

**WEARMOUTH MASTERPLAN AND DESIGN CODE: SUPPLEMENTARY
PLANNING DOCUMENT**

REPORT OF THE DEPUTY CHIEF EXECUTIVE

1.0 Purpose of Report

- 1.1 The purpose of this report is to advise Committee of the responses received following public consultation on the Wearmouth Masterplan and Design Code Supplementary Planning Document and to seek Committee's comments on the revised document.
- 1.2 The Committee's comments will be reported to Cabinet on 15 February 2012 when agreement will be sought to approve the Wearmouth Masterplan and Design Code as a Supplementary Planning Document (SPD).

2.0 Background

- 2.1 Alteration Number 2 to the Unitary Development Plan (UDP) was adopted by the City Council in September 2007. It establishes planning policy for Central Sunderland including the designation of a number of 'Strategic Locations for Change', including one, defined in Policy NA3B.1, on the north bank of the River Wear at the Bonnersfield and St. Peter's riverside. This Strategic Location for Change is indicated on the plan in Appendix 1 to this report.
- 2.2 Policy EC5B of UDP Alteration No.2 requires the preparation of a broad framework document for each of the Strategic Locations for Change sites identified in that Plan. The framework is required to set out key principles to be taken into account by developers in preparing detailed masterplans for development. The Wearmouth Masterplan and Design Code SPD has been prepared to satisfy this requirement.
- 2.3 The boundary of the SPD has been purposely drawn to coincide with the buffer zone of the candidate World Heritage Site at Wearmouth (see plan in Appendix 1). The buffer zone is the area within which it is reasonable that archaeological remains of the monastery of St Peter's and its estates might remain, and was agreed by all relevant partners at an early stage in the preparation of the World Heritage Site bid.
- 2.4 The SPD is intended to guide development within the buffer zone to ensure that the Outstanding Universal Value (see Appendix 2) of the candidate World Heritage Site at Wearmouth is protected and enhanced.

- 2.5 Following previous statutory public consultation, an earlier version of the document was redrafted to take account, in particular, of concerns raised by English Heritage, including giving increased emphasis to the need to protect and enhance the Outstanding Universal Value (see Appendix 2) of the candidate World Heritage Site at Wearmouth.
- 2.6 At its meeting in September 2011 Cabinet approved the redrafted Wearmouth Masterplan and Design Code Supplementary Planning Document (SPD) for the purposes of statutory consultation as part of the process leading to formal adoption of the SPD by the council.
- 2.7 The SPD has been the subject of a four week public consultation in accordance with the provisions of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended), between 9 November and 7 December 2011.
- 2.8 Statutory consultees and other relevant organisations were formally consulted by letter. Copies of the SPD were available for inspection at all libraries in the city and the council's Customer Service Centre at Fawcett Street, with information on how to comment. Letters were also sent to properties within and immediately adjoining the SPD boundary, advising residents about the consultation, where to see the document and how to comment. All the relevant information relating to the consultation was available online at www.sunderland.gov.uk/stpeters, where responses could also be submitted. A formal public notice publicizing the consultation was published in the Sunderland Echo on 8 November 2011.

3.0 Consultation responses and changes to the SPD

- 3.1 Appendix 3 to this report sets out the comments received during the statutory public consultation, the council's response to those comments and any resulting changes to the final version of the SPD document.
- 3.2 Many of the comments have been answered without the need to make changes to the document. Others – for example comments from English Heritage, the University of Sunderland, Environment Agency, Northumbrian Water and Nexus – have been dealt with by making minor amendments or additions to the document.
- 3.3 A summary of the key responses is set out below.
- 3.4 English Heritage was generally supportive of the document and, where considered appropriate, their suggested changes have been incorporated. Many of their comments, however, were matters of opinion relating to the structure and form of the document which, if accepted, would require a further significant redrafting of the document and further delay its consideration for adoption. As the document is required to be submitted to the International Council on Monuments and Sites (ICOMOS) by the end of February as part of the final package of information in respect of

the World Heritage Site bid, any further delay could seriously compromise the bid. It is considered that English Heritage's comments have been accommodated as far as practicable.

- 3.5 The University of Sunderland – a major landholder at St Peter's – generally welcomed the revised document and the positive dialogue that had preceded its production. Several of the University's comments related to matters that will more properly be dealt with at the detailed design stage when development proposals are brought forward (service access, parking provision and so on). Some minor changes have been made to reflect acceptance of their comment that the document appeared to require the justification of student accommodation (if proposed) when this use was already established as acceptable in higher level planning policy (policy NA3B.1 of UDP Alteration No.2).
- 3.6 Metnor Properties – the joint-owner of land at Bonnersfield – submitted comments expressing disappointment with several aspects of the SPD insofar as it relates to the land they own at Bonnersfield. However, most of their comments were based on their view that their own development proposals – re-submitted in rough sketch form with their comments – should be replicated in the SPD. Although their development aspirations have been acknowledged as far as possible, the SPD must be seen to establish development principles free from the direct influence of interested parties. The uncritical inclusion of Metnor's development proposals in the earlier draft of the SPD was the subject of significant criticism levelled at the document by English Heritage. Accordingly, it has not been possible to accommodate most of Metnor's suggested changes to the document.
- 3.7 The Environment Agency raised some specific issues relating to the creation of a landscaped riverside buffer, separating the river from new development, and a suggestion that opportunities should be explored to restore the river to a more natural channel by removing the 'engineering solutions' which currently line the river banks. Neither suggestion is considered to be a practical proposition in view of development that has already occurred, including the creation of a hard landscaped promenade on the north shore. The restoration of the river to a more natural channel would expose significant parts of the area to flood risk which is currently prevented by the man-made structures which line this stretch of the river.
- 3.8 The Environment Agency and Northumbrian Water Limited both noted references in the document to the desirability of incorporating sustainable urban drainage systems in new development. They recommended that this should be expressed as a requirement and the document has been amended accordingly. A similar request from Northumbrian Water to include a duty to incorporate measures to reduce water consumption and increase recycling has also been reflected in amendments to the document text.

- 3.9 Nexus made comments regarding the desirability of creating an east-west route through the SPD area on the north shore, south of Dame Dorothy Street, as a means of increasing public transport penetration. It is not clear how this can be achieved, given the presence of St Peter's Church and grounds at the heart of the area, the general topography of the area and its relationship with Dame Dorothy Street. In addition, Nexus questioned the financial viability of a ferry crossing (a longer term aspiration) and suggested that the extension of existing bus routes would be a preferable solution, with a low level bridge the ultimate solution in the future. It is considered that the creation of a ferry crossing could bring with it other benefits and should not be dismissed as an aspiration. Accordingly it is not proposed to change the document in respect of either of the above issues.
- 3.10 The Sunderland Heritage Quarter Project submitted a comprehensive response, made up largely of observations about the content of the SPD. The specific issues raised in the response have been answered without requiring changes to the document, with the exception of one minor text correction and a change to the document which was also a response to a comment from English Heritage (the inclusion of a cross-section to demonstrate the acceptable relationship between St Peter's Church and proposed surrounding development).
- 3.11 Four responses were received from members of the public – one by email and 3 online responses via the dedicated webpage. Two respondents objected to the SPD (though only one gave reasons), one supported it and one indicated neither support nor objection. Two of the responses were accompanied by various comments, none of which required changes to the document.
- 3.12 In the interests of clarity and brevity the title of the document has been shortened to Wearmouth Masterplan and Design Code. The previous title – Wearmouth candidate World Heritage Site Masterplan and Design Code – was considered potentially ambiguous and misleading. Clear reference is contained within the document regarding its purpose and relationship to the candidate World Heritage Site.
- 3.13 A copy of the amended SPD document is available for inspection in the Members' rooms.

4.0 Reasons for decision

- 4.1 The adoption of the Wearmouth Masterplan and Design Code as a Supplementary Planning Document (SPD) will help facilitate the proper planning and regeneration of the buffer zone to the candidate World Heritage Site at Wearmouth, in accordance with the over-arching planning policies for the area. The SPD will provide a robust mechanism for protecting the Outstanding Universal Value of the cWHS. It will be used by developers as a basis for preparing detailed proposals for the buffer

zone and will be afforded significant weight as a material consideration when determining future planning applications.

