

Session 2 13.30 Tuesday 21/05/ 2019 Matter 2 Spatial Strategy and Related Policies J Blundell ID01170267

- 1.1 Is the spatial distribution of development within the Sub-Areas clear from the Plan and justified?
- 1.2 Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?
- 2.1 Is the split between the Existing Urban Area and elsewhere and between brownfield and greenfield land clear from the Plan and justified?

There is no justification to lose the Green field gaps between existing Urban areas and communities. The Framework requires Local Plans to avoid Urban sprawl. There is no justification to allow a merging of Brownfield and Greenfield land. There is no evidence in any of the demographic CLG2016 **5044** houses, volatile employment swings **-21000** to **26000** 2013-2018 or as economic data highest rank order **90.1%** GVA/hr that provides for that justification.

Large areas of existing Green belt as Safeguarded as generally unnecessary excessive aspiration with a Plan that has not clearly defined those areas as distinct and in places proposed as sporadic ad-hoc side by side and incongruous to each other.

2.2 Has the Plan robustly explored the effective use of brownfield land to meet development needs?

Permission consents **7,675 (3,522** 2015-2018 as completions) have negated the NPPF for the “right homes in the right places” aswell as the right quantity. Indicative of the SHLAA potential **11,555** with **59.90%** as non-Brownfield register, while only **4,633 40.10%** of a SHLAA2018 potential as Brownfield register. The Local Plan methodology for affordable housing is limited and self-inflicted.

Table7.1

Hectares	MinNet Dwellings	MinNet density	Urban at 40/ha	Semi Urban at 30/ha	Rural at 20/ha	CLG2016	40/ha % of CLG2016	SHLAA potential	SHLAA% Non Brownfield	SHLAA% as Brownfield
170.29	4,633	27.21	6,812	5,109	3,406	5,044	135.04	11,555	59.90%	40.10%

Affordables at only 10%-15% for low to medium value areas is undersupply of affordables. The Brownfield register as minimum Net density of **27.21/ha**, while at **40/ha** has a potential **6,812** which is not applied, negates most possibility for affordables to be >10%.

That **40% : 59.9%** split between Brownfield, and non-Brownfield is indicative of an ineffective use of Brownfield not least at **27.21/ha** as also ineffective usage when at **40/ha** Brownfield is capable of **6,812** dwellings. Not least a CLG2016 **5,044** demographic housing requirement is capable of being accommodated entirely by Brownfield **6,812** at 40units/ha.

