

Appendix 2 : Stakeholder responses to Holmeside Development Framework  
(23.03.2009 - 19.06.2009)

Stakeholder	Summary of response	Council's response
<b>External Stakeholders</b>		
County Archaeologist	<p>The site is outside the medieval historic core and thus does not require archaeological work.</p> <p>However I would recommend that any historic buildings which are proposed for demolition (e.g. old cinemas, shops etc) are photographed before demolition to provide an archive record</p>	<p><b>Comment Noted – No Change</b></p> <p><b>Comment noted – Amend</b> <i><b>Insert new para. (2.5)</b></i> <i>The old cinema (now Mecca Bingo) and row of shops on Holmeside are of sufficient value to warrant photographic archiving prior to demolition. The developer is recommended to commission a photographic contractor to provide photographic documentation of these buildings in accordance with a brief provided by the County Archaeologist. The City Council's Conservation Team should be contacted for further information in this regard.</i></p>
Nexus	<p>Thank you for consulting Nexus on the above document. We are pleased to note that it addresses most of the issues that we raised in our original response last September. I would however like to reiterate the need for developers to ensure that there is no impact on safe operation of the Metro/Rail lines during construction.</p> <p>I note that consultation with rail operators is mentioned in regard to the possible new footbridge connection to the site. In relation to point 5.4 we welcome the intention that servicing will be done from within the site but feel that this should be worded more strongly to avoid any servicing to frontages on Holmeside which could disrupt bus movements.</p>	<p><b>Comment noted – No Change</b> Matters relating to the impacts of construction of the Holmeside development on surrounding operations will be dealt with at the planning application stage by means of planning conditions.</p> <p><b>Comment noted – No Change</b> It is considered that the requirements of the Development Framework in relation to servicing are sufficient at this stage. Further work into the impact of the development on transport routes and the necessary mitigation measures will be carried out prior to the submission of any planning application. The developer will be required to complete a transport assessment to determine the optimum access arrangements</p>
Reynolds Outdoor Centre	<p>Although not directly related to the overall plan included in the Development Framework how will the areas adjacent to the Holmeside Triangle be incorporated within the redevelopment?</p> <p>The plan indicates that the surrounding areas should be considered but the Appendix showing the pedestrian routes identifies pedestrian flow from Park Lane through the new development or directly to the Bridges along the</p>	<p><b>Comment noted – No Change</b> The purpose of the Development Framework is to provide planning and design principles for the Holmeside Triangle site only. It is not intended to provide a regeneration strategy for the wider area.</p> <p>Notwithstanding this, the development Framework does encourage new development that integrates with surrounding areas and it is envisaged that new development at Holmeside will enhance the retail area and have a regenerative effect on surrounding streets.</p>

	<p>existing pedestrian area and not including areas such as Derwent Street and Olive Street.</p> <p>How are areas such as the 'park lane shopping village' to be redeveloped and incorporated both into the new development and the 'night life quarter' so that the area can be attractive to retail business?</p> <p>The area currently has seen both retail and night life business close and currently does not have an attractive environment to attract investment in, particularly, new retail business. The result is that the area, which currently incorporates a selection of specialist, family and local business, are continuing to suffer to the detriment of large retail chains in the Bridges. The current economic climate makes this even worse and the area is nothing more than 'shutter city' for the majority of the day with little footfall .</p> <p>Could you please confirm what is the short/medium and long term plan for the redevelopment of the entire Park Lane area and any anticipated time scales such that the areas are not further neglected and that they strive to be of the quality as identified in the UDP.</p>	
<p>Association of North East Councils</p>	<p>Having looked through the documentation the reuse of a previously developed site in the city centre for mixed uses which complement the city centre reflect RSS objectives. We are always pressing major applications to ensure that they provide BREEAM/Code for Sustainable homes energy efficiency standards and to provide at least 10% of their energy requirements from decentralised renewable/low carbon energy sources. It is noted that these aspects are covered by paragraphs 5.8 and 5.9. It may be beneficial to include this requirement in the planning application part and in particular the use of the micro-renewables toolkit to provide justification for why the inclusion of these measures is not considered viable or feasible.</p>	<p><b>Comment noted – Amend</b></p> <p><b><i>Insert RSS Policies 3, 24 and 38 into Appendix 3 of Development Framework</i></b></p> <p>The Development Framework includes requirements for 10% renewables and at least Code for Sustainable Homes level 3 on residential development and BREEAM Very Good or Excellent on other development. Whilst the document itself does not set out how the targets can be achieved the developer is required to produce a Sustainability Statement as part of the Validation requirements for the site This statement must demonstrate how the principles set out in policy and the Framework have been achieved. It has been agreed that this will be submitted as part of the Design and Access Statement</p>

Sunderland Taxis	<p>In this document the site Location Plan shows the access from Holmeside to the original Stockton Road closed off. It also shows the east of Derwent Street and Olive Street closed off where they junction Park Lane. You can appreciate that as a taxi company requiring access to our premises at the rear of Olive Street these closures would severely impede our ability to trade probably forcing closure.</p> <p>At the time you assured me that the site Location Plan was misleading and that there is no intention of implementing these closures. Could you please confirm this in writing in order that I can reassure my staff as to the security of their jobs and continue to develop the company with confidence?</p>	<p><b>Comment noted – No Change</b></p> <p>Letter has been sent to Sunderland Taxis (29.04.2009) confirming that development at the Holmeside site would not compromise access to their premises. Perceived closure was due to misinterpretation by Sunderland taxis of the OS map, which indicates a change in road surface at the junctions of Park Lane and Derwent and Olive Streets.</p>
Tates Travel	<p>I am unable to determine if any of the adjustments made to the plan alter the impact on our property over the original plan, but it would seem not to be the case. On that basis, therefore, my original objections which were lodged during the first round of consultation still stand.</p> <p><b>Original objection:</b> We have an established business operating from premises encompassed within the proposed development. This development will require relocation of the business which will be costly and may damage future revenues both for Coursetest Limited as freeholder and the existing tenant.</p>	<p><b>Comment Noted – No Change</b></p> <p>The role of the Holmeside Triangle Development Framework is to set out key development principles for the site, to be reflected in a detailed masterplan prepared by the developer. It will be necessary for this masterplan to demonstrate that the scheme proposals would achieve the proper planning of the area and / or the promotion or improvement of the economic, social and environmental well-being of the area. Ultimately it is for the developer to establish the uses to go on site, prepare a site assembly strategy and to negotiate with the various existing freeholders. This is identified in the development Framework in paragraph 1.7.</p>
Sport England	<p>We are pleased that the document has made reference to Active Design under paragraph 4.4 and that our comments made on the previous draft have been included in this version of the draft.</p>	<p><b>Comment Noted – No Change</b></p>
English Heritage	<p>Paragraphs 2.3 and 2.4 There should be a commitment in this section to the safeguarding of heritage assets and, where appropriate, their incorporation into the scheme. It is not sufficient to simply assess the impact of the scheme on the setting of those assets. It would be helpful to show these heritage assets on a plan.</p>	<p><b>Comment Noted – Amend</b> <b>Amend paragraph 2.4 to read:</b> <i>Given the proximity of the Holmeside site to a number of the city's centrally located Conservation Areas, Listed buildings and a Historic Park and Garden, it is imperative that development proposals do not compromise these heritage assets. As part of the masterplanning process and Design and Access Statement for the site, the developer must demonstrate that these heritage assets will be satisfactorily safeguarded with minimal impact upon their setting and character.</i></p>