5.0 Alternative options

- 5.1 The alternative option is not to adopt the masterplan and design code as an SPD. The consequences of this would be a failure to meet the requirement set out in the adopted UDP Alteration No.2 policy ECB5 to prepare a broad framework for each Strategic Location for Change. In addition, failure to adopt the masterplan and design code will reduce the council's ability to ensure a high quality of development in the masterplan area and to protect and enhance the setting and Outstanding Universal Value of the prospective World Heritage Site. The lack of such an adopted planning document could be detrimental to the Wearmouth-Jarrow Partnership's bid for inscription of the site on the World Heritage Register.

6.0 Relevant considerations

- 6.1 Financial implications - there are no direct financial implications for the Council arising from the adoption of the amended Supplementary Planning Document.
- 6.2 Legal Implications - The adoption process for the Masterplan and Design Code has been carried out in accordance with the requirements of the Town and Country Planning (Local Development) (England) Regulations 2004 (as amended). Following adoption as a Supplementary Planning Document, the Masterplan and Design Code will be a material consideration in the determination of planning applications for new development in the candidate World Heritage Site buffer zone.

7.0 Recommendation

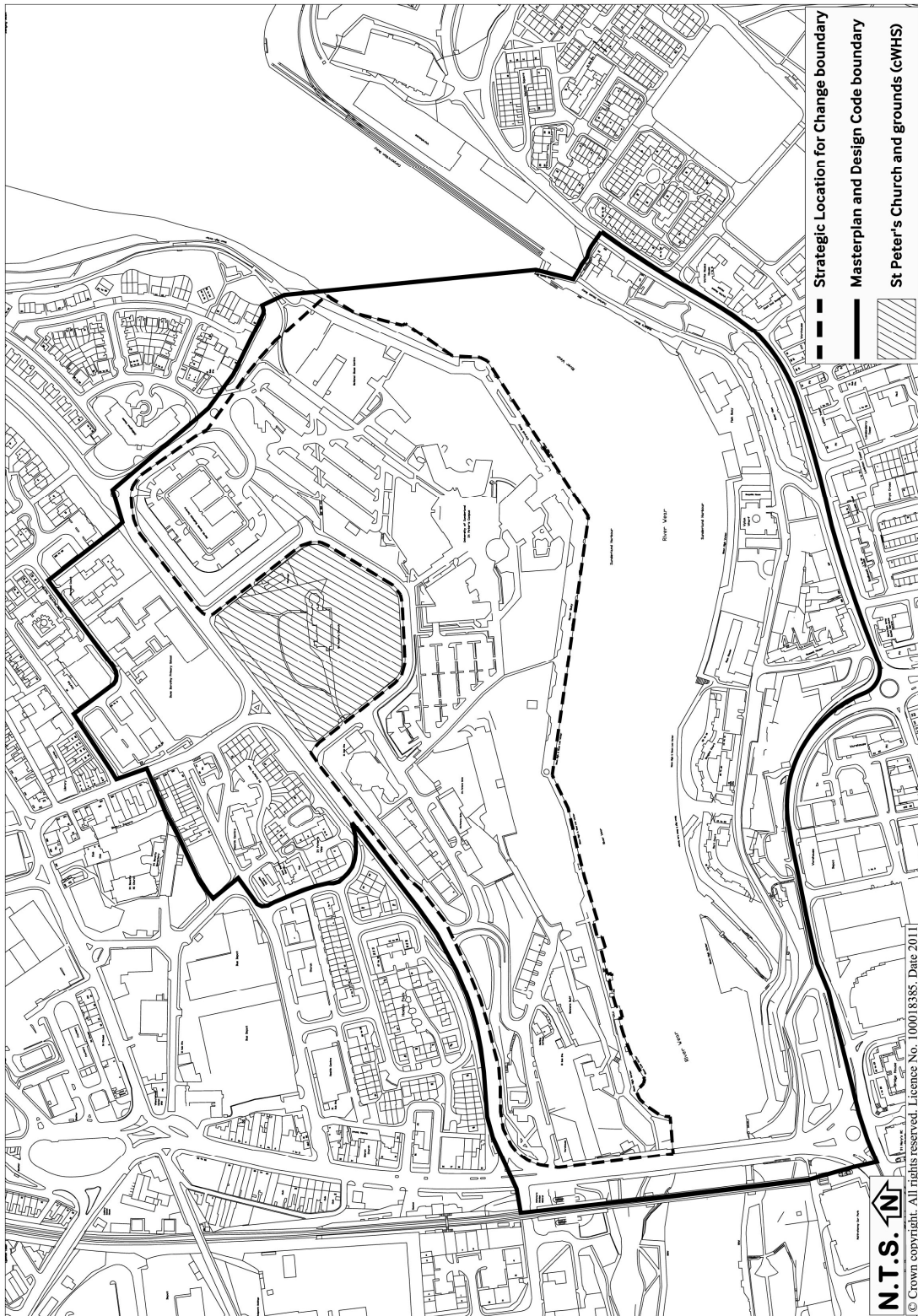
- 7.1 Committee is recommended to consider the amended Wearmouth Masterplan and Design Code and refer its comments to Cabinet for consideration.

8.0 Background Papers

- Report to Cabinet, March 2010: St Peter's Riverside and Bonnersfield Planning Framework Draft Supplementary Planning Document
- Report to Cabinet, September 2011: Wearmouth candidate World Heritage Site Masterplan and Design Code (formerly St Peter's Riverside and Bonnersfield Planning Framework): Supplementary Planning Document
- The Unitary Development Plan (Adopted Plan) 1998

- Unitary Development Plan Alteration No.2
- Wearmouth Masterplan and Design Code Draft Supplementary Planning Document and Strategic Environmental Assessment.

Appendix 1
Boundaries of Wearmouth Masterplan and Design Code Supplementary
Planning Document and St Peter's Riverside and Bonnersfield Strategic
Location for Change



Appendix 2

The Outstanding Universal Value of the Wearmouth - Jarrow candidate World Heritage Site (cWHS)

Outstanding Universal Value (OUV) is a general statement of why a place is important which, in itself, can be difficult to use directly for day-to-day management.

The attributes of OUV are its more specific expressions. These can be used to define the need for management actions in order to sustain OUV. They can define the potential impact of proposed changes or developments, or the state of a Property's authenticity and integrity.

Five tangible attributes have been developed which express the OUV of Wearmouth-Jarrow cWHS:

- The relationship between the twin monasteries and their respective estuarine sites
- The standing (above-ground) remains of the Anglo-Saxon monastic building complexes
- The in situ excavated remains of the Anglo-Saxon monastic building complexes
- The monastic plan
- Further archaeological remains

Two associative attributes substantially augment understanding of the OUV of the Property:

- The legacy of knowledge and understanding derived from the work of the monastery
- The rich combination of the in situ, portable and documentary evidence

END

Appendix 3

Wearmouth Masterplan and Design Code Supplementary Planning Document Statutory public consultation 9 November – 7 December 2011

