

Policy Context

1. Sunderland City Council is consulting on a Draft Core Strategy and Development Plan (CSDP). The plan is the first published draft of Sunderland's emerging Core Strategy, and the current consultation follows consultation carried out in summer 2016 on growth and development options.
2. The draft CSDP identifies several "housing release sites", situated around Springwell Village, and to the North of Washington, proposed within the plan for deletion from the Green Belt, and allocation for residential development. The draft plan considers development of land in the Green Belt is necessary to meet housing needs identified for the City.
3. The Council shares borders with Sunderland City Council and as such development of these sites, and other strategic planning issues set out within the CSDP have potential to affect Gateshead. The current consultation gives the Council the opportunity to provide a formal response on the emerging policies, including proposed site allocations of the Sunderland Local Plan.
4. The scale of housing need identified in the CSDP (at an average of 768 dwellings per year) is considerably higher than the level of housing need indicated by past demographic trends related to Sunderland. The CSDP argues that a higher level of housing growth is required to support jobs growth in the City, and makes clear that a strategic priority of the emerging Local Plan is to reduce the trend of outward migration from Sunderland to its neighbouring local authority areas.
5. Sunderland City Council is yet to reach agreement with its neighbouring areas regarding the potential cross-boundary impacts of its planned housing growth. As such, there is potential that relatively high levels of housing (and population) growth in Sunderland could come at the expense of growth in Gateshead.
6. The proposed allocation of housing sites in land currently within the Green Belt around Springwell Village, and to the north of Washington is likely to encroach on the Green Belt in this area, narrowing the gap between Gateshead and Springwell/Washington.

7. In our response to Sunderland City Council's consultation on proposed development options (approved by Cabinet at their meeting of 12 July 2016), we expressed concern that development in this area had potential to merge settlements. Our response to the current consultation notes that we have previously expressed concern regarding development in this area, and requests that these sites are omitted from further drafts of the emerging Local Plan. Our detailed comments, providing an assessment of the proposed site allocations, are appended to the consultation response.
8. The deadline for consultation responses was 2 October 2017. In order to meet this deadline, our comments have been forwarded to Sunderland City Council for information, with an accompanying covering letter stating that our formal consultation response is subject to Cabinet approval on 17 October 2017.

Implications of Recommended Option

9. **Resources:**
 - a) **Financial Implications** – The Strategic Director, Corporate Resources confirms there are no financial implications directly arise from this report
 - b) **Human Resources Implications** – No human resources implications.
 - c) **Property Implications** - No property implications.
10. **Risk Management Implication** - No risks associated with the consultation.
11. **Equality and Diversity Implications** – No equality and diversity implications
12. **Crime and Disorder Implications** – No crime implications.
13. **Health Implications** – No health implications.
14. **Sustainability Implications** – Draft Sustainability Appraisal and Strategic Environmental Assessments have been prepared for the documents that have been published. Further updates to these assessments will be produced as proposals are developed.
15. **Human Rights Implications** - No human rights implications.
16. **Area and Ward Implications** – The Sunderland Local Plan could potentially have implications for Gateshead, although close cooperation between Councils and adhering to the duty to co-operate should resolve any issues.

Appendix 2

Sunderland City Council Draft Core Strategy and Development Plan

Thank you for providing us with the opportunity to comment on Sunderland City Council's Draft Core Strategy and Development Plan (CSDP). As neighbouring local authorities, cooperation on strategic cross-boundary issues can positively influence sustainable patterns of development in Gateshead and Sunderland. Consultation on Sunderland's CSDP is of relevance to Gateshead as we prepare elements of our Local Plan, and continue to implement the Gateshead and Newcastle Core Strategy and Urban Core Plan (CSUCP).

Housing need

The draft CSDP seeks to establish a minimum housing requirement of 13,824 net additional dwellings over the 2015-2033 plan period, equating to an average of 768 dwellings per annum. The 2017 Sunderland Strategic Housing Market Assessment Update (SHMA) has calculated this level of housing need by identifying a 'baseline' scenario (based on a continuation of observed demographic trends) of 570 dwellings per annum, with upward adjustments applied to reflect projected jobs growth, and the dwelling requirements of employees at the International Advanced Manufacturing Park.