	<p>Paragraph 4.4 You might usefully include, in the list of documents to be considered, <i>Creating Successful Masterplans: A Guide for Clients</i>, published by CABE.</p> <p>Paragraph 5.3(5) I note that the service access is to be provided at the north eastern corner of the site. This is where the listed buildings are. Especial care will need to be taken not to harm the setting of these buildings.</p> <p>Paragraph 5.4 Reference is made to 'local heritage' in addition to designated asset. What does this comprise, and where is it? Again, a plan would be useful.</p> <p>Paragraphs 5.5 and 5.6 English Heritage welcomes the requirement to enhance the quality of the built environment of the locality and to re-establish its urban form and character. It is important that this is achieved in such a way that reinforces local distinctiveness. The fourth bullet point appears to acknowledge this. The third bullet point refers to 'landmark building(s)', but only one is shown on the plan in Appendix 4. This landmark building, it seems, would be located close to the nearby listed buildings, where setting could be harmed by any sizeable or overtopping structure.</p> <p>Delete the words 'where feasible' in the sixth bullet point.</p>	<p><b>Amend proposals plan:</b> Highlight Sunnyside, Ashbrooke and Bishopwearmouth Conservation Areas. Listed buildings and the park are already indicated as heritage assets on the plan.</p> <p><b>Comment Noted – Amend</b> <b>Insert bullet point paragraph 4.4:</b></p> <ul style="list-style-type: none"> <li>• <i>Creating Successful Masterplans: A Guide for clients, (CABE)</i></li> </ul> <p><b>Comment noted – No Change</b> See response above and amendment to paragraph 2.4</p> <p><b>Comment noted – Amend</b> <b>Amend final sentence paragraph 5.4 to read:</b> <i>Again any such access proposals should be accompanied by evidence that this would not have unacceptable impacts upon the road network or heritage assets, including the Sunnyside, Ashbrooke and Bishopwearmouth Conservation Areas, Mowbray Park and the listed buildings adjacent to Burdon Road (see Framework Diagram Appendix 4).</i></p> <p><b>Comment noted - Amend</b> The Framework Diagram in Appendix 4 is intended to be indicative. The location and quantity of landmark buildings will be determined by the developer as part of the Masterplanning process. The Design and Access statement will form part of this process and must demonstrate to the City Council that any landmark buildings (regardless of their location within the site) would not harm the setting of the nearby listed buildings.</p> <p><b>Amend heading on Framework principles plan Appendix 4 to read:</b> <i>'Indicative Development Framework Diagram'</i></p> <p><b>Amend key to include 'potential' or 'indicative' elements (e.g. pedestrian route/potential public space)</b></p> <p><b>Comment noted – No change</b> The purpose of the development framework is to provide broad principles for development</p>
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<p>Sunderland arc</p>	<p>Sunderland arc welcomes the progress made following the previous consultation and wholly supports the overall approach contained within the Development Framework. Regeneration of the Holmeside Triangle is a priority within the arc's Business Plan and is a key component of the strategy to bring about transformational change in Sunderland City Centre.</p> <p>In relation to land assembly, we agree that it is appropriate for the masterplan, rather than the Development Framework, to provide the justification for any specific removal of buildings and acquisition of land. We therefore endorse the clarification contained in the new paragraph 1.7.</p> <p>In relation to the sub-section on Movement, we welcome the emphasis placed in the new paragraph 5.4 on the need to ensure that vehicle access arrangements for the Holmeside Triangle can be achieved without causing unacceptable impacts on the local heritage, including the setting of the Conservation Areas, Mowbray Gardens and the listed buildings on Burdon Road.</p> <p>Regarding the sub-section on Comprehensive Development (paragraphs 5.10-5.12), we agree with the majority of the proposed revisions. However, whilst we are content with</p>	<p><b>Comment Noted – No Change</b></p> <p><b>Comment Noted – No Change</b></p> <p><b>Comment Noted - No Change</b></p> <p><b>Comment noted – Amend</b> <b>Amend paragraph 5.10 to read:</b> <i>'It is an aspiration of this Development Framework to achieve uninterrupted sightlines at street level by way of direct pedestrian</i></p>

	<p>the new introductory working to 5.11, we think it important to retain the association between 'sight lines' and 'pedestrian routes' (incorporated in the 2008 Consultation Draft), including the key link with the Bridges Shopping Centre at the corner of Holmeside and Park Lane. We therefore feel that it would be appropriate to reinstate the words "by way of direct pedestrian routes" after "street level" – in line with the 2008 draft and also to maintain consistency with paragraphs 5.3.2. Arguably this consistency should also be carried through into paragraph 5.6 (2<sup>nd</sup> bullet). In relation to the last part of paragraph 5.11, we agree that the masterplan for the scheme will need to fully set out and assess the detailed options for achieving the required sight lines/pedestrian routes; however the broad principles relating to the sight lines and pedestrian routes are clearly to be established in the Development Framework itself (5.3.2, 5.6 etc).</p> <p>Also, the inclusion of this paragraph under the 'Comprehensive Development' sub-section of section 5 (Development Principles), needs to be appropriately reflected in the text. Therefore we suggest that the last sentence should be reworded to read "Any masterplan(s) should fully assess the detailed options relating to such sight lines and pedestrian routes, with a view to achieving the highest possible quality of built environment and a comprehensive approach to the regeneration of the site."</p>	<p><i>routes from the centre of the development area to the Holmeside / Park Lane corner, the corner of Holmeside and Waterloo Place and the Park Lane Interchange, as shown on the indicative Framework Plan (see Appendix 4)....'</i></p> <p><b>Comment Noted – Amend</b> Policy EC5A Sets the requirement for a comprehensive redevelopment site. As such repetition of this will not be necessary. <b>However the last sentence of paragraph 5.10 shall be amended to read:</b> <i>'Any masterplan should fully assess the detailed options relating to such sight lines and pedestrian routes, with a view to achieving the highest possible quality of built environment'</i></p>
<p>Murdoch Associates (on behalf of Mecca Bingo)</p>	<p>While my clients appreciate that it may not be possible for a document such as this framework to absolutely insist upon retention of a particular existing use even where like their bingo club it is appropriately located and so evidently contributes to the leisure function of an area, my clients nonetheless believe that it should where ever possible be an aspiration that the framework should stress. There are a number of paragraphs where reference could be made to it. For example,</p> <ul style="list-style-type: none"> <li>- The key principles set out in 1.5 could be expanded to include where appropriate the retention/relocation of existing uses;</li> <li>- In recognising that existing</li> </ul>	<p><b>Comment noted - amend</b> It is acknowledged that the Bingo club is a compatible use for the site – it represents an evening use that would be unlikely to impact upon the amenity of any residential buildings on the site. However it is not considered necessary to state this explicitly in the Framework. There are a number of compatible uses and these are established through planning policy.</p> <p>The role of the Holmeside Triangle Development Framework is to set out key development principles for the site, to be reflected in a detailed masterplan prepared by the developer. Ultimately it is for the developer to establish the uses to go on site, prepare a site assembly strategy and to negotiate with the various existing freeholders. Nevertheless <b>paragraph 1.7 shall be</b></p>

