

**21 September 2017**

**Sunderland Core Strategy and  
Development Plan 2017 – 2033  
Draft Plan**



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**Report of Regeneration and Economic Development**

**Ian Thompson, Corporate Director of Regeneration and Economic  
Development**

**Councillor Carl Marshall, Cabinet Portfolio Holder for Economic  
Regeneration**

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**Purpose of the Report**

This report considers the Sunderland City Council's Core Strategy and Development Plan, Draft Plan, which together with other associated consultation and evidence based documents were published for consultation on 7 August 2017. Comments are required by 2 October 2017. It is recommended that the draft letter in Appendix 2 of this report is endorsed as the Council's response.

**Background**

1. Sunderland City Council (City Council) is in the process of preparing a Local Plan for the City of Sunderland (City). It is being prepared in three parts. Once adopted the Local Plan will consist of:
  - A Core Strategy and Development Plan (CSDP) document which will set out an overarching strategy for future change and growth in the City and will include detailed development management policies and strategic allocations and designations;
  - An Allocations and Designation Plan which will set out site specific policies for the development, protection and conservation of land in Sunderland; and
  - (iii) An International Advance Manufacturing Park (IAMP) Area Action Plan, which will set out site specific policies for the land to the north of the existing Nissan Automotive Plant.

In addition the City Council is also intending to prepare five Supplementary Planning Documents (SPDs) including a South Sunderland Growth Area (SSGA) SPD which is also currently being consulted upon.

2. The City Council have been preparing its CSDP document for over a decade however, in the past two years have developed what can be considered an issues and options stage document and a preferred options document (the subject of this report). The first formal consultation stage having occurred on Issues and Options in November 2005, Preferred Options in December 2007, Alternate Approaches in September 2009, revised Preferred Options in February 2013 and a Core Strategy Growth Options report in May 2016.
3. The City Council now have an ambitious time table for the preparation of the CSDP. The revised Local Development Scheme (July 2017) advises that following the current stage of consultation under Regulation 18, that the CSDP

will reach its Publication Stage in late 2017, with Submission in early 2018, followed by examination in summer 2018 and with adoption in early 2019.

4. The County Council last considered the City Council's emerging CSDP in May 2016 and provided comments on their Core Strategy Growth Options Consultation. The submitted comments sought to ensure that the assumptions made in developing the City Councils' scenarios for housing were compatible with County Durham's. Specifically, detailed comments were made in relation to both the commuting ratio and the established migration relationship between Sunderland and County Durham.

### **The CSDP**

- 5 The CSDP aims to establish a policy framework that guides and shapes development in the City to 2033. It explains that it seeks to ensure that Sunderland is a City that is open for business and growth, providing jobs and prosperity for local people, delivering housing to meet the needs of all of the City's communities and tackling deprivation within the city. It describes the key characteristics of the City and identifies twenty eight specific challenges that the strategy within the CSDP will need to respond to relating to matters such as its demographic and economic health; leisure, culture and shopping offer; living in the City; the natural and historic environment; water and flooding; health; transport and accessibility; digital network; and minerals and waste.
- 6 The core basis of the CSDP is focussed around:
  - Facilitating economic growth and creation of at least 10,337 new jobs. It explains that this will be achieved by retaining Primary and Key Employment Areas for economic regeneration and development; delivering the International Advanced Manufacturing Park (IAMP); prioritising the urban core as the principle locations for office and retail; and the development of the former Vaux Brewery site in the city centre for mixed use regeneration.
  - Creating sustainable neighbourhoods by delivering at least 13,824 net additional homes by:
    - Re-balancing the housing stock by providing a range of housing, including an increased supply of larger family housing, accommodation to meet the needs of an ageing population and bringing empty properties back into use;
    - Focussing the majority of new housing development within existing communities;
    - Supporting housing renewal and regeneration;
    - Development of the SSGA to provide over 3,000 new dwellings;
    - Amending the existing Green Belt boundary and allocating fifteen Green Belt housing release sites in Washington, North Sunderland and the Northern Coalfields; and
    - Safeguarding land to meet anticipated longer-term needs beyond the Plan period.