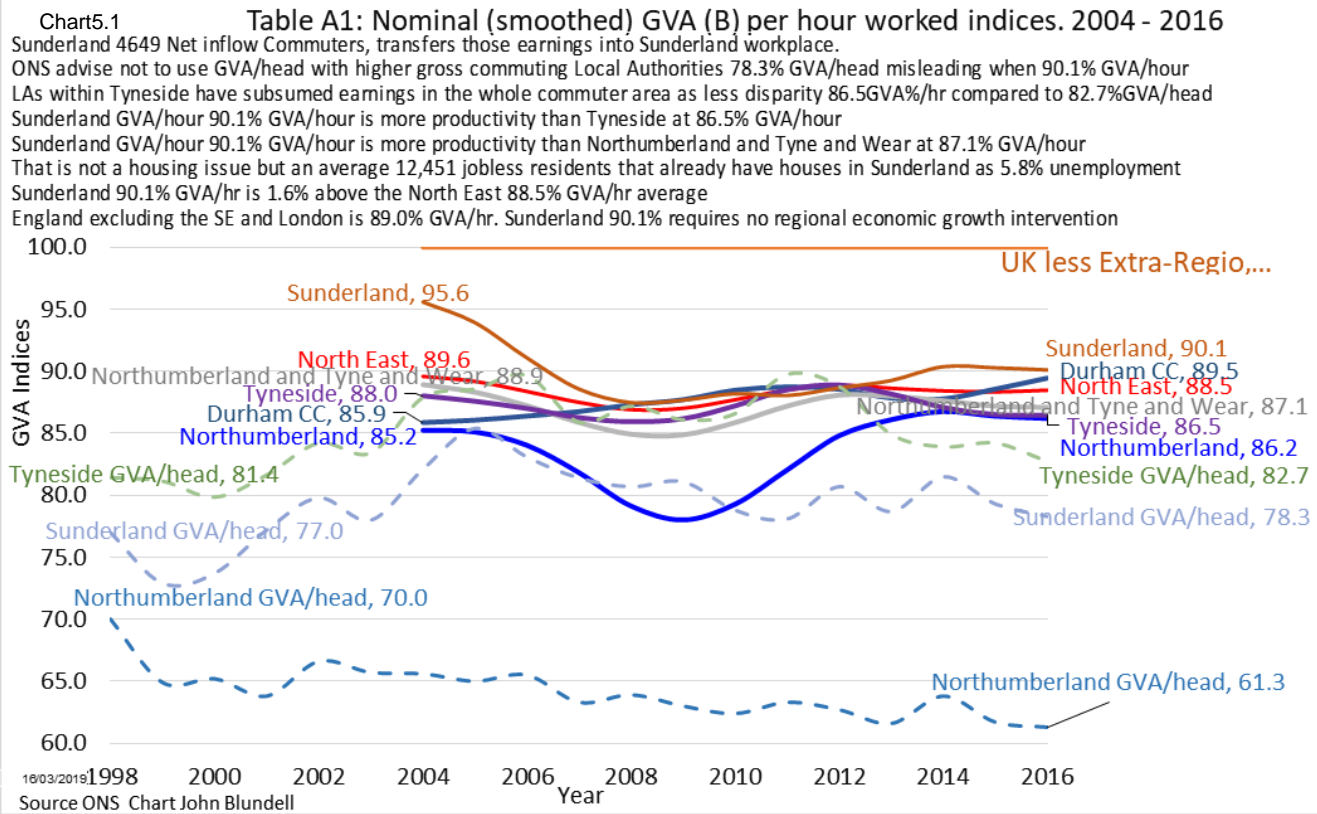
2.3 Are there areas of brownfield land, including land identified as Key Employment Areas, that should be allocated for housing, taking into account employment land requirements and viability and deliverability issues?

There is no reason that brownfield cannot be used for housing other than profit margins restrictions for developers who are averse to