	<p>buildings may need to be removed, 1.7 could require the appropriate relocation of the existing uses as part of that process; and</p> <ul style="list-style-type: none"> <li>- A full recognition of the importance of the existing uses, including the bingo club, should be made in 2.2 and 5.2.</li> </ul> <p>While not objecting to the principle of the Triangle redevelopment my clients must protect their successful business which provides both a facility and jobs for local residents. They are the freehold owners of their building and will resist any proposals which result in its removal unless there are appropriate steps taken to ensure that they are provided with suitably located alternative premises in a manner which enables them to remain operational throughout the development period.</p>	<p><b>amended to read:</b>  <i>'...it will be necessary for the masterplan to demonstrate that the scheme proposals would achieve the proper planning of the area and/or the promotion or improvement of the economic, social and environmental well-being of the area. <b>The relocation of existing business uses within the site will be acceptable where these uses are compatible with the principles of the Framework and planning policy. In accordance with Policy EC5A compulsory purchase will be considered where the masterplan proposals demonstrate that such acquisition is necessary.'</b></i></p>
<p>DPP (Bedford Office)</p>	<p>Paragraph 1.18 of the first draft indicated that it would be a key feature of the development of the site to provide a direct pedestrian route between the centre of the site and the Holmeside/Park Lane corner. Although the current consultation version seeks to provide convenient and attractive pedestrian routes between the centre of the Holmeside Triangle and a number of locations around the site, and examples are illustrated in the (previously unseen) Framework Diagram at Appendix 4, it is no longer a <b>requirement</b> for the route to the Holmeside/Park Lane corner to be direct (paragraph 5.3). This is consistent with the UDP Inquiry Inspector's conclusions and is recognised at paragraph 5.11 by the description of uninterrupted sight lines as an "aspiration" of the Development Framework rather than a requirement (see paragraph 1.24 of the earlier version).</p> <p>We welcome these changes, which indicate that our client's premises will not be required as part of the development of the Holmeside Triangle, but believe that clarity would be better served if the diagram were to be amended (a) to demonstrate alternative ways in which a route can be provided without necessitating the acquisition of the Point, and (b) to</p>	<p><b>Comments noted – No Change</b></p> <p><b>Comment Noted - Amend</b>  <b>Amend heading on Framework principles plan Appendix 4 to read:</b>  <i>'Indicative Development Framework Diagram'</i></p> <p><b>Amend key to include 'potential' or 'indicative' elements (e.g. pedestrian route/potential public space)</b>  It is not considered that alternative versions of the plan will need to be shown to demonstrate</p>

	<p>indicate clearly that it is illustrative. Clearly, where there is conflict between the text of the policy and the diagram, the former should prevail, as we would expect the Council to recognise in the Brief.</p> <p>Paragraphs 4.1 and 5.1 of the Development Framework and the UDP policies in Appendix 2 set out the range of required and acceptable land uses by reference to a version of the Use Classes Order which has since been superseded. In particular nightclubs have been taken out of Use Class D2. We suggest the Development Framework should be amended to reflect this change and to clarify that nightclubs will also be a required use. This would be consistent with the inclusion of the Holmeside Triangle in the defined Night Life Quarter.</p>	<p>the different ways in which routes can be provided without necessitating acquisition of The Point. The term 'indicative' will clearly denote a suggestive approach to development. The document is not intended to be prescriptive, rather set the principles for development. Further explanation and clarification is not necessary</p> <p><b>Comment noted – No change</b> It would be inappropriate for the Development Framework to explicitly state that nightclubs should be a required use on the site. It is not the purpose of the Framework to prescribe uses in addition to those established in policy SA55.1 of Alteration No.2. In accordance with the above policy, the Development Framework states that uses not referred to in policy will be considered on their own merits.</p>
<p>DPP (Newcastle-Upon-Tyne Office)</p>	<p>In relation to the Council's aspirations for the comprehensive redevelopment of the Holmeside Triangle, we welcome the acknowledgement that site assembly and land acquisition is an issue, although we note that the document does not attempt to provide a strategy for this. We remain of the view that land ownership issues represent a barrier to the truly comprehensive development of this site.</p> <p>We note the change in emphasis in that the document now identifies an 'anchor retail unit in the form of a food and non-food supermarket/superstore'</p>	<p><b>Comment noted – No change</b> It is considered that the Development Framework would be an unsuitable vehicle for a land acquisition and site assembly strategy. Policy EC5A in UDP Alteration No.2 states that The purpose of the 'broad framework document' is to set out key principles to be reflected in a comprehensive masterplan for the site. This point is highlighted in paragraph 1.7 of the Development Framework: <i>'This Framework does not attempt to provide a strategy for the assembly of any land / buildings within the Holmeside Triangle site. The assembly and acquisition of land, as necessary, are matters for the developer(s). Where existing buildings are required to be removed from the site in order to achieve the principles set out in this Framework, and within relevant Development Plan policies, it will be necessary for the masterplan to demonstrate that the scheme proposals would achieve the proper planning of the area and / or the promotion or improvement of the economic, social and environmental well-being of the area. In accordance with Policy EC5A, compulsory purchase will be considered, where the masterplan proposals demonstrate that such acquisition is necessary.'</i></p> <p><b>Comment Noted – No Change</b> The Development Framework acknowledges rather than specifies the opportunity for a retail unit in the form of a food and non-food</p>