### Objectively Assessed Need

- 7 The CSDP explains that after a period of population decline in recent decades, Sunderland is growing again. The population of the City is forecast to grow from

277,406 people (in 2015) to 285,560 people by 2033. In the same period, the forecasts indicate that the number of households will grow by 9,963 representing an 8% increase. However, CSDP explains that the forecast population growth would not be sufficient to support the anticipated level of jobs growth within the city. That this is primarily as a result of the ageing population and the out-migration of economically active households which the CSDP seeks to stem by providing greater housing choice within the City. It explains that 13,824 net additional dwellings are required over the plan period to meet the forecast Objectively Assessed Need (OAN), which is an average of 768 dwellings per annum, and sustain the city's population, support the future job growth and reduce the amount of in commuting into the city. Policy H2 (Housing Delivery) explains that between 2015-2022, the annual housing target will be a minimum of 720 dwellings per annum and that between 2022-2033 the annual housing target will be a minimum of 800 dwellings per annum.

- 8 From a County Durham perspective, further understanding is required on the assumptions made as part of Objectively Assessed Need for Housing (OAN) in Sunderland, what implications these have for County Durham and how they relate to the assumptions made within the scenarios modelled as part of the Issues and Options Stage County Durham Plan. It is noted that the CSDP seems to provide a different narrative to the assumptions modelled in the Sunderland's evidence base and clarity is sought from Sunderland on the commuting and migration assumptions incorporated as part of OAN and underpinning the policy approach.

#### Approach to Housing Delivery

- 9 The CSDP explains that it has sought to maximise the delivery of housing within the built up area of the city and significant work has been undertaken through an assessment of potential housing sites and densities through the 2017 SHLAA, a review of existing employment land, existing settlement breaks, the city's white land, the city's greenspace and remaining Unitary Development Plan allocations. In addition it explains that remaining viable brownfield sites are limited and the scope of neighbouring authorities to accommodate development has all been considered, but it was found not to be possible to accommodate the forecast levels of housing need within the existing urban area. Following a comprehensive review of the Green Belt the CSDP explains that the limited capacity of the urban area to meet the city's growing population represents the exceptional circumstances that justify the release of land from the Green Belt for housing development.

#### Strategic Allocations

- 10 The CSDP also seeks to focus new development through four strategic allocation policies including Policy SA1 which allocates the former Vaux Brewery site for mixed use development including a new Central Business District comprising 60,000m<sup>2</sup> of office space, a hotel and living accommodation; Policy SA2 which allocates 227ha of land for a residential growth area at South Sunderland; Policy SA3 which allocates fifteen Green Belt housing release sites; and Policy SA4 which deallocates and safeguards 100ha of land from the Green Belt east of Washington for future development beyond 2033.

#### South Sunderland Growth Area (SSGA)

- 11 This strategic allocation takes forward two unimplemented residential allocations (Chapel Garth and Cherry Knowle) from the existing Unitary Development Plan (UDP) along with an unimplemented employment allocation (South Ryhope) and

a site currently allocated as Settlement Break (Land North of Burdon Lane) in the UDP. The SSGA is intended to deliver approximately 3,000 new homes, meeting 20% of the City's future housing need, (including 10% which would be affordable) together with a new primary school, a local centre, community and cultural facilities, open space, woodlands, cycle ways and footpaths and the completion of the Ryhope-Doxford Link Road (RDLR).

- 12 The SSGA will result in a significant increase in the population of South Sunderland including on two sites close to the County boundary. South Ryhope, which lies directly to the north of Seaham where approximately 450 dwellings are proposed and Cherry Knowle Hospital Site which lies to the north of the A19. Planning permission was granted for on the Cherry Knowle Hospital Site for 800 dwellings in June 2017. In addition planning permission was granted for 750 dwellings at Chapel Garth for 750 dwellings in December 2016. No planning application has yet been made for the Land North of Burden Lane but the anticipated capacity of the site is nearly 1000 dwellings.
- 13 The SSGA has the potential to generate substantial trips across the Durham border and onto Durham's strategic and local highway network, and in particular it could cause congestion on key roads and junctions near Seaham. Travel data collected in Durham demonstrates that currently, some trips from the south of Sunderland to the A19 northbound currently make their way southwards into Seaham before joining the A19 northwards. Jacobs were also commissioned to update and expand the existing Sunderland Highway Improvement Model (SHIM) and the report which was produced in 2014 states that traffic is expected to grow by 4.6% across the boundary to Easington above baseline as a consequence of the SSGA and that two local road junctions in County Durham will be over capacity in 2032 as a direct result of the SSGA, namely:
  - Seaton Lane/Lord Byron's Walk (in County Durham); and
  - A19/A1018/B1404 Seaton Intersection (in County Durham, Trunk Road Junction).
- 14 The RDLR is planned to run along the southern boundary of the built up area of Tunstall and Ryhope, linking Ryhope to the A19 with Tunstall and Doxford Park. This road is listed as critical infrastructure to the SSGA area and will serve a strategic purpose as well as providing access to the housing sites. Prior to the submission of the CSDP the Council will need to understand whether this road would direct traffic to the A19 and together with Highways England, understand the implications for the A690/A19 junction. In addition Capita were commissioned to undertake further transport modelling and a further report was published in 2017 although this looked only at the detail of traffic flows within Sunderland. These cross boundary traffic impacts have all been raised with the City Council through duty to cooperate discussions and the City Council recognise that further work is required to understand, assess and identify individual and cumulative traffic impacts within County Durham and identify suitable mitigation.
- 15 The Council has also considered the educational impacts of these proposals and consider with the proposed mitigation proposed by Sunderland which includes the provisions of a new primary school and extension of two existing schools and increased places in existing secondary schools that the proposed residential growth would not have an adverse impact on educational provision in County Durham.