Schedule of responses

Respondent	Comments	Proposed action / changes to SPD document
Statutory consultees		
Association of North East Councils (ANEC)	Since the decision by DCLG to abolish work on the Regional Strategy, which took effect in September 2010 ANEC no longer has staff dealing with planning matters.	Comments noted. No action required. No changes proposed.
English Heritage	<p>1 The document follows on from positive discussions held between English Heritage and Sunderland City Council which heralded a distinct shift in approach and emphasis following our response to the earlier draft consulted upon last year.</p> <p>2 The latest draft continues with the approach we discussed and we are pleased to note and welcome the extent to which the focus of the document now lies with the pre-eminence of St Peter's Church at the heart of the nomination for World Heritage Site status for the twin monastery at Wearmouth and Jarrow in South Tyneside.</p> <p>3 Some care needs to be taken with the title of the SPD. If it is to include reference to the cWHS, as we believe it ought, it should be given its full and proper title – <i>Wearmouth and Jarrow Candidate World Heritage Site</i>.</p> <p>4 At the outset the document makes clear that it is intended to safeguard and celebrate that which constitutes the Outstanding Universal Value of a site considered to be deserving of World Heritage Site status. The Vision and</p>	<p>1 Comments noted. No action required. No changes proposed.</p> <p>2 Comments noted. No action required. No changes proposed.</p> <p>The change to the title suggested is considered to be no less ambiguous than the former title – the document is not a masterplan affecting the Jarrow site. However, in the interests of clarity and brevity, the title of the SPD has been shortened to remove specific reference to the candidate World Heritage Site (cWHS). Clear reference to the purpose and relationship of the SPD to the cWHS is contained within the document. Title of document changed to Wearmouth Masterplan and Design Code.</p> <p>4 Comments noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>English Heritage cont.</p>	<p>Objectives for the SPD give pride of place to conserving and enhancing the internationally important heritage within the study area. This we welcome.</p> <p>5 Thereafter, unfortunately, the document is somewhat lengthy and repetitive and in places prone to rather too much technical urban design language which, depending on your intended audience, could perhaps be scaled back. St Peter's-Bonnorsfield is described as an area where, rather confusingly, every aspect is to be invested with great significance, be it a 'quarter', 'gateway', 'node', 'landmark', 'feature building' etc. In some instances the descriptions appear to be mis-applied – for example where 'gateways' exist at the very centre of the area.</p> <p>6 The document extols the virtues of mixed use development, which we wholeheartedly support, referring to what are described as 'character areas' or 'quarters'. In reinterpreting the pre-existing University Masterplan and reshaping the planning proposals for the Metnor-Akenside development, however, the result remains one of land use zoning. We would therefore encourage the council to be more aspirational and to aim for a more genuine mix of uses throughout the SPD area, particularly within component blocks and even individual buildings.</p> <p>7 In relation to point (6) above we feel that the document needs to more clearly express the <i>Vision</i> or concept for each sub-area, using readily accessible and understandable language to explain in a succinct statement how each will both feel and function.</p>	<p>5 It is acknowledged that the document may appear repetitive when read in its totality. However, it is intended to be used as a toolkit by developers, architects, urban designers etc. (that is, a technical audience who will understand how it is intended to be used and interpreted). All the relevant information for each character area is contained in the section relating to that area, rather than having to constantly cross-reference other parts of the document. Comments noted. No action required. No changes proposed.</p> <p>6 It is considered that the document supports and encourages a mix of uses, in accordance with the acceptable uses identified for the area in the UDP Alteration No.2 policy NA3B.1. It clearly defines the range of uses appropriate to each character area. However, there has had to be some acknowledgement of the purpose, interests and aspirations of the relevant landowners particularly on the north shore which will inevitably influence the mix of uses brought forward in future development proposals on their land – for example development by the University will clearly result in broadly education-related buildings. Additional paragraph added to page 52 to add further emphasis and encouragement to developers to secure a mix of appropriate uses in development proposals.</p> <p>7 It is considered that the relevant text for each character area adequately sets out how each will 'feel and function'. To add vision statements for each area will further lengthen the document and introduce another element of repetitiveness which English Heritage have already noted as a criticism (see 5 above). In addition, to introduce new vision statements at this stage of the document production process could be considered to be fundamental changes to the document upon which consultees and stakeholders have not had the opportunity to comment. Comments noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>English Heritage cont.</p>	<p>8 Following sound masterplanning principles which adopt a more legible and intuitive approach, the detailed manner in which the document is set out could be improved were consideration of the network of streets and spaces – layout, access, movement etc. – to precede detailed guidance on the treatment of the buildings and spaces themselves.</p> <p>9 It is apparent that a Landscape Strategy is being devised for the SPD area in parallel with this masterplan and design code. Landscaping is a crucial and integral component of good design and should be considered together with the guidance within this document. Whilst it is acceptable for the detailed specification for the landscaping to be left to a later date, it is imperative that the landscaping concept is considered in tandem with, and as an integral part of, this document. How spaces are used and treated cannot be separated out from how they relate to their built surroundings. It can even help decide how high buildings might/ought to be within their context.</p> <p>10 The indicative building heights shown on page 70 are at odds with the text and the illustrations, especially that shown on page 76. These discrepancies should be resolved in order to remove ambiguity. By and large building heights should correspond to the topography, rather than working against it – the buildings should accentuate and respond to the fall towards the river.</p> <p>11 The impact of suggested building heights could be better understood were cross-sections to be provided, especially along key views and in relation to St Peter's church but also in relation to the conservation area on the</p>	<p>8. The document has been prepared and structured with reference to design codes identified as 'best practice' by the former Commission for Architecture and the Built Environment (CABE) and follows design code guidance. The suggested improvement would require significant redrafting of the document resulting in further delay to its consideration for adoption. Comments noted. No action required. No changes proposed.</p> <p>9. It is considered that the SPD document correctly provides the over-arching planning framework to guide the preparation of the more detailed landscape strategy. The suggested improvement would require significant redrafting of the document resulting in further delay to its consideration for adoption. Comments noted. No action required. No changes proposed.</p> <p>10. Building heights have been carefully considered in the preparation of the document. However, there is a need to consider realistic, viable building forms in dealing with the topography of the area. It is not accepted that the building forms should directly follow the topography – the result could be a weak architectural form of development producing a hotchpotch of building and roof heights detracting from views of the cWHS. The illustrations of the development potential of the area show simple, practical building forms (though not without scope for architectural innovation) which draw the eye to the focus of the area, that is the cWHS.</p> <p>It is acknowledge that some greater clarity may be required regarding building heights. Note on page 69 regarding the measurement of building heights relative to ground level has been slightly amended and given greater prominence.</p> <p>11 The limit on building heights around St Peter's Church was agreed in previous discussion with English Heritage and incorporated in the masterplan. Together with other requirements contained in the document this will ensure that</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>English Heritage cont.</p>	<p>south shore, as well as across the river from one bank to the other. Without further evidence to demonstrate otherwise, some building heights appear excessive in relation to the Church and key views to and from it.</p> <p>12 Within the immediate vicinity of the SPD study area is a number of established residential communities. There is little in the document, or elsewhere, to suggest that these communities have been actively engaged in the planning process, or have been given the opportunity to shape the design of major developments within the area. Residents to the north of the Metnor-Akenside development site might, for example, have more than a passing interest in the form it might take and how it might impact upon the way they might access the river and the amenity they currently enjoy.