	<p>as a potential use rather than a requirement. We remain of the view that this site has severe limitations in terms of its suitability for a major foodstore and re-iterate that Tesco Stores Ltd have considered the option of such a facility on this site but dismissed this on a number of grounds, not least accessibility for car-borne shoppers.</p> <p>Under the general heading "Movement", points 5) and 6) set out the proposed vehicular access into the site. We acknowledge that further text has been provided requiring developers to demonstrate that the proposed access will not have unacceptable impacts on the road network of the Conservation Areas (paragraph 5.4). However the draft framework still maintains the position that service/delivery vehicles will predominantly access the Holmeside Triangle area via Holmeside despite the reservations expressed by the UDP Inspector. Whilst the document notes that Burdon Road will be considered as an access the emphasis remains on this being an option rather than a requirement as identified by the UDP Inspector. We remain of the view that the onus should be on the Council to demonstrate that access from Burdon Road is deliverable.</p>	<p>supermarket/superstore.</p> <p><b>Comment Noted – No change</b>  It is acknowledged that the Inspector expressed reservations about Holmeside's role as the main point for service access due to the need for service vehicles to cross the major pedestrian flow across Holmeside between Park Lane and the Bridges Shopping Centre. His report concludes that conflicts at this point must be 'avoided wherever possible'.</p> <p>Currently access along Vine Place and Holmeside is restricted to buses, taxis, disabled badge holders, loading vehicles and permit holders. However access from the west is restricted further by a 'Bus Only Lane' along Vine Place. Therefore the above mentioned vehicles (excluding buses) would only encounter the major pedestrian flows when travelling along Holmeside from the east. It is considered that this measure would reduce the impact of delivery vehicles on pedestrian flows.</p> <p>The indicative proposed service access to the site is located to the eastern end of the Holmeside site, opposite Waterloo Place. Vehicles servicing the site would - as a result of the traffic restrictions at Vine Place - need to approach the site from the east. It is therefore considered that service vehicles approaching the site would therefore feasibly not need to progress further along Holmeside than the proposed access point. The major pedestrian flow across Holmeside between Park Lane and the Bridges referred to by the Inspector is located to the western end of Holmeside at the junction with Park Lane.</p> <p>In terms of service vehicles departing from the site, it is considered that there is scope to mitigate against any potential conflict through traffic management measures. It will be the role of the transport assessment and travel plan to determine the best solution in this regard.</p> <p>In his report the UDP Inspector refers to the suggested access arrangements for the site.</p>
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	<p>Both the UDP Inspector and the Council have confirmed that the development of Holmeside need not involve the demolition of this unit (<i>the Point</i>) and we understand this was acknowledged within the Joint Statement agreed by the City Council and Braemar at the UDP Inquiry. In our view the development brief should identify alternative development options in the likely event that the night club building remains.</p>	<p>Currently there are two proposed points of access to the site – from Holmeside, and from Park Lane via Cowan Terrace. A third point of access from Burdon Road has also been suggested as an option. In the report the Inspector concludes that despite reservations about Holmeside’s role as the main point for service access and the potential impact on the Conservation Area of utilising the Cowan Terrace approach for car traffic:</p> <p><i>.. ‘The third option for access is sufficient in my view (for me) to conclude that it <b>would be possible</b> for acceptable arrangements for access to be devised’.</i></p> <p>Therefore the Inspector is satisfied that the presence of this third access point as an option will result in suitable access arrangements for the site being found. In his report, the UDP Inspector <b>does not require</b> this point of access to be incorporated into the development.</p> <p>Accordingly the Development Framework reflects his conclusion by allowing for the consideration of this third option should it be necessary. The Council remains of the view that it is for the Developer through the Masterplanning process and the associated Transport assessment to determine the optimum access arrangements.</p> <p><b>Comment Noted - No Change</b> The purpose of the Development Framework is to provide broad principles to guide developers in preparing a masterplan for the site. An indicative plan is provided to demonstrate how these principles may be translated into a site layout. However it is for the masterplan to determine and justify the best development solution for the site (including the inclusion or otherwise of The Point). It is not considered appropriate for the Framework to identify various alternative development options for the site.</p>
<p>Montagu Evans</p>	<p>The Development Framework in its current form should recognise that The Point may not be available to be part of the comprehensive redevelopment of the site and indeed the City Council’s agreed joint Statement submitted to the UDP Inquiry which stated that the development of the Holmeside site could be achieved without the inclusion of the Point should be referred to. We would</p>	<p><b>Comment noted - No change</b> The purpose of the Development Framework is to provide the broad principles to guide developers in preparing a masterplan for the site. It is for the masterplan to determine whether or not the retention of the Point would secure the highest possible quality of built environment and achieve the proper planning of the area.</p> <p>In addition, as set out above in response to</p>

	<p>therefore recommend that the wording of the above text is altered to reinforce these objectives without the requirement for The Point to be included.</p> <p>The list provided at section 6 should also include reference to a retail assessment and also Section 106 Contributions/Heads of Terms.</p> <p>Draft PPS4, published in May 2009 provides additional guidance for the local planning authorities and the preparation of development framework documents. It is important that the relevant sections from this document are reflected in the framework report. In particular this document should be referenced in para. 4.3 of the Planning Policy and Best practice section.</p>	<p>comments made by DPP (Bedford Office) the Framework document is not intended to be prescriptive, it sets the broad principles for development. Therefore it is not considered that alternative versions of the plan will need to be shown to demonstrate the different ways in which routes can be provided without necessitating acquisition of The Point.</p> <p><b>Comment noted</b>  <b>Amend paragraph 6 to include:</b>  <i>Statement containing draft Heads of Terms for planning agreement where appropriate</i></p> <p>It is not considered necessary to include reference to a retail assessment.</p> <p>Paragraph 3.8 of the Current PPS6 states that: 'It is not necessary to demonstrate the need for retail proposals within the primary shopping area or for other main town centre uses located within the town centre.'</p> <p>In addition, paragraph 3.20 states: 'Impact assessments should be undertaken for any application for a main town centre use which would be in an edge-of-centre or out-of-centre location and which is not in accordance with an up-to-date development plan strategy. Where a significant development in a centre, not in accordance with the development plan strategy, would substantially increase the attraction of the centre and could have an impact on other centres, the impact on other centres will also need to be assessed.' The Holmeside development <b>is</b> in accordance with the Development Plan Strategy, is located in the 'town centre' and as such a retail impact assessment would not be necessary.</p> <p>PPS6: Planning for Town centres remains the national planning guidance for retail development and carries the most weight. As such the Framework responds to the requirements of this document regarding this issue.</p> <p><b>Comment noted</b>  <b>Amend paragraph 4.3 to include:</b></p> <ul style="list-style-type: none"> <li>• <i>Draft PPS4: Planning for Sustainable Economic Development</i></li> </ul>
Thornfield	In summary, the various grounds of objection/comments are:	<b>Comment Noted – Amend</b> Details of alterations or otherwise can be found