- 16 The most significant potential environmental concern from the SSGA is the potential impact of the SSGA housing sites upon the Durham Coast Special Area of Conservation (SAC), Durham Coast Special Protection Area (SPA), Northumbria Coast Ramsar and the defined Heritage Coast of Sunderland and County Durham, all of which lie adjacent to the South Ryhope site allocation. It is understood that there is no mention of the Heritage Coast in the appraisal for the SSGA and this is considered by the County Council to be an omission which needs to be addressed by the City Council.
- 17 In relation to the Durham Coast SAC, SPA and Northumbria Coast Ramsar, the HRA screening exercise which has been undertaken concluded that development within 6 km of the European sites has the potential to result in increased visitor pressure, which may in turn result in increased recreational disturbance of birds. However, the City Council's HRA screening exercise concluded that these impacts could be mitigated by providing additional areas of additional natural greenspace (AANG) and when the proposed mitigation measures are adopted and the residual effects re-assessed against the conservation objectives for each site the HRA screening exercise concluded that the SSGA will not have an adverse effect on the integrity of Durham Coast SAC, or Northumbria Coast Ramsar either alone or in-combination with other plans and projects. Council officers will discuss the conclusions of the HRA with the City Council in relation to the compatibility with the Council's own emerging Local Plan and its HRA. However, it is Natural England's role to closely consider the HRA and the individual and in combination impacts of proposals on the internationally designated sites both inside and outside of Sunderland and that this should ensure that there are no unacceptable adverse impacts upon European Sites.

#### Green Belt Deletion Sites

- 18 The CSDP seeks to accommodate approximately 1,500 dwellings in the Tyne and Wear Green Belt on fifteen sites covering a total of 104.8ha. In addition a further 100ha of land north-west of Washington has been identified to be safeguarded for longer term development needs beyond the Plan period. Two of the Green Belt housing release sites lie near or adjacent to the County boundary:
- Site HRS7, known as 'Southern Area Playing Fields at Rickleton' is an 18.66ha site which could accommodate approximately 202 dwellings. This site lies directly to the north and adjacent to Lambton Castle Grade II Park and Garden of Special Historic Interest. However, there is no recognition of this nationally important designation in the site constraints appraisal, with residential blocks shown right up to the boundary of the designated site on the indicative layout. The constraints appraisal for the site does, however, note that Rickleton Woods lie to the south of the site and that the woods would require a buffer. Nonetheless, it is considered that consideration should be given how this proposed housing site affects the setting of the designated site and how any adverse effects can be satisfactorily mitigated, for example by including greenspace at the boundary of the proposed housing site. The park boundary is a notable feature which would need to remain legible and accessible for maintenance; and
  - Site HSR6, 'Land at James Steel Park, Fatfield' is a 5.2ha site which could accommodate approximately 32 dwellings. This site lies less than 200 metres to the north of Lambton Estate Park and Garden of Local Interest. However, no recognition of the proximity of this locally designated site has been provided in the site constraints appraisal. While it is noted that mature tree belts surround the site and the existing Washington Highway (A182) which

lies to the south of the site may effectively screen the housing site. Nonetheless, it is considered that consideration should be given to how this proposed housing site affects the setting of the designated site and how any adverse effects can be satisfactorily mitigated.