</p> <p>13 Sections of the document setting out the historic context and the cultural significance of the study area should be checked carefully against the [cWHS] Nomination Document and the Conservation Plan for synchronicity.</p>	<p>building heights do not compromise the setting of the church.</p> <p>The use of cross sections can themselves be misleading as they tend to present an expanded view which can not be seen in reality. It is considered that the extensive use of modelled 3-dimensional views in the document provides a more realistic impression of the likely appearance of development.</p> <p>However, it is acknowledged that a cross-section relating to St Peter's Church and grounds and potential development around it may be useful. Cross section incorporated in the document at page 69 to demonstrate the likely relationship between St Peter's Church and potential surrounding buildings and that those building heights are not excessive.</p> <p>12 Residential communities immediately adjacent the cWHS buffer zone have been consulted as part of both this and the previous statutory public consultation exercise. Letters were sent to all residential properties adjacent the buffer zone, informing them of the consultations, where to see the relevant documents and how to comment on them. Few responses were received from local residents during either consultation. Comment noted. No action required. No changes proposed.</p> <p>13 It is considered that the SPD accurately reflects the Nomination Document and the Conservation Plan</p>
<p>Environment Agency</p>	<p>Land Contamination Unfortunately, there is no mention of land contamination as an issue to be considered in the SPD in the 'Other Issues' section (Section 4.8). The risks from land contamination associated with current and historic land uses within the area should be assessed and addressed as part of any proposed development, and we therefore consider that land contamination should be flagged up as</p>	<p>It is considered that much of the land on the north shore was remediated during land reclamation works by the former Tyne Wear Development Corporation to prepare the area for redevelopment. However it is acknowledged that both this and other areas may still be subject to contamination and that the document should be amended to reflect this. Comment noted; document amended with addition of paragraph</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Environment Agency cont.</p>	<p>an 'Other Issue' for consideration within this SPD.</p> <p>The previous draft identified the sensitivity of the area (Magnesian Limestone Principal Aquifer) to pollution, and we would recommend this is again included in this version, for example within the identification of issues associated with the SPD area.</p> <p>We do note that Page 101 of the updated SPD requires development to address contamination issues, and acknowledge and agree with the proposed approach to contamination outlined on this page.</p> <p>We recommend that under the fourth bullet point in the 'Opportunities' section on page 34, reference is made to the opportunity presented by development proposals to remediate contamination associated with brownfield sites, to support the proposed approach to dealing with contamination.</p> <p>Biodiversity The SPD recognises the need to enhance biodiversity under the 'Other Issues' section, which we support. However, we consider that the final phrase under the biodiversity heading should read "protect and enhance", as not only designated sites of nature conservation importance need to be protected – new developments should protect all features of biodiversity importance, as well as seeking to enhance biodiversity.</p> <p>In our original response, we recommended the establishment of buffer zones alongside the River Wear, to act as wildlife corridors linking habitats and providing routes for animals and plants. We stated that we would wish to see policies incorporated within the plan which aim to protect the environment and promote the enhancement of the riverside area. We wish to re-iterate this comment, as the promotion of a riverside buffer zone is not apparent in the current draft. We do acknowledge that on page 46, the SPD recommends that opportunities for dense informal planting are explored in areas which are inappropriate for</p>	<p>regarding potential contamination (Other issues, page 32).</p> <p>Comment noted; document amended with addition of paragraph regarding sensitivity of controlled waters to pollution (Other issues, page 32)</p> <p>Comment noted. No action required. No changes proposed.</p> <p>It is considered that this is a matter that will be dealt with as development proposals come forward and will be dealt with as part of any planning application and the information that will be required to accompany it. Comment noted. No action required. No changes proposed.</p> <p>Comment noted. Text amended on p32 to incorporate additional wording.</p> <p>It is considered that the plan on page 91 of the SPD and associated text deals with the creation of linked areas of landscaping / wildlife habitats, in addition to the references acknowledged on page 46. These aim to reinforce the existing landscape corridor rather than artificially creating isolated new habitats. It should also be noted that hard landscaping up to the river's edge already exists in the form of the riverside structures and walkways on both sides of the river. Much re-development has already occurred in close proximity to the river's edge and it would not be possible to create a continuous 'buffer zone' as seems to be suggested. Comment noted. No action required. No changes</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Environment Agency cont.</p>	<p>development, “to support the green corridor which runs along the route of the River Wear”, but feel that this sentiment should be given much greater weight in the SPD. Plans and the images of development along the riverside makes no reference to such areas, and it is notable that the images of development within the proposed quarters portrayed throughout the Design Code sections show hard landscaping right up to the river’s edge.</p> <p>We consider the promotion of a riverside buffer zone to be important for a number of reasons. For example, Article 10 of the Habitats Directive stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats, and promote the expansion of biodiversity. Such networks may also help wildlife adapt to climate change.</p> <p>Moreover, the Water Framework Directive aims to restore nature conservation value where it has been lost – in the SPD area, previous engineering solutions and industrial development have given rise to the current structures on the riverside. In line with this Directive, opportunities should be explored for restoring or enhancing the watercourse to a more natural channel wherever developments are planned for the riverside.</p> <p>In addition, creating a buffer zone along the River Wear would enhance the value of the river corridor. It also prevents piecemeal development and token habitat creation which may serve limited function because of, for example, isolation. Master planning green infrastructure over the whole SPD area will also highlight more sensitive/important wildlife areas, as sites which may benefit from less intensive built development. This has been addressed in the SPD in relation to some sites of established planting within the area, i.e. steep slopes, but not in relation to the river corridor. We therefore recommend that the establishment of a riverside buffer</p>	<p>proposed.</p> <p>As above. Comment noted. No action required. No changes proposed.</p> <p>This would seem to suggest removing retaining structures from the riverside to allow the river to revert to its natural course, which in any case has been altered over several centuries as a result of riverside activities, the creation of ballast hills and other forms of land reclamation. This would also imply exposing much of the surrounding area, some of it already developed, to flood risk – at present the area is not at risk of flooding because the river is constrained within bank (albeit man-made) through the SPD area. This is not considered to be a practical or desirable proposition in view of the area’s status as a focus of regeneration. Comment noted. No action required. No changes proposed.</p> <p>It is considered that, because of existing development, the creation of new habitat would be piecemeal and isolated. The creation of a riverside ‘green buffer zone’ is not considered practical because of existing riverside structures, including a wide promenade along the north shore, and buildings. The SPD aims to reinforce the existing landscape corridor and establish links where possible between landscaped areas. Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Environment Agency cont.</p>	<p>zone is given greater emphasis throughout the SPD.</p> <p>Flood Risk The SPD also addresses flood risk under ‘Other Issues’ (Section 4.8), identifying that development which increases surface water run-off could lead to flooding. We consider that this should be clarified to read “Development <u>should not lead to</u> any increases in surface water run-off, as this could lead to increased flood risk”.