	<ul style="list-style-type: none"> <li>• The conditions of the local housing market and consumer demand mean that the achievement of all land uses required by UDP Policy SA55A.1 may not be feasible or realistic, especially in relation to the residential element. We do however accept that in the Comprehensive Development Sites as defined by the Unitary Development Plan the Council intends to promote a vibrant mixed-use environment focused on improved public realm. On the Holmeside site, we believe this is achievable through a retail-led scheme which is centred on an attractive public realm and convenient pedestrian routes. Rather than merely repeating the requirements of the Policy, the role of the Framework in this respect should be to provide the right background for the assessment of planning proposals in a way that reflects the economic conditions of the time and enables to deliver regeneration benefits through a retail-led scheme.</li> <li>• UDP Policy EC5A on Comprehensive Development Sites states that for each site the Council will prepare a 'broad' framework document setting out the key principles to be reflected in each comprehensive Masterplan. However, the Framework is unnecessarily and overly prescriptive on some design aspects, hence not reflecting the real intention of the UDP Policy. Comments on specific areas are given below in the detailed section of this letter. In these areas, the Framework should be amended to extrapolate the broad design principles and the objectives that any development should conform to in order to deliver a high-quality, attractive and vibrant town centre environment.</li> <li>• Similarly, the Framework's Illustrative Diagram (attached in Appendix 4) is unnecessarily prescriptive. Such a specific and fixed illustration may in fact undermine and unduly constrain the consideration of the future Masterplan for the site. We also question the overall purpose and</li> </ul>	<p>in the detailed commentary section below</p>
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	<p>status of the Diagram, as any forthcoming Masterplan should be assessed with an open mind in terms of how proposals fulfil the design principles contained in the Framework and not on the basis of compliance with this Diagram on aspects such as urban design and layout. In other words, Masterplans that depart from this Diagram should still be considered positively as long as they fulfil the urban design objectives and principles contained in the Framework.</p> <ul style="list-style-type: none"> <li>• In line with the allocation map of UDP Policy SA55A.1, the Framework’s area boundary extends to include some triangular land bounded by the railway line, the Civic Centre Car Park and Burdon Road, with current vehicular access from Burdon Road. The Diagram earmarks this land for “Landscape Improvements”. The Framework provides no information on the ownership or current use of this area, but it would appear from aerial and satellite photographs that this land is used for access and storage associated with the railway use to the west and north, Given the constraints associated with the existing use and the obvious segregation of this site from the Holmeside Triangle site as a result of the barrier created by the railway line and topographical levels, the Framework can only be aspirational in relation to the development and improvement of this site and should acknowledge the context and limitations underpinning the delivery of the suggested landscape improvements. Ultimately it should be the role of the Masterplan to identify development/enhancement opportunities within the boundary of the UDP allocation and whether it is desirable to link this land to the main Holmeside Triangle site.</li> </ul> <p>The following section expands on the above summary points in reference to specific sections of the Framework.</p> <p><b>Representations (detailed commentary)</b></p> <p>2.0 SITE AND SURROUNDINGS</p>	<p><b>Comment noted – Amend</b></p>
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	<p><b><u>General</u></b> This section should contain some description of the triangular piece of land along Burdon Road bounded by the railway lines, the Civic Centre Car Park and Burdon Road, earmarked for “Landscape Improvements”, including details of existing ownership and use.</p> <p><b><u>Para 2.3</u></b> <b>Suggestion:</b> move this Paragraph after Para 2.1.</p> <p><b>Suggestion:</b> add reference to the Railway Station in close proximity to the north.</p> <p><b>Typo:</b> “A collection of Grade II Listed Buildings occupies”.</p> <p>5.0 DEVELOPMENT PRINCIPLES <b><u>Land Use Proposals</u></b> <b><u>Para 5.1</u></b> Comment: We believe that it would be appropriate for this Framework to provide a context for the flexible application of the UDP Policy provisions in relation to the required uses, by acknowledging that a viable and deliverable scheme is of course a reflection of the economic circumstances of the time and that it may not be possible or viable to deliver all the uses specifically ‘required’ by the Policy.</p> <p>The main principle that the Framework should acknowledge is that, in accordance with the Development Plan policies and the aspirations of the Council, any development should deliver an attractive and vibrant mixed-use environment supported by a high quality public realm. The Holmeside Triangle site can deliver this through a retail-led but mixed scheme that will provide physical and economic regeneration benefits.</p> <p>The descriptive text of Policy SA55A.1 recognises the role that this site plays in the qualitative and quantitative improvement of Sunderland’s retail core and it is important that any proposal is viable and with a realistic prospect of implementation, so that the</p>	<p><b><i>Insert paragraph 2.3 to read:</i></b> Land to the south east of the site bounded by the railway lines is currently under the ownership of Network rail and used as a maintenance depot</p> <p><b>Comment Noted - Amend</b></p> <p><b>Comment Noted – Amend</b> <b><i>Insert paragraph 2.1 to read:</i></b> <i>Sunderland Station lies in close proximity to the north of the site</i></p> <p><b>Comment Noted – Amend</b> <b><i>Amend to read:</i></b> <i>A collection of Grade II Listed Buildings occupies”.</i></p>
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	<p>primary regeneration benefits that are sought from this site are achieved. This text also explains that, while seeking a retail-led scheme on site, other uses will also be 'encouraged', including leisure, offices, restaurants and residential accommodation.</p> <p>Because of the size of the site and the required intensity of commercial uses, such as retail and leisure, and as a result of current market conditions, we doubt that any scheme on site will be conducive to the delivery of a significant residential component. In particular, we doubt that high density housing on this site would appeal to the market, as desirability would be affected by the intensity of the commercial uses and the impact that these may have on residential amenity. The issue of housing delivery does of course affect the viability and deliverability of any regeneration scheme.</p> <p>Policy B2A of the UDP Alteration No. 2 on Sustainable Urban Design provides the right framework for assessing the appropriateness of a mix of use in new development, based on location, character and function of the surrounding area, scale and nature of the development and physical constraints of the site (Para 10.29j).</p> <p>We suggest that the Comprehensive Development Site located in Sunnyside is a more suitable location for the delivery of high density housing in the Town Centre.</p> <p><b>Suggestion:</b> the focus of this Paragraph should be on the importance of enabling the delivery of a retail-led scheme in order to achieve the needed regeneration benefits within the City Centre. In this light, the emphasis should be on the 'encouragement', rather than 'requirement' of other uses in addition to retail, in order to create a vibrant place where people can enjoy themselves and relax throughout the day and evening. We suggest inserting reference to Para 10.29j of Policy B2A of the UDP Alteration No. 2 which provides the right framework for assessing any proposed mix of uses.</p>	<p><b>Comment Noted – No Change</b>  Policy SA55.1A of UDP Alteration No. 2 is adopted policy and 'requires' specific uses for the site. Residential development is identified as a required use.</p> <p>In addition policy H5A of UDP Alteration No.2 allocates 110 new houses for the Holmeside site in the period 2004 – 2012.</p> <p>As such the Development Framework must respond to the policy. It would be inappropriate for the Framework to allocate or encourage an alternative mix of uses that does not comply with the above policies.</p>
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**Infrastructure and Public Realm**

**General**

Many of these principles are too prescriptive and set out detailed design requirements/solutions. The following should be deleted or reworded in order to extrapolate the broader principle they intend to convey, in accordance with the prime function of the Framework.

**Bullet Point 2 - "The provision of a permanent canopy of architectural merit, covering the areas of public realm within the development"**

Objection: This is overly prescriptive and unnecessarily detailed. Any development should acknowledge the issue of inclement weather and the need to achieve a high quality and attractive environment. These two objectives should be translated into a broad design principle and reference to detailed design features and architectural or iconic qualities should be removed.