developing previously developed land. The employment aspiration is over ambitious as historic volatility **-21,000** to **26,000** 2013-2018 and currently uncertain, while a Brownfield register **6,812** at 40units/ha that could accommodate the whole of CLG2016 **5,044** demographic housing need.

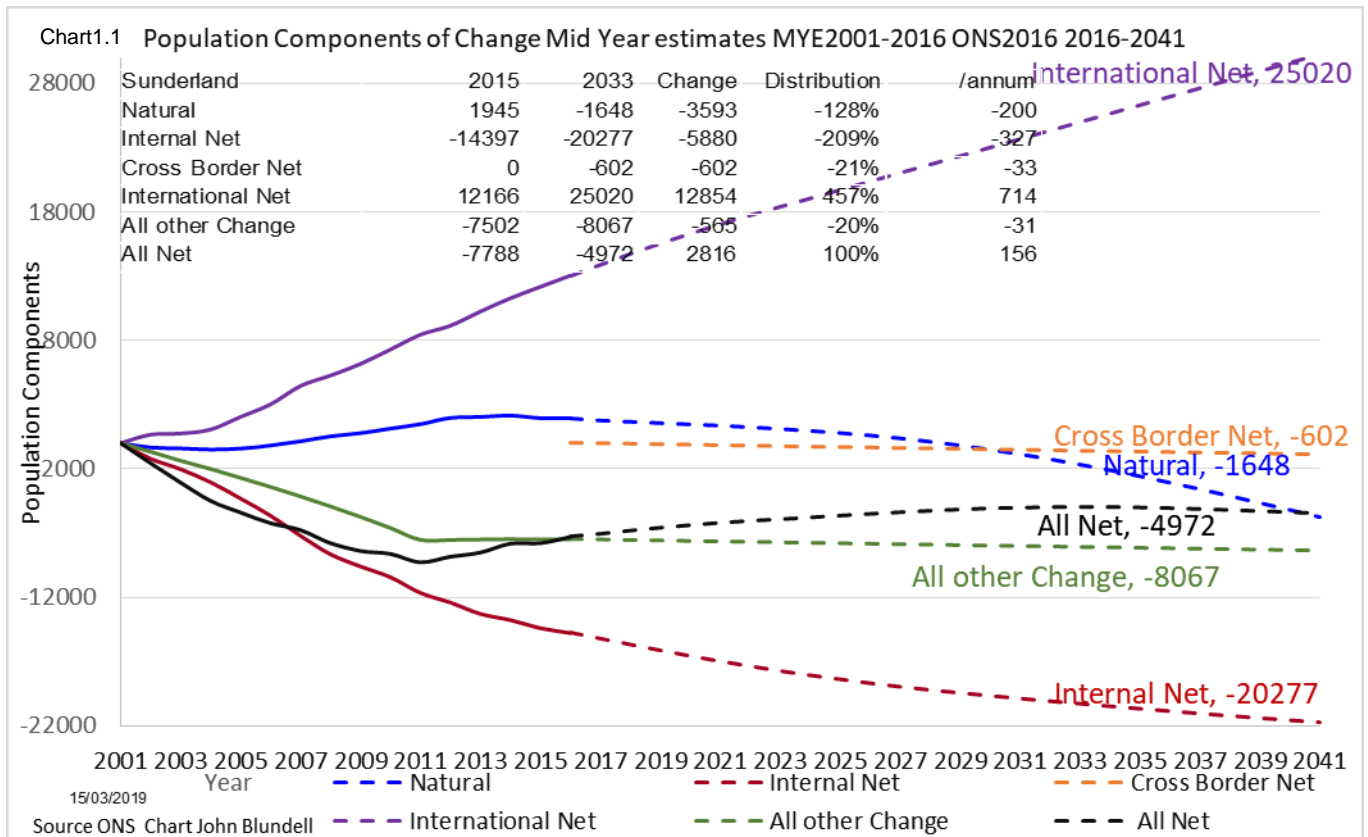
3.1. Has, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

