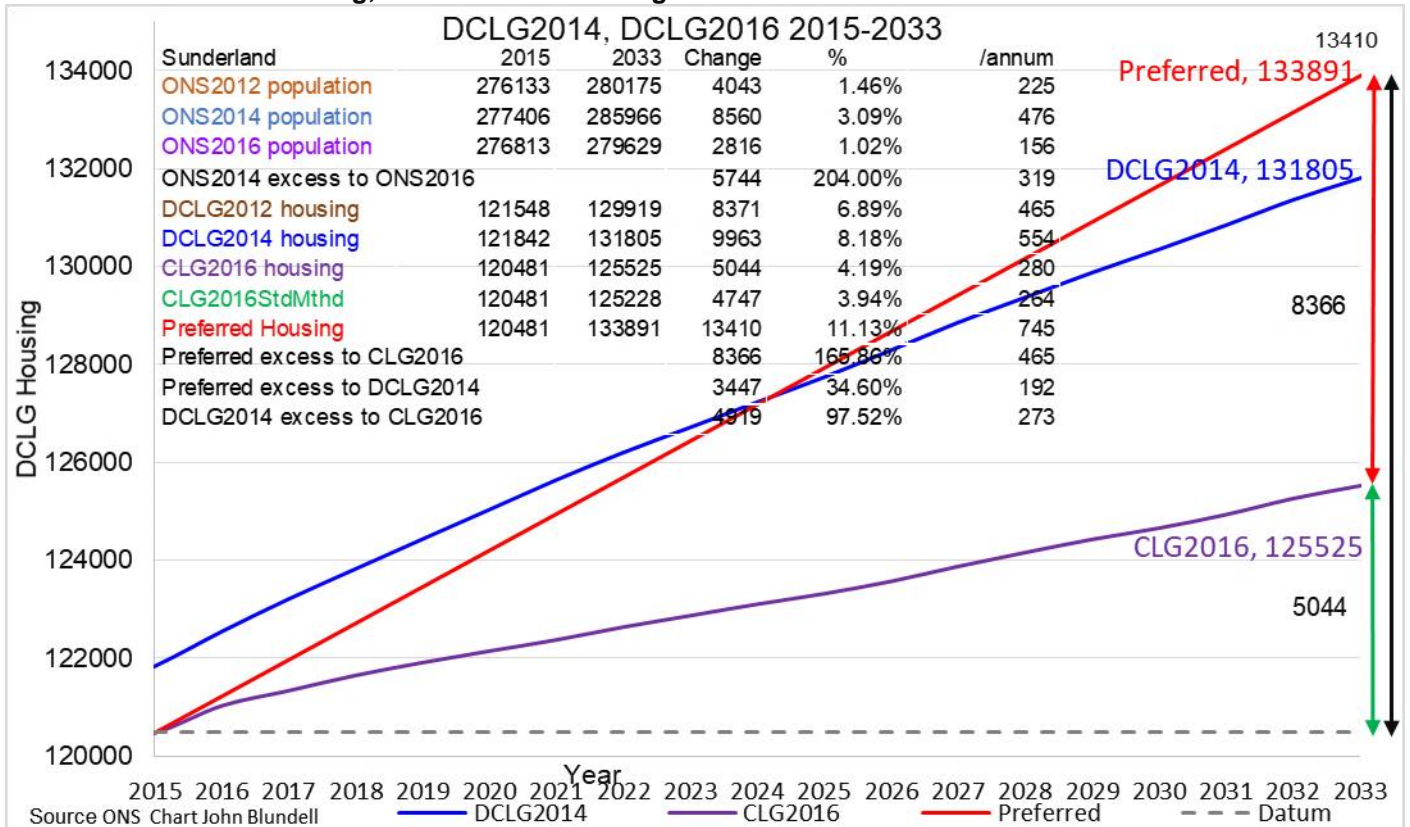


1. The Housing OAN and Requirement

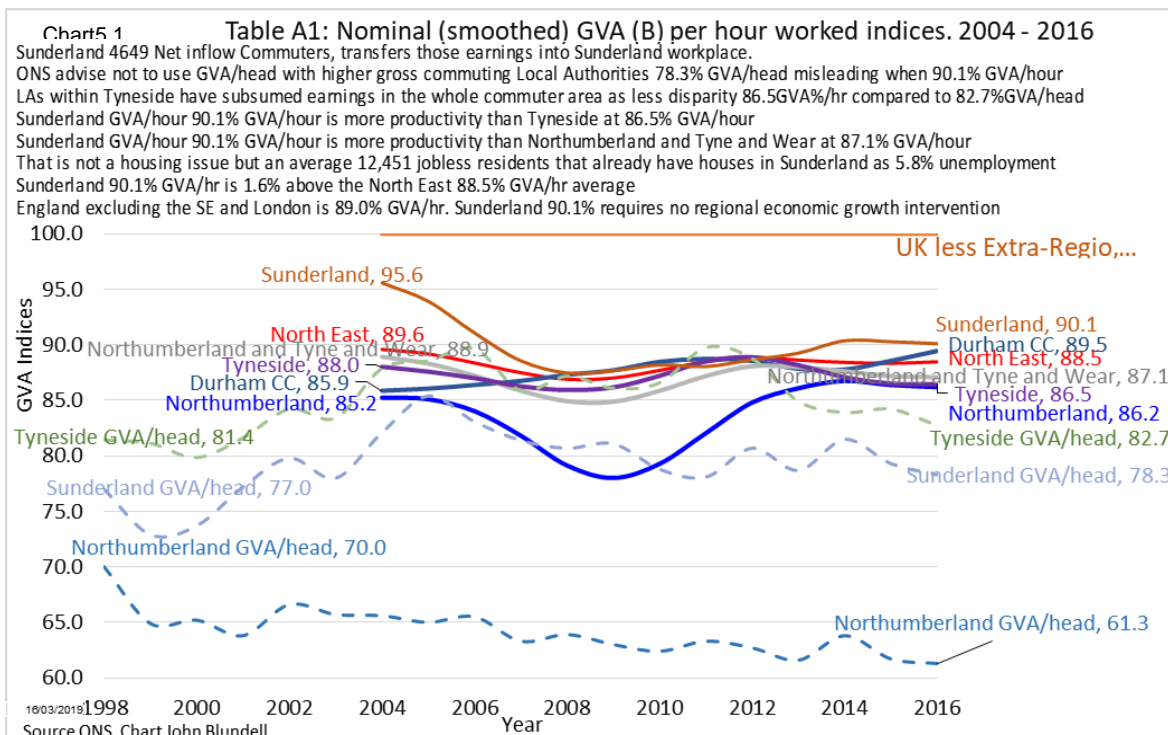
1.1. Does the evidence base support the requirement for housing of 745 dwellings per annum (dpa) or 13,410 dwellings for the LP period taking into account demographic and economic factors, market signals and affordable housing need?

3. A CLG2016 demographic need 5,044 280dpa houses is no robust demographic or economic evidence to justify 13,410 745dpa as an excessive 8,366 165.86% more, when approved plans 2010-2016 were average 20% more than for demographic need.