Suggestion: Reword Bullet Point 2 to read: "The provision of appropriate shelter features which complement the quality of the buildings and the overall public realm".

**Bullet Point 5 - "Deliveries and servicing will principally be from a central undercroft area linked to each of the building 'blocks' via service corridors"**

Objection: This is too prescriptive and unnecessarily detailed and restrictive in design terms. We suggest deleting this bullet point and replacing it with a broader principle/objective. This principle should recognise that in town centre developments servicing and delivery arrangements need to meet modern day user requirements and ensure that there is no adverse impact on highways and no detrimental visual impact on the street scene. This principle is partially repeated in Bullet Point 7.

**Suggestion:** Reword Bullet Point 5 to

**Comment Noted – No Change**

The requirement for a permanent canopy, described in the Development Framework reflects part of the main vision for the Holmeside project contained in the Design Code for the site. The Design Code forms part of the Development Agreement for the Holmeside site. It is established in the Code that the retail 'realm' should allow for pedestrian connections and **arcades**, which form the routes through the site and inter-connect at a central public space at the heart of the development. For consistency, reference to the permanent canopy should therefore be retained.

**Comment Noted – Amend**

Given the characteristics of the site, it is considered that undercroft deliveries would be a logical approach to servicing this site. However it is agreed that the requirement for a 'central undercroft area linked to each of the building blocks via service corridors' is too prescriptive. The Design Code for the site establishes design parameters for the servicing areas. It is considered that for consistency the Development Framework should refer to the requirements of the Code. Therefore:

**Amend paragraph 5.2 Bullet 5 to read:**  
*'Delivery and servicing arrangements should respond to the need of modern day operational requirements without affecting the quality and attractiveness of the streetscene and the safety of pedestrian and vehicular movement.*

*It should be ensured that all service areas are concealed from view, while allowing ease of*