The level of housing provision set out in the CSDP is significantly above the baseline scenario of demographic growth, and it is evident from the SHMA that delivery of 768 dwelling per annum will require a considerable change to the migration flows currently affecting Sunderland. Movements between neighbouring local authority areas is the component of migration that is most readily influenced by local policy interventions, and it therefore seems likely that the increased level of housing provision set out in the CSDP will primarily affect migration between Sunderland and its neighbouring local authority areas.

In this respect, the CSDP identifies reducing out-migration (of working age residents) as one of the key strategic challenges that Sunderland's emerging Local Plan seeks to address. Strategic Priority 1 of the CSDP considers that "supporting the retention of young economically active groups and graduates" is a component of delivering sustainable growth within the city, while paragraph 5.30 goes further, and specifies that: "a strategic priority of the Plan is to reverse the trend of outward migration to surrounding authorities".

Gateshead Council supports the principle of delivering sustainable economic growth in Sunderland, but we are concerned that the CSDP's objective of reducing outward migration to neighbouring areas and may conflict with the emerging and adopted plans of Sunderland's neighbouring local authority areas. In this respect, we note that although the CSDP seeks to reduce outward migration to neighbouring areas, Sunderland City Council has not yet agreed a position with its neighbouring local authority areas regarding the potential cross-boundary implications of this.

Net migration flows between Gateshead and Sunderland are relatively small and as such it would not be appropriate to regard Gateshead as having benefitted from the outward migration of residents from Sunderland. However, the small level of net migration between our two areas masks a significant flow of residents moving each year from Gateshead to Sunderland and vice versa. Analysis of the past five years' migration data from ONS indicates that on average around 600 residents move each year from Gateshead to Sunderland, with around the same number moving from Sunderland to Gateshead. We are concerned that, if successfully implemented, Sunderland's aim of reversing the trend of outward migration to neighbouring areas will have the effect of reducing all out-migration from Sunderland, resulting in an adverse effect on population change in Gateshead. This issue is of relevance for Gateshead Council, as we continue to implement the CSUCP, which was adopted in March 2015. The CSUCP seeks to attract and retain working age residents, and plans to accommodate objectively assessed housing needs in full within the plan area.

As you will be aware, DCLG recently launched a public consultation on proposals to revise some elements of national planning policy. The proposals contained within *Planning for the right homes in the right places: consultation proposals* include a standardised approach for assessing local housing need. The approach utilises the latest published household projections from DCLG, with a proportionate uplift applied to account for the relative affordability of homes within the local authority. The indicative assessment of housing needs based on this approach, published by DCLG as part of the material supporting the consultation, indicates that Sunderland has a need for 593 dwellings per year over the period 2016 to 2026.

It is important to recognise that the proposed standardised method for calculating housing need is subject to ongoing public consultation. Nonetheless the indicative housing need identified for Sunderland suggests that a more modest housing need figure may be appropriate for Sunderland, unless the City Council can reach agreement with its neighbouring authorities on the cross-boundary implications of the CSDP for housing needs in this part of the region. DCLG's consultation also proposes to establish a requirement for local authorities to produce a statement of common ground with neighbouring local authorities that addresses cross-boundary matters, including housing need. This provides increased emphasis on the importance of cross-boundary working when determining housing needs.

We are keen to work with Sunderland City Council to understand the potential cross-boundary implications of Sunderland's housing needs. The housing requirement set out in the draft CSDP is heavily reliant upon reducing past trends of out-migration from Sunderland to its neighbouring areas. We are concerned that the plan has not yet fully considered the cross-boundary implications of this approach within the context of the adopted and emerging Local Plan documents of Sunderland's neighbouring local authority areas. Without formal agreement that the City Council can accommodate a portion of the housing needs of one or more of its neighbouring local authority areas, it seems that a more modest housing requirement (as suggested by the

'baseline' scenario of the Sunderland SHMA, or by the indicative housing needs figure set out in DCLG's recent consultation material) would be appropriate.