</p> <p>In relation to the statement in Section 4.8 that development should incorporate SUDs, we wish to re-iterate our previous comments on the previous draft of this SPD. We stated that the SPD should <u>require</u> SUDS to be incorporated into any new development, as they should be utilised throughout the plan area to reduce surface water flooding. SUDS offer significant advantages over conventional piped drainage systems in reducing flood risk by attenuating the rate and quantity of surface water run-off from a site, promoting groundwater recharge, and improving water quality and amenity. The variety of SUDS techniques available means that virtually any development should be able to include a scheme based around these principles. This can include soft landscaping associated with both new buildings and retro-fitting existing buildings, such as green roofs.</p> <p>We also previously outlined the need for a sequential approach to development. It is however recognised that no development areas are at risk of tidal or fluvial flooding, so there is no requirement for this to be raised within the SPD.</p> <p>In terms of planning requirements, we previously commented that development on individual sites over 1 hectare in size would need to be accompanied by a Flood Risk Assessment (FRA). Although this is not referred to in relation to the Design Codes for each individual site, we note that Page 101 requires development proposals to be accompanied by a FRA and/or DIA, and we acknowledge and agree with the proposed approach to assessing flood risk outlined on this page.</p>	<p>Comment noted. Text amended on p32 to incorporate additional wording.</p> <p>Comment noted. Text amended on p32 to incorporate additional wording to require Sustainable Urban Drainage Systems (SUDS) to be incorporated in new development.</p> <p>Comment noted. No action required. No changes proposed.</p> <p>Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Environment Agency cont.</p>	<p>Proposed River Crossing Page 31 describes the proposals for a new ferry crossing or a new footbridge between the north and south banks of the Wear. Such proposals, i.e. development within 5 metres of, or over, the Main River, should be discussed as early as possible with the Environment Agency, and will require a Land Drainage Consent from us in accordance with the Water Resources Act 1991.</p> <p>In particular, careful consideration should be given to the proliferation of new river crossings in relation to the cumulative adverse effects on the ecology of the watercourse. The design and construction of the bridge should have minimal impact on the ecology of the river environment, and we would therefore recommend that a 'clear span' design with abutments set back from the watercourse on both banks is promoted. Any new bridge would also need to take flood risk into account and be raised above the 1 in 100 year flood level plus a climate change allowance. It would need to be designed so as not to exacerbate flood risk.</p>	<p>The footbridge is acknowledged as aspirational and likely to fall outside the timescale of the SPD. Details of any such proposal, or development associated with a new ferry crossing, will be resolved at the appropriate time and involve early liaison with the Environment Agency. Comment noted. No action required. No changes proposed.</p> <p>The footbridge is acknowledged as aspirational and likely to fall outside the timescale of the SPD. Details of any such proposal will be resolved at the appropriate time and involve early liaison with the Environment Agency. Comment noted. No action required. No changes proposed.</p>
<p>Northumbrian Water (pp England & Lyle)</p>	<p>We would reiterate our previous comments on the St Peter's and Bonnersfield Riverside Planning Framework Draft SPD relating to the historic context of the SPD and this part of Sunderland i.e. that the water and sewage infrastructure including the sewerage network and pumping stations are largely geared towards meeting the needs of the existing and previous industrial uses along the river corridor. The ongoing change in character and mix of land uses in this part of the city may therefore require the upsizing, replacement or rationalisation of existing infrastructure, at substantial cost, to ensure it properly meets the changing demands placed upon it by new forms of development. NWL encourages and welcomes early consultation by developers to ensure that key drainage and sewerage issues are taken into account in early design stages.</p> <p>Chapter 9 – Design Code NWL is disappointed to note there is no explicit reference in chapter 9, which deals explicitly with the design code for</p>	<p>Developers will be made aware of the need to consult Northumbrian Water about proposals at the earliest opportunity. Comment noted. No action required. No changes proposed.</p> <p>This issue has been dealt with in response to comments made by Environment Agency, above. Comment noted. Text</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Northumbrian Water cont.</p>	<p>the SPD, to a requirement for developers to adopt a SUDS based approach to the design of drainage systems serving proposed development, nor to a requirement to promote designs aimed at minimising water use and the reuse/ recycling of water within developments. These are key design principles/considerations. The only reference we have been able to identify in chapter 9 Design Code is on page 94 where passing reference is made to the fact that green spaces within the site can be used to “provide suitable mechanisms to address issues with urban drainage.</p> <p>It is recognised that a requirement to incorporate SUDS into new development is given on page 102 in chapter 10 implementation but NWL considers this is inadequate and that the SPD should be amended to make sure that reference to SUDS are prominent within the key Design Code section of the SPD rather than in the ‘small print’.</p> <p>This also applies to the need to promote water conservation and reuse/recycling measures in new development. The reference on page 104 only requires that developers should “investigate the potential” for measures to reduce water consumption and recycling. NWL does not consider that this is expressed strongly enough and there should be a positive duty to incorporate such measures where feasible.</p>	<p>amended on p32 to incorporate additional wording to require Sustainable Urban Drainage Systems (SUDS) to be incorporated in new development.</p> <p>This issue has been dealt with in response to comments made by the Environment Agency, above. Comment noted. Text amended on p32 to incorporate additional wording to require Sustainable Urban Drainage Systems (SUDS) to be incorporated in new development.</p> <p>Comment noted. Text on page 104 amended to reflect Northumbrian Water’s concerns.</p>
<p>National grid</p>	<p>No specific comments.</p>	<p>No action required. No changes proposed.</p>
<p>South Tyneside Council</p>	<p>Support adoption of the document.</p>	<p>No action required. No changes proposed.</p>
<p>The Coal Authority</p>	<p>No specific comments.</p>	<p>No action required. No changes proposed.</p>
<p>Homes and Communities Agency</p>	<p>No specific comments.</p>	<p>No action required. No changes proposed.</p>
<p>Natural England</p>	<p>No specific comments.</p>	<p>No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
Other bodies and stakeholders		
Nexus	<p>Noted the recent introduction of 700/701bus service linking University sites at St Peter's, Chester Road, city centre and Pallion and request consideration of further funding to increase penetration of this service into residential areas towards the east and the coast.</p> <p>Consider proposed road system within north bank development is not conducive to public transport penetration – an east-west through road with parking restrictions would have been a better option in terms of sustainable transport.</p> <p>Consider long term aspiration for a ferry crossing likely to be too expensive; a more realistic option would be a planned and funded extension to service 700 (initially from developer contributions until sufficiently attractive to commercial operators). A low level bridge would have lower long term revenue and maintenance costs than a ferry, although initially greater capital outlay.</p> <p>Support provision of new subway access from St Peter's Metro; must connect to a direct, open and safe pedestrian route to become attractive and used.</p>	<p>The recent introduction of service 700 is noted. The consultation on the SPD is not considered to be the forum to request funding of bus services; this should be dealt with outside the SPD preparation process through dialogue between relevant parties. Comments noted. Plan on page 30 amended to include 700 bus service.</p> <p>It is not clear what is meant by 'an east-west through road' or how it could be achieved, particularly given the presence of St Peter's Church and grounds and the general topography of the area. Because of the surrounding road network, access and egress of the area will continue to be only possible from Dame Dorothy Street. Comment noted. No action required. No changes proposed.</p> <p>Opportunities to secure funding from development (s106 / Community Infrastructure Levy) to support public transport provision and improvements may arise in due course.</p> <p>It is considered that a ferry crossing could bring with it a number of other benefits, such as enlivening the river and riverside wharfs, tourism and enabling circular walks of the historic areas of both the north and south shores.</p> <p>The low level bridge is acknowledge to be a longer term aspiration, although the initial capital cost is likely to so greatly exceed that of establishing a ferry service as to make comparisons difficult.</p> <p>Comments noted. No action required. No changes proposed.</p> <p>Comment noted. No action required. No changes proposed.</p>
University of Sunderland	Pleased to note ongoing dialogue between the University and the City Council appears to have been successful in reaching a shared long term development strategy that	Comment noted. No action required. No changes proposed.