Exceptional circumstances to remove Green belt requires stringent necessity as in High Court assessment of its definition, not least Government ministers state housing alone is not exceptional circumstances. If the exceptional circumstances is defined by economic necessity as increased jobs which requires housing for those workers then there is no evidence of exceptional circumstances. There is no stringent necessity to allow exceptional circumstances because;

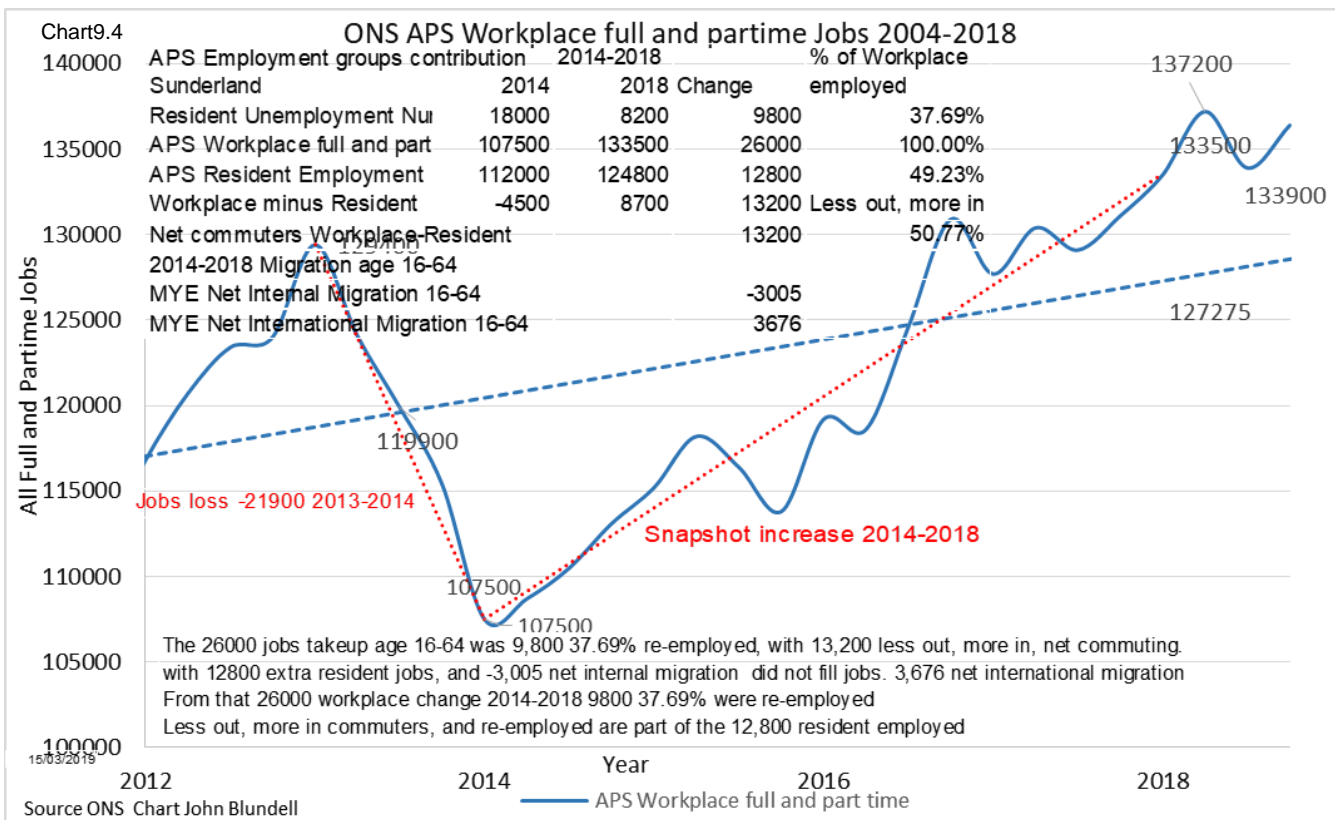
- a.** Brownfield underused. **b.** Highest rank order GVA/hr productivity. **c.** Volatile Employment history. **d.** Underperforming NELEP economic jobs aspiration. **e.** No stress in the market with Flat lining House prices. **f.** Over ambitious housing aspiration does not constitute exceptional circumstances.
- a.** For exceptional circumstances to exist there needs be evidence that all Brownfield Sites have been considered, and efficiently used first. There is no stringent necessity for exceptional circumstances if the Brownfield register using urban densities of 40units/hectare can deliver **6,812** houses. A Brownfield register capable of fulfilling the CLG2016 total demographic need requirement **5,044** with a potential **6,812** housing at urban 40/ha was not used efficiently or fully.
- b.** There is no GVA productivity exceptional circumstances as Sunderland has the highest rank order **90.1%**GVA/hr within the NE12 LAs **Chart 5.1** a d exceeds the rest of England demographic housing requirement at **89.0%**GVA/hr (excluding the SE and London). There is no economic stringent necessity or justification for policy intervention based on economic productivity.



c. There is no jobs required by imported workers as historically most jobs when created are filled by residents, and more in-less out commuting all with houses already, and as already allocated within the ONS Components of Change as **12,854** International net 2015-2033 as they become residents a year later. ONS trending rate 2011-2016 included a volatile **-21,000** jobs losses and **26,000** job gains.



The Local plan predicates over ambitious polices on the NELEP Strategic Economic Plan SEP. Aswell as further evidence in **Charts9.4,5,6** that jobs are mostly filled by residents and commuters already with houses, there is NELEP Strategic Economic Plan SEP underperformance compared to England nationally in not creating jobs **Charts 9.5**. There is no justification on the reliance of the NELEP SEP to deliver jobs. Indeed an employment peak plateau that is about to become a repeated trough as a post Brexit impact 2019. However the SunderlandCC Local Plan then