	<p>read: “The provision of deliveries and servicing arrangements that respond to the need of modern day users without affecting the quality and attractiveness of the streetscene and the safety of pedestrian and vehicular movement”.</p> <p><b><u>Bullet Point 6 - “Any car parking will be provided primarily in undercroft or in existing/new build multi-storey blocks”</u></b></p> <p><b>Objection:</b> This is too prescriptive and should be reworded to reflect the fact that any car parking arrangement should make efficient use of the site and, when visible from Street level, should look visually attractive and not have a detrimental visual impact on the surrounding area.</p> <p><b><u>Movement General</u></b> Some of the key features envisaged by the movement strategy are unnecessarily prescriptive and appear to be unjustified. In particular, the following should be deleted or reworded in order to extrapolate the broader principle they intend to convey, in accordance with the prime function of the Framework.</p> <p><b><u>Paragraph 5.3 Point 2)</u></b> <b>Objection:</b> This point effectively elaborates Point 1) by prescribing detailed pedestrian nodes/connection points. While it is acknowledged that development should ensure pedestrian integration with the surrounding area, it is inappropriate and limiting for this Framework to set out specific connection points and nodes in design terms.</p> <p><b>Suggestion:</b> Reword Point 2) to read:</p>	<p><i>collection / delivery access. Buildings Services should be located away from main entrances and out of sight in visually impermeable screened enclosures that are integrated into the design of the buildings. Service areas must be located to avoid odours and noise affecting the public.’</i></p> <p><b>Comment noted – Amend</b> Again, it is considered that given the characteristics of the site, undercroft parking is a logical approach and this is to be retained. It should be noted that the Holmeside Triangle Design Code- which forms part of the development agreement for the site – stipulates that: ‘Car parking must be completely accommodated in multi-storey and undercroft blocks that do not detract from the aesthetic quality of the scheme.’ The Development Framework should reflect this. It is however recognised that it is for the masterplan to demonstrate the optimum approach to parking solutions.</p> <p><b>Amend paragraph 5.2 bullet 6 to read:</b> <i>Any car parking will be provided primarily in undercroft or in existing/new build multi-storey blocks. Car parking arrangements should make efficient use of the site and, when visible from street level, should look visually attractive and not have a detrimental visual impact on the surrounding area.</i></p> <p><b>Comment Noted – Amend</b> The principle of a centrally located public square reflects the vision for the site established in the Design Code for the Holmeside project, which states: ‘...routes through the site should inter-connect at a central public space within the heart of the development.’ As such it is appropriate for this document to include a requirement for a public space within the site.</p> <p>With regard to pedestrian routes, whilst it is acknowledged that the Development</p>
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	<p>“provision of convenient and attractive pedestrian routes between the public realm within the development site and the Park Lane Public Transport Interchange, the Bridges Shopping Centre and Holmeside and the Railway Station to the north”.</p> <p><b><u>Point 4)</u></b>  <b>Comment:</b> The Framework should make it clearer that any development proposal should explore the opportunity of linking the site to the Civic Centre Car Park, but that the delivery and desirability of this link should be assessed in the context of viability and practical issues such as railway operators’ agreement.</p> <p><b><u>Points 5 and 6</u></b>  <b>Comment:</b> Given the difference in levels across the site and the railway cutting, it is our view that reference to a potential vehicular and service/delivery access from Burdon Road is so improbable as to be misleading.</p> <p><b>Suggestion:</b> Delete the reference to potential access from Burdon Road, still retaining reference to alternative vehicular points being acceptable if it is proven that they work in highway terms.</p>	<p>Framework should provide broad principles for development and should avoid prescription, it is nevertheless considered that the document should also provide some guidance and vision as to how the site may best be developed. As such the inclusion of suggested connection points, nodes and routes is not inappropriate. However it is acknowledged that ultimately the masterplan is to demonstrate what the best design solution for the site is.</p> <p><b><i>Amend paragraph 5.3 point 2 to read:</i></b>  <i>Provision of convenient and attractive pedestrian routes which interconnect at a centrally located public square. It is considered that pedestrian routes should link the central space with Park Lane Public Transport Interchange, the Bridges shopping centre at the corner of Holmeside and Park Lane, and the corner of Holmeside and Waterloo Place. However the detailed Masterplan should identify the optimum linkages through the site.</i></p> <p><b>Comment Noted – Amend</b>  <b><i>Amend paragraph 5.3 point 4 to read:</i></b>  <i>The opportunity of linking the Holmeside triangle area across the railway line, to the civic centre car park, by way of a new pedestrian bridge link should be investigated. The feasibility and viability of this should be fully considered and assessed as part of any proposal and agreements obtained as necessary from the rail operators.</i></p> <p><b>Comment noted – No Change</b>  It is not considered necessary to delete the reference to Burdon Road. At this stage it is a consideration and should therefore be included in any transport assessment. In his report the UDP Inspector concludes that the availability of ‘...the third option for access is sufficient..(for me) to conclude that it would be possible for acceptable arrangements for access to be devised’. The Development Framework supports this conclusion by allowing for the <u>consideration</u> of this third option should it be necessary. The Council remains of the view that it is for the Developer through the Masterplanning process and the associated Transport assessment to determine the optimum access arrangements. However it should be noted that a 2004 Rail Crossing Feasibility Study by Scott Wilson concluded that although departures from standard construction methods may be required, a vehicular access bridge from Burdon Road to the Holmeside site could be feasible subject to</p>
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	<p><b><u>Design</u></b>  <b><u>Paragraph 5.6</u></b>  <b><u>Bullet Point .1 - Heights</u></b></p> <p><b>Objection:</b> This Section is confusing as it identifies buildings in excess of 6 storeys as landmark buildings while the typical height is envisaged to be 2-5 storeys. It is our view that, subject to a robust design rationale, the site can accommodate buildings of 6 storeys in selected locations. Furthermore, buildings of 6 storey in height are not 'tall buildings' and may not perform a landmark function, given the character of the area and the surrounding buildings. Bullet point 3 in this Paragraph already covers the principle of landmark buildings; therefore reference to them in Bullet Point 1 is an unnecessary repetition.</p> <p><b>Suggestion:</b> Reword the second sentence of Bullet Point 1 to read: "It is envisaged that new buildings will typically be 2-6 storeys in height, however where a building is proposed in excess of 6 storeys in height, any such proposal would be considered against the criterion of Policy B2B of the Alteration No. 2, national planning policy and best practice guidance in respect of tall buildings, as set out in Section 4 (or any subsequent guidance)."</p>	<p>approval from the Highways Authority and the Planning Authority. Listed Building Consent would also be required.  It will be necessary for the Transport Assessment to establish and demonstrate whether or not the option to access the Holmeside site from Burdon Road is required, feasible, deliverable or viable.</p> <p><b>Comment Noted – No Change</b>  This section has been prepared in accordance with the adopted Central Area Urban Design Strategy Supplementary Planning Document, which – on page 66 - states that:</p> <p><i>'Buildings within the central area will be acceptable within the range of 3 to 5 storeys in height having regard to the context of the area'</i></p> <p>It is further stated that:</p> <p><i>'Buildings of up to 6 storeys in height will be acceptable at important corners, gateway spaces and junctions to ensure a strong sense of enclosure and continuity having regard to the context of the area.'</i></p> <p>There is no suggestion in the Framework that Buildings of up to 6 storeys are 'tall buildings'. Nevertheless it is considered that in the context of Sunderland - and more specifically the Holmeside site - a 6 storey building would be relatively tall and could perform a landmark function. In recognition of this the above mentioned requirements of the CAUDS SPD are particularly relevant. The masterplan should give careful consideration to the location of 6 storey buildings and demonstrate that these buildings are sited at locations that meet the criteria of the SPD.</p> <p>The CAUDS SPD further states that:</p> <p><i>'Tall landmark buildings over 6 storeys in height will be acceptable if they are of outstanding architectural quality and add positively to the townscape qualities of the central area. The location of tall landmark buildings will reflect the distribution of existing tall buildings in the central area.'</i></p> <p>And:</p> <p>In considering tall buildings...reference will also be made to the CABA/English Heritage 'Guidance on Tall Buildings' (July 2007) and any subsequent relevant guidance.</p>
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	<p><b><u>Bullet Point 3- Streetscape and Landmark Buildings</u></b></p> <p><b>Comment:</b> While this Bullet Point mentions that landmark buildings will be located at key positions within the development area, the Diagram in Appendix 4 shows only one possible location and is therefore too restrictive. In line with the comments made on the Framework Diagram in the Introduction to this letter, we suggest that this Diagram is completely removed or reworked to be more indicative (see relevant section below).</p> <p><b>Suggestion:</b> Reword Bullet Point 3 to read: “Storey heights and block articulation respond to the local streetscape and topography of the area. The Masterplan should identify</p>	<p>It is buildings of <u>over</u> 6 storeys, which are considered tall, landmark buildings and accordingly these should be assessed against the criteria in Policy B2B of UDP Alteration Number 2</p> <p><b>Therefore:</b></p> <p><b><u>Amend paragraph 5.6 create new Bullets 3 4 and 5 to read:</u></b>  <i>Development provided is of a distinctively urban character, mass and scale, through a high density and compact development. In accordance with the adopted Central Area Urban Design Strategy SPD it is envisaged that new buildings will typically be 2-5 storeys in height.</i></p> <p><i>In accordance with the adopted Central Area Urban Design Strategy SPD, buildings of up to 6 storeys in height will be acceptable at important corners, gateway spaces and junctions to ensure a strong sense of enclosure and continuity having regard to the context of the area.’</i></p> <p><i>Where a landmark building is proposed in excess of 6 storeys in height, any such proposal should be of outstanding architectural quality and add positively to the townscape qualities of the central area. Such proposals would be considered against the criterion of Policy B2B of the Alteration No.2, national planning policy and best practice guidance in respect of tall buildings, as set out in Section 4 (or any subsequent guidance);</i></p> <p><b>Comment Noted – Amend Amend heading on Framework principles plan Appendix 4 to read:</b>  <i>‘Indicative Development Framework Diagram’</i></p> <p><b>Amend key in Appendix 4 to list features as ‘potential’:</b> e.g <i>‘Potential landmark/Gateway building(s) etc.</i></p> <p><b>Comment Noted – Amend Amend paragraph 5.6 create new bullet 2 to read:</b>  <i>‘Storey heights and block articulation should respond to the local streetscape and topography of the area. The Masterplan should identify opportunities for landmark buildings in</i></p>
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	<p>opportunities for landmark buildings in key and gateway/entrance locations within the development area.”</p> <p><b><u>Sustainability</u></b></p> <p><b><u>Para 5.8</u></b></p> <p><b>Suggestion:</b> This Paragraph should simply repeat the text of Policy 38 of the North East of England Plan without reinterpretations. This Policy is very strong on the point that an assessment based on viability and feasibility is key to the ultimate delivery of the 10% target.</p> <p><b>Suggestion:</b> Replace the text of this Paragraph with the text contained in Policy 38 of the North East of England Plan: “In advance of local targets being set in DPDs, major new developments of more than 1000m2 of non-residential floorspace should secure at least 10% of their energy supply from decentralised and renewable or low-carbon sources, unless, having regard to the type of development involved and its design, this is not feasible or viable”.</p> <p><b><u>Paragraph 5.9</u></b></p> <p><b>Suggestion:</b> This Paragraph should also contain reference to viability and to the provisions of Policy B2A of the UDP Alteration No. 2. We suggest rewording the Paragraph to read: “In line with the provisions of Policy B2A of the UDP Alteration No. 2, all development should achieve high energy efficiency and minimise energy consumption. All new buildings on site should aspire to achieve ‘very good’ BREEAM rating, subject to a balanced consideration of viability issues, regeneration benefits and overall design quality of the development. The achievement of ‘excellent’ rating should be explored and, when feasible, this rating should be attained.”</p>	<p><i>key and gateway/entrance locations within the development area as suggested on the indicative Development Framework Diagram (see Appendix 4)’</i></p> <p><b>Comment Noted – Amend</b>  <b>Amend paragraph 5.8 to read</b>  <i>‘In accordance with policy 38 of the North East of England Plan and in advance of local targets being set in DPDs, major new developments of more than 10 dwellings or 1000m2 of non-residential floorspace should secure at least 10% of their energy supply from decentralised and renewable or low-carbon sources, unless, having regard to the type of development involved and its design, this is not feasible or viable. This must be demonstrated by means of a Sustainability Statement, which must be submitted as part of a planning application for the site.’</i></p> <p><b>Comment Noted – Amend</b>  Paragraph has been amended in order to achieve consistency with UDP Alteration No. 2 Policy B2B and the requirements of the Holmeside Triangle Design Code, which forms part of the Development Agreement for the site.</p> <p><b>Amend paragraph 5.9 to read</b>  <i>In line with the provisions of Policy B2A of the UDP Alteration No. 2 and the Holmeside Triangle Design Code, all development must achieve high energy efficiency and minimise energy consumption. Designs must be audited against the sustainable assessment programmes BREEAM and Code for Sustainable Homes. Buildings assessed under BREEAM must achieve ‘very good’ or ‘excellent’ rating. Residential development must achieve Code levels 3 or 4. This should be subject to a balanced consideration of viability issues, regeneration benefits and</i></p>
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	<p><b><u>Comprehensive Development General</u></b></p> <p>With the exception of the Diagram in Appendix 4, the Framework fails to make reference to the triangular piece of land off Burdon Road that is earmarked for “Landscape Improvements”. This Section should provide a justification for the inclusion of this land in the Holmeside Triangle Development Area and the proposed improvements. It should also set out why and how this site would contribute to the comprehensive redevelopment of the area.</p> <p><b><u>Paragraph 5.10</u></b></p> <p><b>Suggestion:</b> Reword the end of this Paragraph to read: “...., which could potentially include at least one anchor retail unit.” Delete: “..in <u>the form of a food and non-food supermarket/superstore</u>” as it is unnecessary.</p> <p><b><u>Paragraph 5.11</u></b></p> <p><b>Objection:</b> This is too prescriptive and there is no design rationale behind it. It is the role of the Masterplan to justify and identify sightlines and focal points within the surrounding area. The broad principle that this Framework should focus on relates to visual cohesion and connectivity with the surrounding area and the creation of a legible place by providing through routes to link the development with the surrounding areas.</p> <p><b>Suggestion:</b> Reword the entire Paragraph to read: “It is important that development on the Holmeside</p>	<p><i>overall design quality of the development and demonstrated through a Sustainability Statement. The achievement of ‘excellent’ rating should be explored and, when feasible, this rating should be attained.”</i></p> <p><i>Energy design advice must be sought early in the design process.</i></p> <p><b>Comment Noted Amend</b></p> <p>The UDP boundary includes the triangular piece of land of Burdon Road and as such consideration of this site should be included within a masterplan for the site.</p> <p><b><i>Insert paragraph at 5.12 to read</i></b></p> <p><i>The triangular area of land located to the east of the site is under the ownership of Network Rail and currently used in relation to the operation of the Rail Line. It is envisaged that the current use of the land will continue; however the masterplan should identify opportunities for this area and consider any implementation and delivery issues. Options will be considered on their own merits and in the context of the Framework, Masterplan and UDP Alteration No. 2 Policy.</i></p> <p><b>Comment noted – No Change</b></p> <p>The Development Framework acknowledges rather than specifies the opportunity for a retail unit in the form of a food and non-food supermarket/superstore</p> <p><b>Comment noted – No Change</b></p> <p>The purpose of the Development Framework is to provide broad principles for development and to avoid being over-prescriptive. Paragraph 5.11 clearly states that the design principles are an ‘aspiration’. In addition the paragraph recognises that it is for the Masterplan to demonstrate the optimum means of achieving the aspired sight lines into and out of the site and the best location for the pedestrian routes that link the area with the surrounding areas:  ‘..Any masterplan should fully assess whether such sightlines are necessary to achieve the highest possible quality of built environment..’</p>
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Triangle is visually connected with the surrounding areas, and this could be achieved through sightlines along the identified public pedestrian routes through the site. The Masterplan should identify the potential for and locations of sightlines, focal points and vistas so that the areas of Holmeside and Park Lane are visually integrated with the new development.”