Respondent	Comments	Proposed action / changes to SPD document
	<p>responds to the requirements of English Heritage and addresses the needs of the University. Pleased to note that many of the points raised in its 1st September 2011 letter have been taken into account, at least in part.</p> <p>There are a number of points the University wishes to raise in respect of the current consultation draft. These points do not give rise to any fundamental concerns regarding the overall format and approach but the University asks that they be recorded and taken into account to ensure that the final document presented to Cabinet is as robust as possible.</p> <p>1 Design Code The University is pleased to note that this has been simplified and is more easily understood. The University welcomes the approach taken with regard to the scale and mass of the Learning Quarter, which comprises its campus.. The University is pleased to note the range of heights that are permissible and that there is an allowance of up to 5 storeys fronting the candidate World Heritage Site (p69)</p> <p>2 Student residential use The starting point for this SPG is the approved UDP policy NA3B.1, which identifies the University's campus as a Strategic Location for Change. It identifies a series of land uses and notes that student residential is an acceptable use. The policy assessment given at page 55 of the masterplan appears at odds with the development plan policy by stating that student accommodation is permissible with justification. It should be noted that the development plan policy, which will take precedence, identifies student accommodation as an acceptable use therefore no such justification is required. Given that this is a university campus on site student residents is the type of use that would be expected to be seen in this location. Therefore the University does not feel that the land use should be subject to any justification and should be identified as an acceptable use.</p> <p>3 Pedestrianising St Peter's Way The University notes the assumption that St Peter's Way</p>	<p>Comment noted. No action required. No changes proposed.</p> <p>1 Comment noted. No action required. No changes proposed.</p> <p>2 It is acknowledged that the over-arching planning policy for the area (UDP Alteration No.2 policy NA3B.1) includes student accommodation as an acceptable use. The justification required on page 55 of the SPD was intended to refer to the need to be able to justify the demand for additional student accommodation generally (that is, city-wide), rather than suggesting that the use would need to be justified on the University's land in particular. However it is agreed that the text of the SPD can be amended for clarity. Text on page 55 amended to remove the requirement that the provision of student accommodation at the St Peter's campus must be justified.</p> <p>3 The SPD proposes that St Peter's Way should become an</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>University of Sunderland cont.</p>	<p>becomes a pedestrian area, with high quality public realm treatment. Limiting traffic movement through this area will impact on the University and therefore there is a requirement for a clear specification of what vehicles can use St Peter's Way and when. Any restrictions need to be subject to a separate consultation.</p> <p>4 Views and vistas The University welcomes the removal of the reference to minimum widths of the view corridors. It notes the first bullet point on p63 which states that key views identified on p65 will have an influence on development within the character area. It appears that this is a less prescriptive approach, particularly when read with the third and fourth bullet points on p63. These state that development will only be permitted where it can be demonstrated that it reinforces and enhances the identified primary views and that developers will need to demonstrate that any loss of views is kept to a minimum and will have no detrimental impact. This puts the onus on the developer to present a case if the view corridor is to be impacted, rather than providing an assumption against development within the corridor. The University believes that this is an appropriate and flexible approach.</p> <p>5 Parking and servicing The SPD masterplan assumes that the zone east of the campus will become predominantly landscaped. This zone is an important parking and service area for the University and its loss will create major difficulties. The use of this areas for the purposes specified in the SPG needs to be reconsidered. The University would welcome a further detailed discussion on this matter. It is necessary to provide a commercially viable solution to the parking and servicing requirements of the University an these need to be incorporated within the SPG.</p> <p>6 Active use and frontage The design code places great emphasis on the creation of active frontages. This is overly prescriptive. The</p>	<p>area where pedestrians have priority, rather than being fully pedestrianised. This recognises that the area will be increasingly used by pedestrians in the future and that their needs and safety should take precedent over that of vehicles. However, vehicles will not be excluded from the area. The design and operation of the street will need to be subject to further dialogue with stakeholders at the appropriate time. Comment noted. No action required. No changes proposed.</p> <p>4 No action required. No changes proposed.</p> <p>5 It is acknowledged that future car parking requirements may be an issue in the area. However, the long term vision is that car parking and servicing provision associated with various development proposals in the area may free up existing parking and servicing areas for amenity uses for the benefit of the whole area and in particular to enhance the setting of the cWHS. Further dialogue will be required with stakeholders at the appropriate time. Comment noted. No action required. No changes proposed.</p> <p>6 It is important to note that the concept of 'active frontage' is not confined to the creation of retail or other commercial</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>University of Sunderland cont.</p>	<p>University needs to be able to design and use its buildings in a manner that best meets the academic and associated service functions of the University. The danger in requiring active frontages is that the market provides no demand and the active frontages remain vacant and boarded up for long periods of time or until their use is changed.. The University welcomes the SPG consideration of retail and leisure uses within the University campus but there must be flexibility to ensure that this is not an absolute requirement.</p> <p>NOTE: The University of Sunderland also submitted correspondence prior to the formal consultation process as part of the ongoing dialogue between them and the City Council. The following points, not repeated in the formal consultation on the draft SPD and dealt with above, were included in that correspondence and the University has asked that they be included in their formal response:</p> <p>Amount of design coding information – extensive, with the risk of being repetitious and contradictory. Would encourage making the design code more concise to ensure it can act as a robust and effective tool to guide future development.</p> <p>Need for parameters in key zones – appreciate flexibility of design coding approach but still concerned at possible ambiguity over acceptable development layouts in the key view shed zone. Believe it appropriate to define a parameter plan for this one area to remove future issues and safeguard a defined quantum of possible future development. A suitable parameter plan could be established during the consultation stage. Would welcome a more detailed assessment of the proposed use classes across the University’s land holding.</p> <p>Flexible space requirements – the list of flexible space requirements applicable to the Learning Quarter buildings (p61) will need to be reviewed at the next stage of</p>	<p>premises to create a sense of activity. However, buildings must be designed in such a way as to present an animated frontage to areas of public realm to create at least a sense of activity, overlooking and so on. Buildings should not present blank facades and elevations to public areas.</p> <p>It is acknowledged that, for clarity, the key to the plan on page 47 could be amended to remove reference to ‘commercial frontage’. Comment noted. Key to plan on page 47 amended accordingly.</p> <p>It is acknowledged that the document may appear repetitive when read in its totality. However, it is intended to be used as a toolkit by developers, architects, urban designers etc. (that is, a technical audience who will understand how it is intended to be used and interpreted). All the relevant information for each character area is contained in the section relating to that area, rather than having to constantly cross-reference other parts of the document. Comments noted. No action required. No changes proposed.</p> <p>The University’s response to the formal consultation further endorses the flexible approach to development but does not make further reference to the need for parameter plans for specific areas. It is considered that development in accordance with the SPD will deliver the quantum of development envisaged by the University without the need to specifically define particular elements of development. Comments noted. No action required. No changes proposed.</p> <p>The ‘list of flexible space requirements’ is actually a set of broad principles to be considered in the design of buildings to ensure they can be adapted over time to meet differing</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>University of Sunderland cont.</p>	<p>consultation.</p> <p>Feasibility of retaining wall remodelling – paragraph on page 63 advises that ‘topography of this area (around St Peter’s Church) needs to be remodelled to ensure views are maximised’ and should ‘include the removal of retaining walls and structures where feasible’. It should be emphasised that the removal of the existing retaining wall that supports the 6th-form centre’s car-park is not considered economically feasible.</p> <p>Design code architectural recommendations – we would seek to review some of the more prescriptive design coding principles at the consultation stage.</p>	<p>requirements of occupiers. This is considered to be a matter for further dialogue at the design stage of specific development proposals. Comments noted. No action required. No changes proposed.</p> <p>This is considered to be a view which is not currently supported by firm evidence. The feasibility, or otherwise, of removing the retaining wall, will depend on future development proposals and, among other things, the wider economic background against which they are brought forward. It is not appropriate to dismiss it as an option at this stage. Comments noted. No action required. No changes proposed.</p> <p>The approach to the architectural recommendations has been addressed following feedback from stakeholders in ongoing dialogue during the redrafting of the SPD. This issue has not been raised in the University’s formal consultation response. Comments noted. No action required. No changes proposed.</p>
<p>Akenside Developments</p>	<p>Masterplan is entirely compatible with medium and long term development aspirations. Support and commend the document.</p>	<p>Comment noted. No action required. No changes proposed.</p>