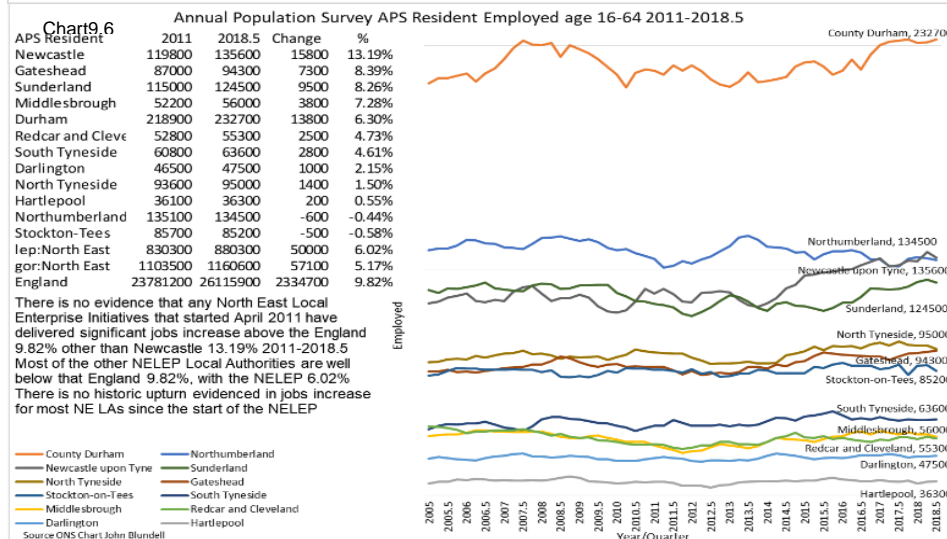
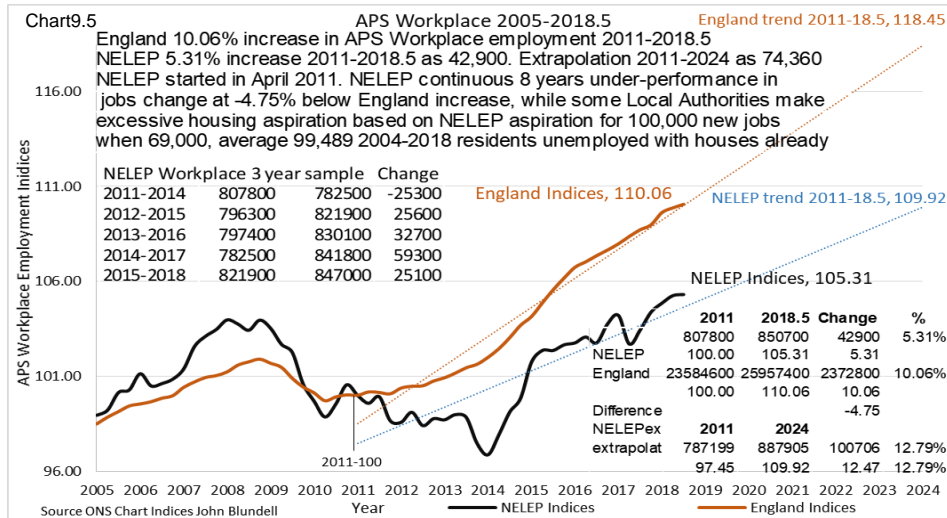
inappropriately attempts to validate the excessive aspiration. There is no further SunderlandCC policy intervention that has not already had ONS2016 trending rates 2011-2016 applied to 2015-2033 for allocation of housing inclusive of those volatile employment swings. The **13,410** housing **10,337** jobs aspiration using NELEP SEP aspiration to cite the stringent necessity for exceptional circumstances to delete Green belt has no credible evidence to support that position. **Chart 9.5, 6 below.** Sunderland out-commuting to other regions increased by **-14,900 -143.27%** 2013-2014, as volatile employment swings large jobs losses trough **-21,900** Chart 9,4 as commuters travel out of the region further for work, already with houses. **Tables 5.1, 2, 3, 4**

Commuters APS Workplace minus Resident. positive less out-more in	2013	2014	Change	%	2014	2018	Change	%
APS Sep2018 Tables 5.1.2								
Sunderland	10400	-4500	-14900	-143.27%	-4500	8700	13200	-293.33%
lep:North East	-27700	-37700	-10000	36.10%	-37700	-32700	5000	-13.26%
qor:North East	-31400	-46100	-14700	46.82%	-46100	-45100	1000	-2.17%
England	-252000	-276100	-24100	9.56%	-276100	-181100	95000	-34.41%
APS Sep2018 Tables 5.3.4								
Sunderland	10400	8700	-1700	-16.35%	1200	12200	11000	916.67%
lep:North East	-27700	-32700	-5000	18.05%	-21500	-31300	-9800	45.58%
qor:North East	-31400	-45100	-13700	43.63%	-24900	-37300	-12400	49.80%
England	-252000	-181100	70900	-28.13%	-180900	-150200	30700	-16.97%

Similarly when there are jobs gains as more in-commuters, also already with houses. That is also a North East commuting exodus as **-12,400 49.80%** outflow to other regions 2011.75-2018.75 at a time when the NELEP SEP was supposedly creating job, and persistent historic under-performance job creation all within the NELEP SEP failed jobs creation scheme for most LAs **Tables 5, 1, 2, 3, 4** and **Chart 9.5, 6 below.** Any job gains and losses are already absorbed by commuting, and already with houses as no exceptional circumstance to delete Green belt.