A lower housing requirement would appear to reduce the need to consider the potential of sites currently in the Green Belt to accommodate residential development. We therefore question whether Sunderland City Council can adequately demonstrate that exceptional circumstances currently exist to justify the proposed allocation of the housing release sites identified in draft policy SA3, or the associated proposed modifications to the Green Belt boundary.

Strategic Site Allocations

The draft CSDP has identified a number of housing release sites at Springwell Village and to the north of Washington, proposed for deletion from the Green Belt and allocation for housing in draft policy SA3. Detailed comments regarding the proposed allocation of these sites, in terms of the impact on the Green Belt, are appended to this letter.

Gateshead Council's response to consultation on Stage 1 of Sunderland City Council's Green Belt Review (dated 1 July 2016) highlighted our concern that development in the north and/or west of Springwell Village would risk joining the built-up areas of Washington/Springwell with Gateshead, or narrowing the Green Belt in this vicinity to the extent of endangering its integrity. Although draft policy E11 identifies preventing the merging of Sunderland with Tyneside as one of the purposes of the Green Belt within the City, this is not reflected in the evidence base supporting the individual proposed site allocations. In our view the identification of housing release sites around Springwell Village and to the north of Washington has given insufficient weight to the strategic purpose of the Green Belt separating the conurbations.

Notwithstanding our concerns regarding the housing need set out in the CSDP, we request that the emerging plan excludes the proposed housing release sites around Springwell Village and to the north of Washington (sites HRS1, HRS2, HRS3, HRS4, and HRS5), as these sites would have the effect of narrowing the strategic gap provided by the Green Belt in this area. As you will be aware, in November 2011 Sunderland City Council submitted a holding objection to two adjoining potential development sites at Leam Lane, Gateshead, identified in the NewcastleGateshead Draft Core Strategy, on grounds of encroachment into the Green Belt. Gateshead Council subsequently withdrew those sites from consideration.

Environment

Following the formation of the River Don Catchment Partnership in 2016, Gateshead Council is keen to work with key stakeholders to support an integrated catchment management vision for the River Don. The vision of this partnership seeks to: manage flood risk, improve water quality and the river environment, enhance biodiversity and enable development across the River Don catchment. To support this cross-boundary working, it would be beneficial for Sunderland's emerging Local Plan to include a policy that

supports the River Don Vision. The specific policy requirements for any housing allocations at Springwell Village and Usworth should also have regard to the integrated catchment management of the River Don.

Transport

We are pleased to note that Sunderland City Council's broad approach to sustainable travel, set out in draft policy CC1, is compatible with the principles of promoting sustainable transport that are established within policy CS13 of the CSUCP. However, we note that the evidence of transport impacts (provided within Sunderland Local Plan – Initial Assessment of Transport Impacts) prepared to support the CSDP does not at this stage attempt to quantify the collective quantum of development outside of Sunderland. In addition, the presentation of traffic information within the assessment does not provide an opportunity to estimate those impacts. Although we recognise the CSDP's objective of preventing an increase in in-commuting into Sunderland, we also note that in practice commuting patterns are difficult to influence through Local Plan policy.

Accordingly, we require a more detailed understanding of the transport impacts of the CSDP before we are able to reach a conclusion on the potential cross-boundary implications for Gateshead. Gateshead Council would expect any development proposals which are demonstrated to have an impact on Gateshead's transport network to appropriately address or mitigate that impact.

Summary

Cooperation between local planning authorities on strategic cross-boundary issues is integral in preparing a robust and sustainable Local Plan, and we welcome the opportunity to contribute to consultation on the draft CSDP. As noted in our detailed comments above, we are concerned that the scale of housing need set out within the CSDP is reliant upon a significant reduction in out-migration from Sunderland to neighbouring areas, yet agreement has not yet been reached on the cross-boundary impacts of this. In accordance with the duty to cooperate, we are keen to work collaboratively with Sunderland City Council to further understand the cross-boundary implications of housing needs in the City.

Our assessment of the CSDP would also benefit from the preparation and sharing of more detailed information regarding the transport implications of the plan. In addition, a collaborative approach to preparation of policies relating to sites within the River Don catchment would support delivery of the River Don Vision.