#### Strategic and Development Management Policies

- 19 The CSDP also contains a range of strategic and detailed development management policies relating to a range of matters relating to: health and well-being; new homes; economic prosperity; the environment; climate change and water; transport and waste and minerals. Where not addressed above an overview is provided of each section and where relevant issues of cross boundary strategic and local significance in relation to these matters are raised below.

#### Health, Well Being and Social Infrastructure

- 20 This section of the CSDP includes three policies addressing such matters as health and well-being; the protection and delivery of community sport, social and cultural facilities; and culture, leisure and tourism. The Culture, Leisure and Tourism Policy specifically mentions the aspiration of the City Council to particularly support leisure and tourism proposals on the coast, however there is no consideration within this policy of how this will be balanced with the protection of the defined Heritage Coast and environmentally sensitive sites, this is considered as a potential omission from the CSDP which should be addressed. None of the other policies raise issues of strategic or local importance with County Durham.

#### New Homes

- 21 This section of the CSDP includes nine policies addressing such matters as sustainable neighbourhoods; housing delivery; housing mix; affordable housing; student accommodation; travelling show people, gypsies and travellers; houses in multiple accommodation (HMO). With the exception of the housing delivery policy, which is addressed above, none of these policies raise issues of strategic or local importance with County Durham.

#### Economic prosperity

- 22 The section of the CSDP includes twelve individual policies addressing matters such as economic growth; primary and key employment areas; new employment areas; offices; the retail hierarchy; retail impact assessment; and hot food takeaways. The CSDP seeks to put in place policies to deliver the City Council's growth ambitions. In particular, the CSDP seeks to deliver an automotive focussed IAMP on 100ha of land to the north of Nissan (with an additional 50ha safeguarded for future development), and by allocating an additional 95ha of employment land for B1, B2 and B8 uses. Specific measures include encouraging the development of new employment sectors which will diversify the economy and support the City's long term economic growth including: seeking to attract low carbon businesses and technologies to key areas including the A19 Corridor Enterprise Zone; prioritising the city centre for office development; supporting development which assist in the creation of Sunderland as a University City; exploiting the potential of the Port of Sunderland; promoting the development of the tourism, leisure, heritage and cultural sectors; and encouraging investment in education and training. None of the policies raise issues of strategic or local importance with County Durham.

## Environment

- 23 This section of the CSDP contains twenty individual policies relating to both the natural and built environment including policies relating to issues such as urban design, the public realm, historic environment, heritage assets, green infrastructure, biodiversity and geodiversity, landscape character and development in the open countryside. None of these policies raise issues of strategic or local importance with County Durham. However, it is noted that there is no policy within the CSDP which relates to the defined Heritage Coast which extends from Saltfern Rocks in Sunderland southwards into County Durham. Given that the National Planning Policy Framework advises that local planning authorities should seek to maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, this is considered as a potential omission from the CSDP which should be addressed. This should help ensure that there are no direct or indirect unacceptable adverse impacts upon the Heritage Coast in County Durham.

## Climate Change

- 24 This section of the CSDP contains eight policies relating to matters such as climate change and water; decentralised renewable and low carbon energy; energy from waste, flood risk; surface water management and water quality. None of these policies raise issues of strategic or local importance with County Durham.

## Transport

- 25 The section of the CSDP contains seven policies relating to matters such as promoting sustainable travel; connectivity and the transport network; city centre movement; the Port of Sunderland; the local road network; new development; and digital infrastructure.
- 26 Policy CC2 seeks to deliver a variety of highways schemes and other schemes to improve the transport network, reduce congestion and encourage walking and cycling. In terms of highways schemes with potential cross boundary impacts the Ryhope to Doxford link road and the SSGA are addressed above. Paragraph 12.8 of the CSDP advises that the City Council will continue to work with County Council to investigate the possibility of completing the Coal field Regeneration Route in the longer term, through the southern coalfield. This is a matter which will be discussed further with the City Council through duty to cooperate discussions. The CSDP also seeks to secure improvements to the Metro and Rail Network within the City and refers to the safeguarding of the Leamside Line and that the City Council will continue to work with its partners and transport infrastructure stakeholders to investigate the potential of this line and will support proposals that will benefit the City. It is recommended that the safeguarding of the Leamside Line is welcomed as reinstatement of this line in the long term could provide additional rail capacity in the North East, supplementing that available on the East Coast Main Line.