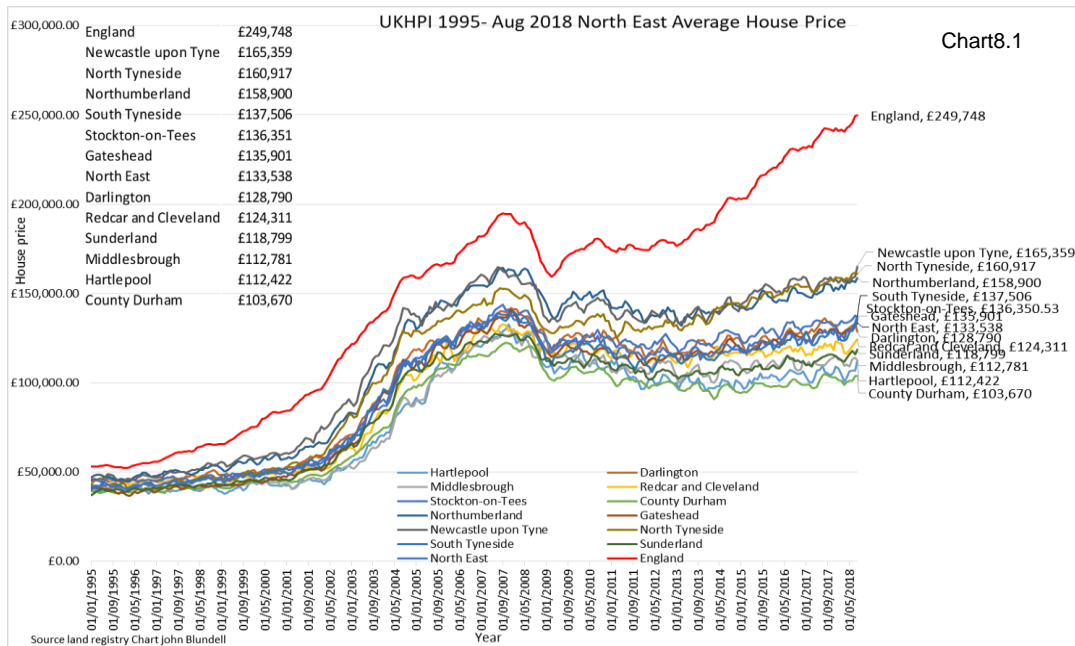
d. An England average jobs increase **9.82%**, while a NELEP **6.02%** confirms there is no credibility in the Sunderland Local Plan over ambitious housing aspiration based on unstable jobs delivery **Charts 9.5, 6** and **Table 5.1, 2** NE Local Enterprise Partnership Jobs delivery was **-4.75%** below the England average. Although the NELEP North East Strategic Economic Plan claims 100,000 new jobs 2014-2024, it only uses a snapshot 2014-2017 sample and ignores the significant jobs losses 2011-2014 for 3 years after the NELEP started April 2011. Selective 3 year snapshot sampling is always an issue that compromises statistics. Even if it is 100,000 by 2024 it is underperforming compared to the rest of the country. NE12LA Workplace **59,300** new jobs 2014-2017 (3 year samples), while less than half of that **25,100** 2015-2018. While England new Workplace jobs delivery is **10.06%** **Chart 9.5 Table**, the NELEP is **5.31%** as underperforming jobs delivery. NELEP

statistical extrapolation cannot simply cherry pick data. **Chart 9.5** Table The NELEP North East Strategic Economic Plan aspiration for 100,000 jobs by 2024 is actually underperforming with the bench mark of the England APS employment, both as APS Workplace employment **-4.75%** less and APS Resident employment (England **9.82%**-NELEP **6.02%**) **-3.80%** less than the England employment change. **Chart 9.6** Table