**Diagram (Appendix 4)**

**Objection:** As it conveys some of the overly prescriptive design principles contained in the Framework, this Diagram does not provide an appropriate tool to assess a Masterplan for the site with an open mind in terms of design solutions and achievement of the design objectives.

The Diagram is also restrictive as it identifies only one location for landmark buildings, while it is the role of the Masterplan to identify appropriate locations at gateways, entrances and prominent corners.

The identification of vehicular and service access points and circulation is overly prescriptive, limited and fixed with no apparent design justification. It is the role of the Masterplan to identify access points for vehicles and deliveries and justify these in the light of the design principles contained in the Framework.

It is also inappropriate for the Diagram to indicate a distribution and zoning of uses on site as this matter is entirely for the Masterplan to establish and justify.

The identification of the triangular piece of land off Burdon Road for “Landscape Improvements” is gratuitous and not justified by a design rationale. What is proposed (landscape improvements) may not be realistic as a result of ownership constraints and operational considerations. It is also inappropriate for this Framework to suggest that the Holmeside Triangle Development should be burdened with the delivery of improvements on this land which is clearly segregated from the main site. The Framework should make it clear

	<p>that the delivery of any improvements or development identified by the Masterplan for this site should be assessed on the basis of viability and other implementation issues.</p> <p><b>Suggestion:</b> Delete this Diagram altogether or label it to read: <b>“Indicative Framework Diagram”</b>. In addition all key entries (with the exception of “Listed Buildings to be protected/enhanced” and “Mowbray Park: Park and Garden of Special Historic Interest”) should be relabelled “potential” or “indicative”.</p> <p>Reference to the landmark building should be removed or the red circle should be re-labelled as “example of potential landmark location”.</p> <p>The shading of the site should be in one colour only with the key reading “mixed use retail-led development and public realm.”</p> <p>The area identified for “Landscape Improvements” should instead be labelled as “Masterplan to identify opportunities for this area and to assess implementation/delivery issues”.</p>	<p><b>Comment Noted – Amend</b>  <b>Amend heading in Appendix 4 to read:</b>  <i>‘Indicative Framework Diagram’</i></p> <p><b>Amend key entries to read:</b>  <i>Potential and indicative where relevant</i></p> <p><b>Comment noted - Amend</b></p> <p><b>Comment Noted - Amend</b>  <b>Amend shading to identify area of mixed use retail-led development.</b>  Public realm will continue to be identified separately and towards the centre of the site where routes converge, in accordance with the vision of the Holmeside Triangle Design Code.</p> <p><b>Comment Noted - Amend</b></p>
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