<p>Metnor Property Group</p>	<p>Concerned their development site (Bonnersfield) is within the cWHS buffer zone – could affect viability of development.</p> <p>Page 13 of the SPD includes reference to [UDP Alteration No.2] policy NA3B.1 and land use. The A1 retail referred to is very small. We would prefer to have wider scope for ground floor A3 uses including A1. The floorspace should be greater than 250sqm in total and individual units of 50sqm is too small.</p>	<p>The buffer zone of the cWHS was established and agreed at an early stage in the preparation of the WHS bid. It is the area within which it may be reasonably assumed there are archaeological remains associated with the monastery of St Peter’s and its surrounding estates. The SPD is not responsible for establishing the boundaries of the buffer zone, nor can it alter that boundary. Comment noted No action required. No changes proposed.</p> <p>The land uses and restrictions referred to are already established in the higher level planning policy also referred to. The SPD is not able to override the policies contained in the higher level document and SPDs in general can not, in any case, allocate land for particular uses. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Metnor Property Group cont.</p>	<p>Page 14 of the SPD should highlight (blue area, economic area) on our site not (green, open space) existing open space. We do not accept our land as L7 as stated on page 15 as the site is not insured for risks associated with outdoor recreation or leisure uses referred to on page 26.</p> <p>Page 29 of the SPD highlights key views of which P8 is of concern to ourselves. At best this is a limited view of the church which we hope does not harm the development potential of our site. We would prefer to have this removed from the document.</p> <p>Page 56 and 57 of the SPD responds to the scale and massing of the buildings. We believe viability of the site with its difficult topography etc will require IDP [Metnor's architects] to develop buildings between 6 and 11 storeys in height. The attached IDP sketch plan indicates our thoughts. We note your comments on heights related to the bridge deck however views of numerous roofs from the bridge need to be considered. We have responded by keeping below 12 storeys as stipulated on page 57.</p> <p>Pages 66, 67 and 68 of the SPD need to be updated to respond to the attached IDP sketch plan. Please note the landscape zone from the bridge to enable ease of access to the bridge for future maintenance, improve acoustics and improve natural light to the residential properties. We need flexibility with regard to courtyard areas and under-crofts as these have serious implications on viability particularly if they restrict residential accommodation on lower floors. Your note on pages 66 and 68 does not appear practical in this location.</p> <p>Page 69 and 70 of the SPD in respect of the Residential Quarter should refer to building heights of between 8 and 11 storeys fronting the river shore for viability reasons,</p>	<p>The land referred to is identified as existing open space in higher level policy contained in the adopted Unitary Development Plan (L7). The SPD can not override the higher level policy, nor allocate the land differently. However, the relevant policies in the UDP Alteration No.2, on which the SPD is largely based, do provide a greater level of flexibility for development proposals in the area. No action required. No changes proposed.</p> <p>View P8 was included in the final draft version of the SPD in error during the transfer of text and information into the document. As can be seen on the map on page 65 this view has not been taken forward to be considered as part of the design code. Comment noted No action required. No changes proposed.</p> <p>It is not appropriate for the SPD to incorporate specific layout and design proposals put forward by stakeholders – the SPD is intended to guide development, not vice versa. The indicative masterplan is the council's interpretation of how development could come forward. Other solutions are obviously possible and are not precluded – they would be considered at the appropriate time and assessed against the requirements of the SPD. The comments regarding the height of development relative to the Wearmouth Bridge deck are note; this issue will be addressed as detailed design proposals come forward. Comments noted No action required. No changes proposed.</p> <p>This issue will be addressed as detailed proposals are brought forward. Comment noted No action required. No changes proposed.</p> <p>It is not appropriate for the SPD to incorporate specific layout and design proposals put forward by stakeholders – the SPD is intended to guide development, not vice versa. This issue</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Metnor Property Group cont.</p>	<p>particularly due to the likely extent of foundation costs. The building heights on page 70 should be updated in line with the attached IDP sketch plan.</p> <p>Page 74 in respect of the gateway close to the Wearmouth Bridge to refer to building 6 to 10 storeys with the taller elements away from the bridge.</p> <p>Page 103 of the SPD refers to the Community Infrastructure Levy which, if implemented, is assumed to be a city-wide levy without unfair levy increases for the 'buffer zone' areas. The council needs to carefully consider the viability implications of both CIL and s106 obligations on developers. We are concerned the implications of the WHS will result in costly public realm obligations.</p> <p>We note the Strategic Environmental Assessment document dated August 2011 is included in our pack for the first time. Refer to page 48/50 of the SEA we would like reference to 5 and 8 storeys replaced with 6 and 11 storeys.</p>	<p>will be addressed as detailed proposals are brought forward. Comment noted No action required. No changes proposed.</p> <p>It is not appropriate for the SPD to incorporate specific layout and design proposals or requirements put forward by stakeholders – the SPD is intended to guide development, not vice versa. This issue will be addressed as detailed proposals are brought forward. Comment noted No action required. No changes proposed.</p> <p>This is not an issue to be addressed in this SPD. Development in the area will be subject to whatever requirements are set out in an agreed and adopted Community Infrastructure Levy; s106 obligations are subject to nationally established tests of reasonableness. Comment noted No action required. No changes proposed.</p> <p>It is not appropriate for the SPD to incorporate specific layout and design proposals or requirements put forward by stakeholders – the SPD is intended to guide development, not vice versa. This issue will be addressed as detailed proposals are brought forward. Comment noted No action required. No changes proposed.</p>
<p>Ministry of Defence</p>	<p>No safeguarding objections to the document.</p>	<p>No action required. No changes proposed.</p>
<p>Sunderland Heritage Quarter Project</p>	<p><u>Comment Specific to the Heritage Quarter Context</u></p> <p>The Heritage Quarter Project seeks to secure the regeneration of the East End in a way which is sensitive to the historic importance of the area and the remaining listed buildings and other historic fabric. In principle, promotion and implementation of proposals within the Masterplan could greatly assist in this regeneration. However, the success of these proposals will be dependent on the area south of the river becoming more attractive to developers (see below for further comment on this issue). Although there may be some 'spin-off'</p>	<p>Comment noted No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Sunderland Heritage Quarter Project</p>	<p>developer interest if the candidate WHS bid is successful, the impetus for development is likely to be primarily on the north bank.</p> <p>Specific Comments</p> <p><u>Inclusion of South Bank of the River:</u> The inclusion of the south bank within the boundary of the SPD is of great contextual importance to the candidate WHS as this is what visitors to St Peter's will see when looking to the south. Indeed, the river corridor is of great environmental and historical significance in its' own right. In turn, hopefully, inclusion of proposals here may help stimulate development on the south bank; indeed, development will be necessary to achieve the objectives of the Masterplan. Therefore we are pleased that the river frontage on the south bank is included within it.</p> <p><u>Strategic Sites and Market Appraisal:</u> We are pleased to note that sites at Scotia Quay, Numbers Garth and High Street East are included as 'strategic sites' (para 5.2) We are however concerned that, in the SWOT analysis (para 4.9) and the Market Appraisal (para 5.1) no reference is made to the lack of an effective market for development sites in the East End, even when the economy is generally buoyant, let alone now. This has been a problem in this area for well over 40 years (the Council's East End Plan of 1967 was meant to address this issue), and unless this developer resistance can be overcome, development here may continue to be aspirational rather than a realistic proposition. Whilst para 5.4 states the sites in the ownership of the North of England Civic Trust are subject to developer interest, this must be seen in context. These sites passed to the Trust when the Tyne Wear Development Corporation was wound up, and have been available for a good number of years; that no development materialized during the recent property boom tends to only confirm the lack of developer confidence in the locality. It would seem therefore that to stimulate development in the East End the Council will need to first invest in environmental works, improvements to pedestrian and vehicular access, including cross-river, and undertake intensive marketing of the area etc (possibly in conjunction with the Heritage Quarter Project's initiatives).</p>	<p>Comment noted No action required. No changes proposed.</p> <p>The City Council can not directly control levels of developer interest. Environmental improvements undertaken through public funding will be dependent on the availability of such funding at the appropriate time. Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Sunderland Heritage Quarter Project cont.</p>	<p><u>The Principle of Infill Development on High Street East and Low Street:</u> The proposed infill schemes here are supported provided they are sensitively undertaken reflecting their situation within a conservation area. They could restore the former intense urban grain of the locality and create a continuity of frontage development. If cross river links between the East End and St Peter's are enhanced there could be some developer spin off from the WHS in generating interest in building within the East End (eg waterfront hotels, restaurants).</p> <p><u>Numbers Garth:</u> There is no objection to the principle of development here, but the indicative design shown on p52 and p64 does not seem sensitive to either the prominence of the site from the cWHS and associated stretch of riverside (part of the site falls within a 'high level view' corridor), or its location within the Old Sunderland Riverside Conservation Area. It seems to have no distinctive merit at all and we would not endorse it as the ideal to which any development there should aspire. (NB On p77, in dealing with the Numbers Garth Gateway, the document states in bullet point 4 that the site is 'in proximity' to the Conservation Area. Surely it is <i>within</i> it, as shown on the plan on p10).</p> <p><u>Site at Junction of Bodlewell Lane & High St East:</u> This is very important visually, being prominent, and could 'round off' the wider block. Historically, it is also an important corner, leading to the ferry landing stage. Old photographs show that previously there were 18th and 19th century buildings here of some mass; if this is taken as a guide for new development a sizeable and impressive development could result. Care would need to be taken with the design both to create a building which both makes a statement at this historic corner and also respects the adjoining listed Quayside Exchange.</p> <p><u>Scotia Quay/Wylam Wharf Site:</u> This site provides opportunity to create a more impressive river frontage as well as to re-instate the dense urban grain that once characterized Low St. It is however also important to retain an attractive and continuous riverfront walkway</p>	<p>Comment noted. No action required. No changes proposed.</p> <p>The scale and quantum of development on this site is already influenced by the content of the adopted Sunderland Central Area Urban Design Strategy SPD. The form of development modelled in the SPD is only indicative, although development proposals should take full advantage of the dramatic location and views. Comment noted. No action required. No changes proposed.