There is no NELEP Strategic economic Plan exceptional circumstances for SunderlandCC as the NELEP is significantly underperforming compared to the rest of the England jobs performance. There is no evidence that any North East Local Enterprise Initiatives that started in April 2011, have delivered significant residents jobs increase above the England **9.82%** other than Newcastle **13.19%** APS Resident employed 2011-2018. Compared to an England jobs increase of **9.82%** 2011-2018, most of the other North East Local Authorities are below that England average, below the NELEP 7LAs **6.02%** and below the North East 12LAs **5.17%** increase. **Chart 9.5 (session1), 9.6**. In all aspects of the stringent economic necessity to delete Green belt there is no evidence to support exceptional circumstances, particularly if a Brownfield register used its potential **6,812** at 40 unit/ha **Chart 9.5, 6**. All compounded by an imminent Brexit that in whatever outcome is as at least 10 years of impacted trade, and a reduced Sunderland specific international migration and workforce. **e**. There is no housing stress in the Sunderland housing market that indicates a supply issue as Sunderland house prices have generally flat lined 2004-2018 and for the whole of the North East NE12LAs housing market, indicated by no sharp house price. Workforce retention is a jobs availability issue, not housing, with large volatile historic swings **Chart 9.1.2.3.4** Sunderland as well as adjacent LAs in the North East has no market stress in house prices within each housing type as virtually the same as North East prices. Not only **Chart 8.1** as evidence of no supply issues as flat lining, especially Sunderland as decreasing 2008-2018, but also Government Sep 2017 Affordability ratios for Sunderland **4.773:1** that are just above the Standard Method non-intervention level of **4:1** (Workplace median house prices to earnings ratio published April 2018). The 2017 affordability ratio for Sunderland is at **4.773** and relatively close to the benchmark MHCLG

Affordability Standard Method **4:1** requiring no intervention at all compared to the rest of the UK at **12 to 30:1**. That is further evidenced by the North East **2017** Affordability ratio also at almost non-intervention level at **5.211** **Chart8.1**



f. Over ambitious **13,410** houses aspiration does not constitute exceptional circumstances as **165.86%** 2015-2033 or as **208.87%** 2019-2039 more than CLG2016 demographic need.

3.2 Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities? The Joint Core Strategy for Gateshead and Newcastle specifically avoided urban sprawl North of Springwell Village, while a SunderlandCC Plan that intends that large scale green belt deletion.

4.1 Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs? Longer term development needs requires robust assessment and stringent necessity justification to allow exceptional circumstances. That should also apply to Green belt as Safeguarded. There is no evidence to support over ambitious housing and jobs aspiration when there is no economic necessity with a Sunderland **90.1%GVA/hr** as highest rank order already of all NE12LAs, large volatile swings in employment **-21,000 to 26,000** 2013-2018 as unpredictable, and an underperforming NELEP SEP that is underperforming **6.02%** jobs increase compared to **9.82%** for England2011-2018 **Chart9.6** above

4.2 Has enough land been proposed for safeguarding to meet longer-term development needs? Long-term development needs requires robust and sound evidence. All demographic **5,044** house required, economic volatile jobs **-21,000 to 26,000**, and highest rank order productivity **90.1%GVA/hr**, and flat lining house prices as no market stress evidence, suggests no necessity for safeguarding large sections of Green belt. Not least an underused Brownfield register, an imminent Brexit recession, and an APS Workplace jobs that has peaked ready for a repeated cyclic trough.

4.3 In general terms is the safeguarded land in the right place to meet longer-term development needs? Sporadic positioning for any Safeguarded land needs to also consider the community that has to live next to it, often areas that also have significant visual amenity and social, and environmental value. Any sustainable planning need to consider the mutual priority of social and environmental with what has become predominantly economic. It is preferable to direct development next to existing similar development and proportionate to future reasonable indication, not over ambitious.

5.1 Does the evidence base and, in particular SD.48, support the principle and general extent of the settlement breaks? The proposals are indirect conflict with the aspirations set out in the joint Core Strategy for Gateshead and Newcastle to avoid Urban Sprawl on their boundary. Settlement break of any "Green Gap" needs to be meaningful in realistically maintaining separation between urban areas. Maintaining the distinction between country side and built up areas can also considered as encroachment by stealth if the Green Gap is superficial.