With regard to the proposed modifications to the Green Belt in Sunderland, Gateshead Council is concerned that the potential development of sites around Springwell Village, and to the North of Washington will encroach into the Green Belt in this area. Notwithstanding the issues we have with the current assessment of housing needs in Sunderland, we request that proposed housing release sites HRS1, HRS2, HRS3, HRS4 and HRS5 are excluded from Sunderland's emerging Local Plan.

Appendix

Detailed Assessment of Strategic Site Allocations

The CSDP identifies a number of housing release sites, proposed for deletion from the Green Belt and allocated for housing. Of these, Gateshead Council is concerned with those at Springwell Village and on the northern edge of Washington, as these affect the strategic Green Belt gap between the Tyneside and Wearside conurbations. Comments provided here in relation to specific site allocations should be considered in addition to the

The proposed housing allocations in question are:

- HRS1 North of Mount Lane, Springwell Village.
- HRS2 Peareth Hall Farm and Gospel Hall Trust Meeting House, Springwell Village.
- HRS3 Land at Stoney Lane, Springwell Village.
- HRS4 Land at George Washington Hotel Golf Course (Pitch and Putt), Usworth.
- HRS5 Farmland to the west of Waterloo Road, Usworth.

Gateshead Council's response to Sunderland City Council's Green Belt Review Stage 1 consultation indicated our concern that the identification of a number of the sites included in that consultation, in the areas referred to above, did not give sufficient weight to the strategic purpose of the Green Belt in separating the conurbations. This follows from the Growth Options document, which did not identify Green Belt in these areas as essential to its purposes.

In our response to consultation on the Green Belt Review Stage 1, we indicated support for the broad spatial distribution identified by the City's 2013 draft Core Strategy. This spatial distribution referred to the majority of new housing in the Local Authority being located in South Sunderland, with only a minor amount of new housing being developed at Washington, where no extension of the urban area, or loss of Green Belt, was envisaged.

The current proposals for Springwell Village and the area to the north of Washington are relatively minor in terms of the size of the individual sites and in terms of their contribution to the City's total planned housing supply. However, these sites are located so as to significantly damage the functioning of the Green Belt, particularly in regard to its role in separating settlements, both at the local level and viewed strategically in the context of Wearside and Tyneside as conurbations.

All the sites impact on the strategic gap, which may be taken to bifurcate around Springwell Village and pass either side of it (that is, Springwell Village is a settlement within the strategic gap). Sites HRS2, HRS3 and HRS4 taken together join Springwell Village to Washington. Development of these sites would therefore reduce the strategic gap between the conurbations to the relatively narrow area of land between Springwell Village and Eighton Banks. This in turn would be further narrowed by proposed site HRS1.

It is important to note that there is developed land at Eighton Banks which is within the Green Belt but defined by a settlement envelope. Development of site HRS1 would reduce the gap between Springwell Village and the nearest part of the settlement envelope at Eighton Banks to approximately 250 metres. Moreover as there are a number of buildings at low density in the remaining part of this gap at this point, the proposal would completely eliminate the only piece of completely open land separating Springwell Village from Eighton Banks.

Similarly, Site HRS5, on the NE side of Washington, would encroach significantly on the same strategic gap at a location further east.

We note that the consultation draft makes no reference to the strategic Green Belt gap between Tyneside and Wearside in evaluating any of the sites in the Indicative Layout and Capacity Study of Proposed Housing Release Sites, either in the Key Constraints or in the Impact on the Green Belt analysis for each site. Policy E11 of the draft Core Strategy identifies preventing the merging of Sunderland with Tyneside as one of the purposes of the Green Belt within the City, but this is not reflected in the evidence base supporting the individual proposed site allocations.

As you will be aware, in November 2011 Sunderland City Council submitted a holding objection to two adjoining potential development sites at Leam Lane, Gateshead, identified in the NewcastleGateshead Draft Core Strategy, on grounds of encroachment into the Green Belt. Gateshead Council subsequently withdrew those sites from consideration.