## Minerals and Waste

- 27 The minerals and waste section of the CSDP contains ten individual policies addressing policy matters such as waste management; new waste facilities; safeguarding waste facilities; mineral extraction; mineral safeguarding and opencast coal. A key concern of this section is that it lacks a quantitative basis and instead relies upon supporting evidence base documents including the Joint

Local Aggregate Assessment for County Durham, Northumberland and Tyne and Wear (January 2017) and the Sunderland City Council Waste Arisings and Capacity Requirements Report (July 2017). This is unsatisfactory as it means that the CSDP does not contain sufficient information on the scale of aggregate minerals working or waste management provision that it seeks to deliver over the Plan period or provide the basis for any required allocations. It is considered that this clarity is required in the CSDP in order to understand the intended contribution of Sunderland to meeting the future need for aggregate minerals and waste and the potential impacts on County Durham.

- 28 Paragraph 3.83 explains that a future challenge in the next five years is that all three existing landfills<sup>1</sup> in the City are due to close. However, other than a passing reference within paragraph 13.8 to a shortage of capacity for landfill energy from waste or thermal treatment, this issue does not appear to be addressed further in the CSDP. Instead this matter is left to be addressed within the Council's 'Waste Arisings and Capacity Report' which explains that the capacity gap for both non-hazardous landfill which from 2023 would be between around 72,000 under baseline recycling scenario and 53,000 tonnes under the increased recycling scenario. It also explains that there will be a significant inert landfill capacity gap throughout the majority of the Plan period of around 363,000 tonnes in 2020, rising to around 438,000 tonnes in 2021 and then reducing to around 427,500 tonnes from 2030 under baseline recycling with similar figures under the increased recycling scenario.
- 29 The CSDP refers to the need for duty to cooperate discussions with those areas where landfill capacity would be sought. This is important because, three of the five<sup>2</sup> remaining inert landfill sites within which this capacity currently remains are located within County Durham and in total these sites contained an available capacity of 8 million cubic metres at the end of 2015. However, of these three sites County Durham sites, the existing planning permissions at two of these sites require restoration before the end of Sunderland's plan period. Crime Rigg Quarry is required to be restored by 31 December 2024 and Old Quarrington and Cold Knuckles Quarry is required to be restored by 3 July 2026. At the final site, Bishop Middleham Quarry, significant quantities of void space will not become available until after mineral extraction has ceased in 2029. In relation to two other sites within the region the current planning permission at Hollings Hill Quarry in Northumberland requires tipping to end in 2028 with restoration by 2030 and Marsden Quarry in South Tyneside requires the extraction, landfilling and restoration to be completed by 31 December 2027.
- 30 The Waste Arisings and Capacity Report also refers to Sunderland, following the closure of its own landfill sites, being reliant upon non-hazardous landfill void space elsewhere in the North East including County Durham, Northumberland, Tyne and Wear and the Tees Valley. While it also refers to over 13 million cubic metres of non-hazardous landfill space being available it also refers to one site (Joint Stocks) in County Durham which does not have available capacity because this site has closed. It is important to note that at the time the CSDP document was published no duty to cooperate discussions had been held

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<sup>1</sup> Field House Farm, Houghton le Spring; Houghton le Spring Landfill Site, Houghton Le Spring and Springwell Quarry, Wrekenton.

<sup>2</sup> These inert sites are Bishop Middleham Quarry, Crime Rigg Quarry and Old Quarrington and Cold Knuckles Quarry all of which are in County Durham and Marsden Quarry in South Tyneside and Hollings Hill Quarry Landfill in Northumberland.



regarding the possibility of accommodating inert or non-hazardous waste in County Durham.