5.2 Are the provisions of Policy NE7 justified and consistent with national policy or are they too restrictive?

It is a requirement in the Framework to direct as much development within the urban areas. NPPF also promotes Urban regeneration of PDL, which will not happen if there is unnecessary use of Greenfield/belt. Policy NE7 endorses that NPPF requirement, as well as realistic Local plan aspiration would not need to cause merging of settlements, however all contrary with the rest of an over ambitious plan with contrary policies that seeks to delete Greenfield/belt as excessive to realistic requirement.

6.1 Is Policy NE8 consistent with paragraphs 17 and 109 of the Framework?

Policy NE8 as with Policy NE7 endorses the same NPPF requirement to have restrictive policies to protect the Green Belt, as well as Green field Country side. NPPF ideals that need to be maintained, however other Local plan policies seek to delete Green Belt for over ambitious unjustified excessive **13,410** housing and unsound extrapolation based on volatile employment swings to justify **10,337** jobs all of which is intended to delete the very countryside that NE7, NE8 seek to protect.

6.2 Is the Plan clear as to areas of 'valued landscape' and are these areas justified?

Green belt is valued landscape. Public social amenity, and visual amenity areas are valued landscape, not least the vernacular and character of villages is of valued landscape. A Local plan that seeks to have **13,410** extra housing as **208.87%** more housing than the demographic need CLG2016 will devalue that landscape unnecessarily. Once gone, gone for ever leaving communities void of that value. Sustainability is not just economic, but social and environmental.(NPPF). Any excessive aspiration is unsustainable development if the social and environmental aspects ignored.

6.3 Should Policy NE8 allow for development sustainably located on the edge of settlements, particularly where there is a lack of a 5 year housing land supply?

A 5 year housing supply is defined by the OAN. If that OAN is set at **13,410** as excessive, it then could create the undersupply that could have been resolved if CLG2016 at **5044** 2015-2033 + affordability and/or other additions had been used.

20. Permission consents for **7,675** to date that have pre-empted the Local Plan contrary to a MHCLG NPPF aspiration for "the right homes in the right place", and already outpaces CLG2016 Housing **5,044** as "fait accompli". There is no ability for undersupply at that rate of completions. Permission consents **7,675**, and expected projected Completions **9,011** 2015-2033 to pre-empt a Local Plan Preferred option **13,410** as "fait accompli", not least **165.86%** more than CLG2016 Housing projections at **5,044** houses.(DCLG2014 **9,963**). The deliverability concern of the Government Planning Practice Guidance March2018 advice to "Cap" excessive requirement although intended only for excessive Standard method outcomes, has Sunderland CLG2016 **5,044** demographic housing need x 40% as **7,062** as still below the Preferred option **13,410**. That is **13,410-7,062 6,348** houses 2015-2033 more than a **2018NPPF** deliverable sustainability 40% "Cap". That also causes unnecessary Green field/Belt deletion. Intended for the Standard Method, that indicative undeliverable and even excessive to a 40% Cap, the SunderlandCC aspiration needs to be reduced. Not least at **165.86%** more as excessive to the average all approved plans 2010-2016 as average **20%** more than demographic need.

21. A completions trending average **501/annum** that as "fait accompli", outpaces the demographic need **5,044 280/annum** requirement, nor required, as an excessive Local Plan for unnecessary housing by a Preferred option **13,410** at **745/annum**. The Preferred option **13,410** is **4,399** more than the expected **9,011** completions **501/annum** 2015-2033 and would require residual, and windfall completions to achieve delivery as well as reliant on a volatile large surge 2012-2018 **Chart6.1** If there were to be a lack of a 5 year housing land supply predicated on an excessive conjecture **13,410** then the SHLAA with potential **11,555**, and completions stated as **2,479** as well as projected completions **9,011** 2015-2033 achieves that excessive goal. However if a reasonable alternative as well as presented as a reasonable alternative within a realistic Public consultation may have decided for CLG2016 **5,044 houses** demographic need +additions for affordability and local adjustments. In which case **11,555** potential, and **2,479** completions and **9,011** projected have oversubscribed any 5 year land supply issue certainly if the Preferred option had used CLG2016 **5044+20%** (average approved plan addition to demographic need.) 2015-2033