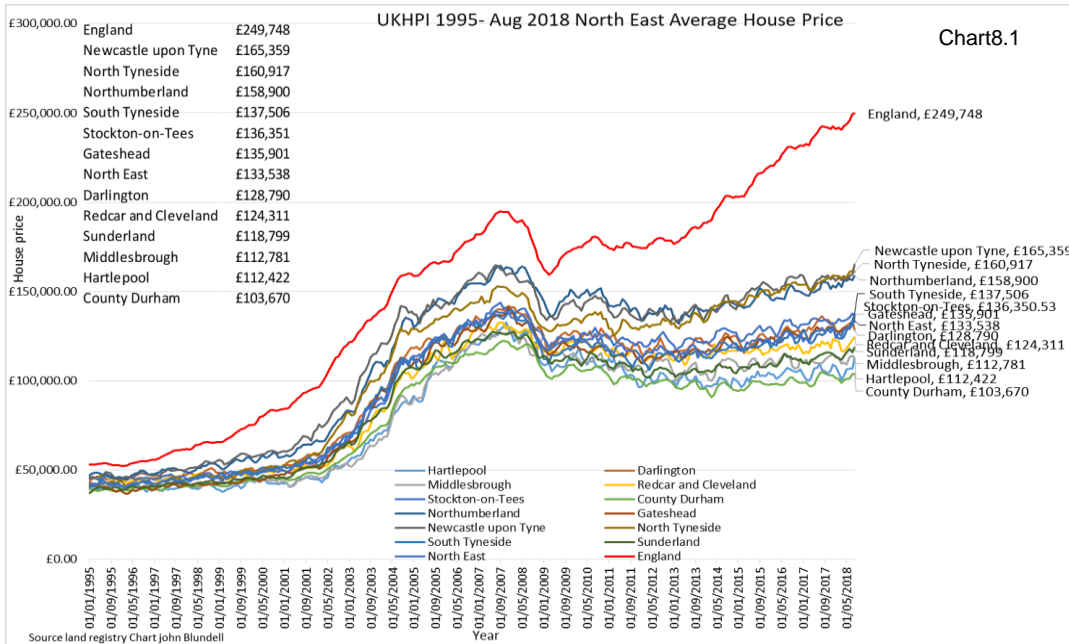
Chart2.1 DCLG2014 Housing, and CLG2016 Housing.



a. Sunderland GVA is highest Rank order at 90.1%GVA/hr productivity in the North East 12 Local Authorities. GVA/hour average 89.7% 2012-2016 compared to any other North East LAs 88.5%GVA/hr. England excluding the SE and London is 89.0% GVA/hr. Sunderland 90.1%GVA/hour requires no regional economic growth intervention, nor as any requirement to cite exceptional circumstances to delete Green belt. Chart5.1