- 31 Policy WM3 seeks to safeguard strategically important waste management sites from loss and from encroaching development. While welcomed in principle, it is noted that this policy appears to only safeguard existing and planned facilities required for the management of Local Authority Collected Waste (LACW). As a matter of principle it is considered that all strategically important facilities for all waste streams should be safeguarded from loss and encroaching development thereby protecting their capacity, ensuring their availability and minimising the pressure for new facilities in the City of Sunderland or in adjoining waste planning authority areas. Paragraph 13.23 refers to the JBT Waste Services Transfer Station as of importance to the management of LACW in the City and paragraph 13.24 suggests that Policy WM3 seeks to protect these facilities where they are strategically important. It should be noted that the JBT site lies in Chester-le-Street which is in County Durham.
- 32 Policy WM6 addresses mineral safeguarding areas. The Council supports the broad approach of the City Council to mineral safeguarding.
- 33 Policy WM7 addresses opencast coal extraction. While it is considered that the scale of future opencast coal working will be significantly less than in the past that in the past it is considered important that Mineral Planning Authorities seek to ensure a consistent policy approach to opencast coal across the Durham Coalfield. On this basis it is suggested that policy WM7 should be revised. Currently, criteria (3) of Policy WM7 requires a consideration of 'city wide' benefits, however, to be consistent with paragraph 149 of the National Planning Policy Framework (NPPF) the policy should instead require consideration of 'national' benefits instead. Furthermore, it is also recommended that criteria (1) of this policy should be reconsidered as 'need' for coal extraction is not a matter which paragraph 149 of the NPPF requires to be considered.

#### Duty to Cooperate

- 34 Section 20(5)(c) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that Local Planning Authorities engage constructively, actively and on an ongoing basis with a range of local authorities and prescribed bodies in order to maximise the effectiveness of Plan preparation with regards to strategic cross boundary matters. The Council and City Council have consulted one another on each other's respective documents and engaged in duty to cooperate meetings. Further engagement will be required in order to ensure both Councils can successfully demonstrate to future Local Plan Inspectors that the duty to cooperate test has been met.

#### **Conclusions**

- 35 This report has considered the potential cross boundary impacts of the CSDP upon County Durham's strategic interests, environment and the amenity of local communities. Seeking the delivery of at least 13,824 net additional homes by 2033 including approximately 3,000 dwelling in the SSGA and 1,500 dwellings on 15 Green Belt deletion sites, housing provision is a fundamental element of the CSDP. From a Council perspective further understanding is required on the assumptions made as part of the OAN for housing in Sunderland, what implications these have for County Durham and how they relate to the assumptions made within the scenarios modelled as part of the Issues and Options Stage County Durham Plan. It is noted that the CSDP seems to provide a different narrative to the assumptions modelled in the City Council's evidence

base and clarity is sought from the City Council on the commuting and migration assumptions incorporated as part of OAN and underpinning the policy approach.

- 36 The SSGA has the potential to generate substantial trips into County Durham and onto the strategic and local highway network in County Durham. The Council requires further information on how the impact of the SSGA on the road network including that in County Durham will be mitigated. The most significant potential environmental concern from the SSGA is the potential impact of the SSGA housing sites upon the Durham Coast Special Area of Conservation (SAC), Durham Coast Special Protection Area (SPA), Northumbria Coast Ramsar and the defined Heritage Coast of Sunderland and County Durham, all of which lie adjacent to the South Ryhope SSGA housing site allocation. Council officers will discuss these matters with the City Council.
- 37 In relation to the two Green Belt housing allocations adjacent to Lambton Castle in County Durham and the related Park and Garden of Special Historic Interest and Park and Garden of Local Interest. It is considered important that the City Council consider the impact of these potential housing sites in relation to these nationally and locally important designations. This should include an assessment of how these proposed housing sites affect the setting of the designated site and how any adverse impacts can be satisfactorily mitigated.
- 38 In relation to transport, further discussions are considered to be required upon a number of matters as outlined above. In addition, the proposed safeguarding of the Leamside Line is welcomed.
- 39 In relation to the environment, in addition to the matters identified in relation to transport and the SSGA, and Lambton Castle, it is considered that the CSDP would benefit from the inclusion of a specific policy on the Heritage Coast. This would assist in ensuring that there are no direct or indirect unacceptable adverse impacts upon the Heritage Coast in County Durham. Furthermore, it is noted that the Culture, Leisure and Tourism Policy specifically mentions the aspiration of the City Council to support leisure and tourism proposals at the coast, however there is no consideration within this policy as to how this will be balanced with the protection of the Heritage Coast and environmentally sensitive sites.
- 40 In relation to minerals and waste, a range of matters have been identified, these include the possibility of the CSDP including quantitative information in relation to the scale of waste management and aggregates minerals that need to be planned for during the plan period; the importance of discussions relating to the availability of void space for inert and non-hazardous landfill following the closure of all three remaining landfill sites in Sunderland; waste site and mineral safeguarding; and the approach to opencast coal within the CSDP.

