed in the Sustainability Appraisal Framework and is as follows: Promote Inclusiveness and reduce health inequality, decrease the causes of ill health (especially long term), increase access to local health care provision, provide access to safe, green and open spaces for activity, promote sport, exercise, active recreation, and opportunities for physical activity in everyday life.</p>
Vikki Harvey	01449	Equality and Human Rights commission										<p>We are sure you will appreciate that the Equality and Human Rights commission (ECHR) receives many such documents. Unfortunately we will not be participating and making any comments at this time</p>	No response required
Maureen Byram	1455											<p>With reference to the development plan proposed by Sunderland City Council. It would appear that they plan to ignore the Green Belt protection and, in consequence, to remove our home, together with five others, the public house the 'Three Horse Shoes' and the North East Aircraft Museum. The only other resident upon the site lives in a mobile home which was towed on to this site and, presumably, could be towed elsewhere. There are no other people here, and, as such, we do not have a heavy hand to play.</p> <p>We even have some claim to history. Our homes were built to house RAF officers. Some were billeted at the 'Three Horse Shoes' and were flying spitfires during WW2. We even have a large bunker - or air raid shelter - still intact - underneath our back garden, which was for the protection of the Officers and staff in the cottages. Would asking any of the historical societies for help be helpful? The fields surrounding us were full of barracks etc which housed the troops protecting the airfield and crop markings in a dry summer show the extent of the development.</p> <p>Could you please advise us as to the limits placed on development on Green Belt sites. Do we have any protection? Or is it a case of what Nissan wants, Nissan gets? We have lived here for 30 years and even had to fight to get a change in windows, purely because of all the restrictions applying to Green belt Regulations. It would appear to be money overrules all.</p> <p>I'm sure that you will appreciate that this situation is extremely worrying to us and our neighbours. We feel that we will just be walked over with regard to planning and any objections and would appreciate any advice or help which you could give to us.</p>	<p>A response was sent by the Planning Policy Manager on 28th January 2010. The requirement for a new employment site to the north of Nissan has been informed by a recently completed review of all land allocated for economic development and future employment requirements of the city. The Employment Land Review (ELR) recommended that there is a shortfall of strategic employment land in the Washington area. A strategic development site needs to be of a size able to accommodate new development and associated infrastructure. The review recommended the size of the site to be approximately 30-40ha. A potential site was identified in the Review in the general locality of north of nissan. The Core Strategy Alternative Approaches consultation proposed the site on the basis that the site offers the potential for future economic development that may support the new generation of low carbon industries located close to Nissan and also the adjacent road network.</p>
Councillor Wakefield	712											<p>The document pre-judges the outcome in the Strengths and Weaknesses section, these are entirely subjective and should be a result of the consultation, not as presented as fact rather than officer opinion. The options as presented are contrary to the recent RSS, which identifies the Coalfield towns of Houghton le Spring and Hetton le Hole as stand alone regeneration towns in the Durham Coalfield. This consultation appears to be an attempt to circumvent this output of the RSS.</p> <p>The consultation document is not focused enough, the questions it asks are too broad to make a reasoned judgement for example possible intrusions into Green Belt and Open Space are not defined. If the possible intrusions were better defined, a more constructive response would be possible and therefore more useful.</p> <p>The document fails to recognise the employment benefits of the Green Belt, which a large proportion is agricultural land and as such, provides vital food supplies.</p> <p>The impact on inter-county travel to work is not fully considered even the minutes of the meeting held on the 5th November show a presumption of work travel toward Sunderland, this is not the case. Much work travel from Houghton and Hetton is toward Durham, Peterlee, Washington, Gateshead and Newcastle. I feel this needs to be better understood and if necessary better researched for both outward and inward work travel</p> <p>Recent restoration of brown field sites such as Herrington Country Park, Rainton Meadows and the on-going Lambton Coke Works to name just the major schemes have not generated any significant employment land, despite their previous use. This needs to be reviewed in much more detail and consideration of incubator and small starter units on at least part of these sites considered.</p>	<p>The Core Strategy is required to be in general conformity with the RSS. The approaches defined were considered to be the most reasonable and realistic working within the broad spatial parameters and requirements of the RSS.</p> <p>The Core Strategy cannot be site specific. References to Green Belt intrusions as shown on the maps are deliberately not drawn to scale, they represent in diagrammatical terms how the four different approaches presented could be delivered.</p> <p>Comments noted</p> <p>The Employment Land Review 2009 has assessed all existing employment allocations to determine long term viability and provides information regarding future employment needs. The emerging Economic Master Plan will also consider how the wider employment agenda can be delivered.</p>