</p> <p>It is correctly noted that the site is within a Conservation Area. Text on page 77 amended accordingly.</p> <p>Detailed design and massing will be dealt with when development proposals / planning applications come forward. Comment noted. No action required. No changes proposed.</p> <p>Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Sunderland Heritage Quarter Project cont.</p>	<p>here, to maximize the environmental potential of the locality; it is noted the Masterplan makes provision for this.</p> <p><u>Site between The Boars Head and The Clarendon High St East:</u> Development of this site could help restore the urban grain in this now somewhat bleak part of High St East and remove a rather unattractive and under used viewing point. Retention of views from the Low Quay area (see next point) will more than compensate for this loss.</p> <p><u>Grassed Site at Low Quay/High Street East:</u> Notwithstanding our comment regarding the desirability of re-creating a continuous street frontage through development of infill sites on High St East, we consider it is also important to respect the role of the 'gap' site at Low Quay as a vantage point both to St Peter's and along the river corridor. In this regard, it is noted the document does not propose any development in this vicinity. Whilst appreciating the reasons for this, it is suggested that some <i>limited</i> frontage development to High St East on this land could also be desirable, retaining and upgrading the remaining open area to the north leading down to Low Quay, in the interests of creating a continuous frontage development. However we suggest that it is essential that a key viewpoint from High St East is identified and retained, possibly in the form of a small urban square with seating areas, in any development.</p> <p><u>Cross-River Access:</u> We wish to stress the importance of re-establishing strong cross-river connections, for historical reasons (the ferry, and the presence of grade 1 buildings and other 'heritage' features on the south side), ease of north/south movement, and to help secure the general regeneration of the East End conservation areas. Development on or overlooking the waterfront (where the sites are more prestigious, given the outlook) may stimulate wider developer interest within the East End's conservation areas and thereby lead to regeneration. From the perspective of the Heritage Quarter project and to emphasize the importance of development of cross river links there is a need to plan for any 'spin-off' if the WHS bid is successful, including a possible heritage trail from St Peter's embracing Holy Trinity Church, Queen St,</p>	<p>Comment noted. No action required. No changes proposed (see response to the next comment).</p> <p>There may be some merit in the points raised. On balance it is considered that site has become established and valued as providing a fine, wide viewing point over much of the river in its lower reaches. This in turn is considered to outweigh the likely development potential in restoring frontage to High Street East. However, development proposals could be considered on their merits if brought forward. Comment noted. No action required. No changes proposed.</p> <p>The SPD includes references to establishing cross river connections. The establishment of the suggested themed heritage trail is beyond the remit of the SPD, although delivery of the proposals within the SPD would clearly contribute to the viability and attractiveness of such a trail. It is also agreed that a ferry crossing would bring with it other benefits in addition to improved links (see response to Nexus comments, above). Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Sunderland Heritage Quarter Project cont.</p>	<p>The Quayside Exchange, Eagle Building and the Orphanage.</p> <p><u>Sites of Archaeological Importance:</u> Although the plan showing UDP Site Specific Allocations on p14 shows extensive areas of potential archaeological importance, there is little in the Masterplan which promotes the desirability of archaeological excavations where the opportunity arises. Whilst paragraph 4.8 indicates that an archaeological strategy is being developed by the Wearmouth-Jarrow Partnership, and this may meet this point, we nevertheless would have preferred to see some greater discussion of the need for archaeological works included in the current document, as it will have some standing as an SPD.</p> <p><u>Observations on the Overall Masterplan</u> Although outside of the direct sphere of interest of the Sunderland Heritage Quarter Project, the following comment relating to the form of development on the north bank in the vicinity of St Peter's Church itself may also be of relevance in the context of this consultation.</p> <p>The intention to keep building heights in the vicinity of St Peter's and adjacent to viewing axes low is appreciated. However, whilst the illustrative scheme on p62 of the vista from the south west shows low (2 storey) buildings in proximity to the intended vista of St Peter's, we consider the massing proposed immediately behind to dominate St Peter's Church, thus detracting from the design concept. These blocks include the 5 storey blocks proposed on the west side of the proposed vista from due south. We consider that development of this massing will totally dominate St Peter's Church, which is a diminutive building. It is noteworthy that there is no illustration showing the impact of buildings of this scale on the view of St Peter's from the south bank on this axis. The presence of the church needs emphasis not suppression. Perhaps more consideration needs to be given to the massing of buildings in this highly sensitive locality. It will be interesting to see how other consultees respond to this matter.</p>	<p>Chapter 10 of the SPD includes a section regarding the archaeological assessments likely to be required as part of development proposals in the buffer zone of the cWHS. The guidance provided is in accordance with information provided by the Tyne and Wear County Archaeologist. Comment noted. No action required. No changes proposed.</p> <p>Comment noted. No action required. No changes proposed.</p> <p>The limit on building heights around St Peter's Church was agreed in previous discussion with English Heritage and incorporated in the masterplan. Together with other requirements contained in the document this will ensure that building heights do not compromise or dominate the setting of the church. A cross section has been incorporated in the document at page 69 to demonstrate the likely relationship between St Peter's Church and potential surrounding buildings, and that those building heights are not excessive.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>Sunderland Heritage Quarter Project cont.</p>	<p><u>General Conclusion</u> Sunderland Heritage Quarter Project is generally supportive of the principle of preparing a Masterplan for the cWHS, and supports many of the proposals. However amendments along the lines suggested would enable us to give our wholehearted support. Additionally, and complementary to the SDP, we would like to see a statement of intent committing the Council to the effective marketing of the East End and associated environmental improvements to attract development into the area.</p>	<p>A stated intent to undertake specific marketing of the East End of Sunderland is beyond the remit of the SPD. Comment noted. No action required. No changes proposed.</p>
<p>General public</p>		
	<p>The main issues raised by members of the public are summarised as follows:</p> <ul style="list-style-type: none"> • Concerns that apartment living has yet to be embraced by Sunderland residents and that any such large scale development will be occupied by students (as currently happens in existing developments in the area). There is anecdotal evidence of conflict between students and other occupiers of apartment blocks. Apartment developments should be restricted to older occupiers (helping to release family homes into the market). Any apartments for students should be controlled by the University, to help control behaviour etc. • There are existing parking problems at Bonners Raff – new development should not exacerbate the situation. • Bonnersfield Road would require significant upgrading to access further development in the area. 	<p>The SPD can not restrict the occupation of residential development to particular social groups. Comment noted. No action required. No changes proposed.</p> <p>All development proposals must be accompanied by Traffic Assessments and Travel Plans which will be required to demonstrate the impact of development on the surrounding traffic network, car parking provision and so on. Comment noted. No action required. No changes proposed.</p> <p>Development proposals must be accompanied by Traffic Assessments and Travel Plans which will be required to demonstrate the impact of development on the surrounding traffic network, car parking provision and so on, including any requirements to upgrade any roads. Comment noted. No action required. No changes proposed.</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>General public cont.</p>	<ul style="list-style-type: none"> • Lack of public transport links. • Lack of children’s playspace. • Need facilities to cater for cyclists and pedestrians (especially C2C visitors). • Additional housing will devalue existing housing market (including rental). • Need adequate parking to attract residents. • North facing properties will receive no sunlight and those not on riverfront will be overshadowed. • Plan misleading, showing St Peter’s in green field – in reality surrounded by housing for which there is no need. 	<p>Development proposals must be accompanied by Traffic Assessments and Travel Plans which will be required to demonstrate the impact of development on public transport infrastructure and any need for additional provision. Comment noted. No action required. No changes proposed.</p> <p>Developer contributions towards the provision of children’s playspace (either on or off site) will be established and sought at the appropriate time as residential development proposals come forward. Comment noted. No action required. No changes proposed.</p> <p>It is considered that there is scope within the SPD for such facilities to be provided if necessary (in addition to facilities such as the café/restaurant at the National Glass Centre). However, it should be noted that the area is less than 1mile from the official end of the C2C cycle route where such activity-related facilities might normally be expected to be found. Comment noted. No action required. No changes proposed.</p> <p>Property values are not a planning consideration. Comment noted. No action required. No changes proposed.</p> <p>All development proposals must be accompanied by Traffic Assessments and Travel Plans which will be required to demonstrate the need for car parking provision and so on. Comment noted. No action required. No changes proposed.</p> <p>This is a matter of design detail to be dealt with as development proposals come forward, including the need for daylight assessments and the need to ensure that buildings are not unduly overshadowed. However, there is nothing in principle to preclude north facing windows.</p> <p>It is unclear what is meant by this comment. St Peter’s Church does sit at the centre of a green space, and will continue to do so. New development in the immediate vicinity of the church grounds will not be residential. Comment</p>

Respondent	Comments	Proposed action / changes to SPD document
<p>General public cont.</p>	<ul style="list-style-type: none"> • Access is difficult in winter conditions. • Take away public funding; let the private sector pay. 	<p>noted. No action required. No changes proposed.</p> <p>Comment noted. No action required. No changes proposed.</p> <p>It is anticipated that most of the development in the SPD area will be funded by the private sector, or the University of Sunderland. Comment noted. No action required. No changes proposed.</p>