## **Recommendation**

- 41 That the Council endorse the draft letter set out in Appendix 2 of this report.

## **Background papers:**

1. Sunderland Core Strategy and Development Plan 2017 – 2033 Draft Plan.

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**Contact: Jason McKewon Tel: 03000 263 403**

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## **Appendix 1: Implications**

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**Finance – None**

**Staffing – None**

**Equality and Diversity** – Sunderland City Council have undertaken an equality impact assessment on this document.

**Accommodation – None.**

**Crime and Disorder – None.**

**Human Rights – None.**

**Consultation** – This document is being consulted upon in accordance with Sunderland City Council's Statement of Community Involvement. Durham County Council has been consulted upon as an adjoining local planning authority and will need to submit comments by 2 October 2017.

**Procurement – None.**

**Disability Discrimination Act – None.**

**Legal Implications – None.**

## Appendix 2: Draft Response to Sunderland City Council Core Strategy and Development Plan 2017 – 2033 Draft Plan

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Planning Policy Section  
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4 October 2017

Dear Mr Fairlamb,

### **Duty to Co-operate – Sunderland City Council Core Strategy and Development Plan 2017 – 2033 Draft Plan**

Durham County Council welcomes the opportunity to comment on Sunderland City Council's Core Strategy and Development Plan (CSDP) consultation document. This response reflects discussions between the two authorities held as part of the Duty to Cooperate on the 17<sup>th</sup> of August and the 7<sup>th</sup> September 2017.

In setting out comments below, Durham County Council would welcome further discussions on the issues raised as our evidence base develops and prior to the next stage of policy development.

#### Objectively Assessed Need for Housing

Further understanding is required on the assumptions made as part of Objectively Assessed Need for Housing (OAN) in Sunderland, what implications these have for County Durham and how they relate to the assumptions made within the scenarios modelled as part of the Issues and Options Stage County Durham Plan.

It is noted that the CSDP seems to provide a different narrative to the assumptions modelled in the Sunderland's evidence base and clarity is sought from Sunderland on the commuting and migration assumptions incorporated as part of OAN and underpinning the policy approach.

Firstly, in respect of commuting, paragraph 5.26 of the CSDP it is noted:

*The assessment concludes that, if Sunderland is to meet the OAN and sustain the city's population, support the future jobs growth and **reduce the amount of in-commuting** to the city, the Plan should make provision for 13,824 net additional dwellings over the Plan period. [Emphasis added].*

The 'assessment' is taken to be the Strategic Housing Market Assessment (SHMA) and the Edge analytics modelling work. It is however understood that for the purposes of the modelling, the commuting ratio is fixed at the 2011 Census Rate for the preferred option scenario for OAN in the CSDP<sup>3</sup>

Secondly, with regard to migration, it is noted that the CSDP provides a 'Strategic Challenge 1' to '*address outward migration of working age population and plan to meet the needs of a growing and ageing population*' (page 19). At paragraph 5.30 the CSDP notes:

*The council has considered if neighbouring authorities could accommodate Sunderland's housing shortfall. However, this option is not appropriate as a **strategic priority of this Plan is to reverse the trend of outward migration to surrounding authorities and retain our working age population.** [Emphasis added].*

However, the evidence presented alongside the CSDP doesn't model a change to the specific migration relationship between Sunderland and the surrounding authorities. In the preferred scenario for OAN the source of the in migration is unspecified. It is noted that SHMA is specific in setting out that that this has not been undertaken '*Alternative scenarios which consider a potential reduction in net out migration have also been considered but these are considered to be 'policy on' scenarios and therefore not part of the OAN calculation*' (SHMA para 6.14 iii.)

### Housing Allocations

With regard to the South Sunderland Growth Area (SSGA), it is noted that this development has the potential to generate substantial trips across the boundary into County Durham and onto the strategic and local highway network. The Sunderland Highway Improvement Model (SHIM) and 2014 Jacobs report states that traffic growth across the boundary into County Durham is expected to increase by 4.6%. This modelling notes that two local roads in County Durham will be over capacity in 2032 as a direct result of the SSGA, specifically Seaton Lane / Lord Byron's Walk and the A19/A1018/B1404 Seaton Intersection. Durham County Council requires further information on how the impact of the SSGA on the road network will be mitigated.

The Ryhope-Doxford Link Road is listed as being critical to supporting the SSGA. This road is planned to run along the southern boundary of the built up area of Tunstall and Ryhope linking through to the A19. Durham County Council would welcome further discussions with Sunderland City Council and Highways England to assess the impact of this road on the A690/A19 junction.

The two proposed allocations at the Southern Area Playing Fields and Rickleton and the Land at James Steel Park, Fatfield site are adjacent to the Lambton Castle Park in County Durham and the related Garden of Special Historic Interest and Lambton

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<sup>3</sup> Edge Analytics: Sunderland Updating the Demographic Evidence (2016) Table 10 SENS A

Estate Park and Garden of Local Interest. It is considered important to consider the impact of these sites in relation to these nationally and locally important designations. This should include an assessment of how these proposed housing sites affect the setting of the designated site and how any adverse impacts can be satisfactorily mitigated. The park boundary is also a notable feature which would need to remain legible and accessible for maintenance.

### Transport

As outlined above further discussions are required upon a number of matters. In addition, the proposed safeguarding of the Leamside Line is welcomed as reinstatement of this line in the long term could provide additional rail capacity in the North East, supplementing that available on the East Coast Main Line.

### Heritage Coast

The Heritage Coast extends from Saltfern Rocks in Sunderland Southwards into County Durham. You will be aware that the National Planning Policy Framework advises that local planning authorities should seek to maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast. In this context, it is considered that the CSDP would benefit from the inclusion of a specific policy on the Heritage Coast. This would assist in ensuring that there are no direct or indirect unacceptable adverse impacts upon the Heritage Coast in County Durham.

Furthermore, it is noted that the Culture, Leisure and Tourism Policy specifically mentions the aspiration of the City Council to support leisure and tourism proposals at the coast, however there is no consideration within this policy as to how this will be balanced with the protection of the Heritage Coast and environmentally sensitive sites.

In addition, it is noted that there is no specific mention of the impact of the SSGA on the Heritage Coast. This is considered to be an omission, which should be addressed by Sunderland City Council.

### Minerals and Waste

In relation to minerals, it is considered there is an opportunity to set out quantitative information in the plan in relation to the scale of waste management and aggregates minerals that need to be planned for during the plan period. This will set out Sunderland's contribution to meeting regional needs in line with the Local Aggregate Assessment and Waste Needs Assessment.

Policy WM6 addresses mineral safeguarding areas and minerals and waste infrastructure and is accompanied by a list of exemption criteria for development which would not be considered as sterilising. The Council supports the broad approach of the City Council to mineral safeguarding.

Policy WM7 addresses opencast coal extraction. It is considered important that Mineral Planning Authorities seek to ensure a consistent policy approach to opencast coal across the Durham Coalfield. On this basis it is suggested that policy WM7 should be revised. Currently, criteria (3) of Policy WM7 requires a consideration of 'city wide' benefits, however, to be consistent with paragraph 149 of the National Planning Policy Framework (NPPF) the policy should instead require consideration of 'national' benefits instead. Furthermore, it is also recommended that

criteria (1) of this policy should be reconsidered as 'need' for coal extraction is not a matter which paragraph 149 of the NPPF requires to be considered.

In respect of waste, paragraph 3.83 explains that a future challenge in the next five years is that all three existing landfills in the City are due to close. The CSDP refers to the need for duty cooperate discussions with those areas where capacity would be sought. County Durham would welcome a discussion in this regard.

Policy WM3 of the CSDP seeks to safeguard strategically important waste management sites from loss and from encroaching development. While welcomed in principle, it is noted that this policy appears to only safeguard existing and planned facilities required for the management of Local Authority Collected Waste (LACW). As a matter of principle it is considered that all strategically important facilities for all waste streams should be safeguarded from loss and encroaching development thereby protecting their capacity, ensuring their availability and minimising the pressure for new facilities in Sunderland or in adjoining waste planning authority areas. Paragraph 13.23 refers to the JBT Waste Services Transfer Station as of importance to the management of LACW in the City and paragraph 13.24 suggests that WM3 seeks to protect these facilities where they are strategically important. It should be noted that the JBT site lies in Chester-le-Street, County Durham

We would welcome the opportunity to discuss the issues raised in this response as part of our continuous and ongoing engagement as part of the Duty to Cooperate as the plan and evidence base develops.

I am happy to discuss this matter further.

Regards