**b. Flat lining houseprices indicate no requirement for interventon polices. Chart8.1**



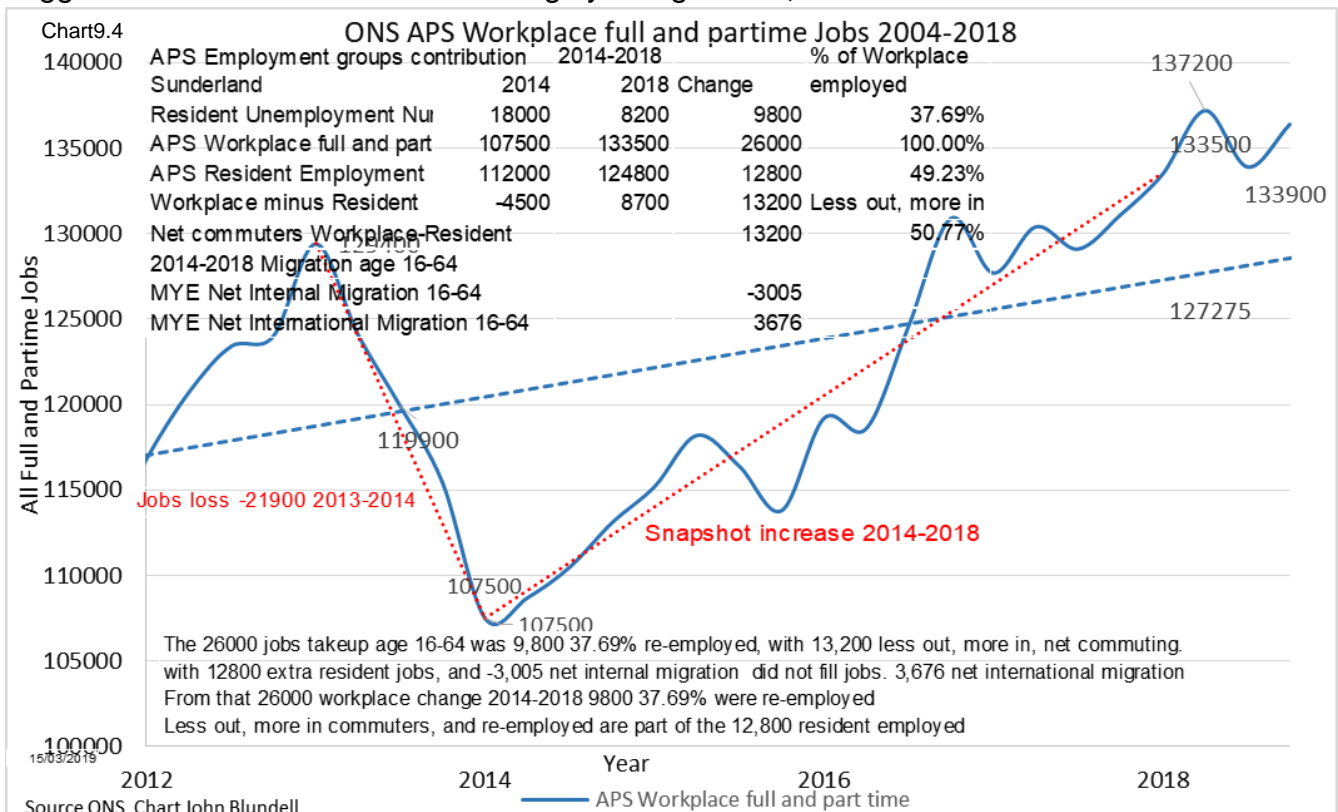
**c. The Government ONS Sunderland Affordability ratio is 4.773 with update released march2019 latest data as 4.847:1 as not requiring any affordability intervention especially with most of Southern England at 12:1 to 40:1.**

**d. The volatile swings in employment -21,900 to 26,000 2013-2018 cannot reliably extrapolate justifiable assessment 2015-2033, with future indication as another imminent downward cycle.**

**e. Jobs are filled by residents and commuters with house already, with no justification to use that for over ambitious 13,410 houses for imported workers. It is flawed Plan policy to have aspiration to import workers when there is 7,700 unemployed, an average 12,451 unemployed 2008-2018 with the same skill sets and already with houses as those to be imported for those extra houses 13410-5044 8,366 165.86% extra.**

**f. The indication is that future expectation is in all scenarios a Brexit impact economic downturn.**

**g. Sunderland has already seen current withdrawal of invesment, and current APS employment suggests a start on its downward swing cycle again -21,900 2013-2014 Chart9.4.**



h. There is no stringent economic necessity to allow exceptional circumstances to delete Green Belt.

1.2 Is the approach to calculating the OAN and housing requirement reasonably consistent with other local planning authorities (LPAs) in the region?

There is a failing of the Duty to Cooperate with Sunderland contributing an excessive **208.87%** more than for demographic need to exacerbate the full NE12LAs Housing Market Area **159,887** as **121.53%** more than CLG2016 **72,173 houses** 2019-2039

The full NE12Las HMA Preferred options excessive disparity with CLG2016 demographic, and Standard method.

NE12LAs 2019-2039	Preferred	CLG2016	Disparity	%	StdMthd	Disparity	%
Darlington	11380	1966	9414	478.84%	2272	9108	400.78%
Durham	26160	17765	8395	47.26%	19904	6256	31.43%
Hartlepool	5740	2068	3672	177.56%	2156	3584	166.24%
Middlesbrough	8444	1824	6620	362.96%	1363	7081	519.57%
Northumberland	17700	7207	10493	145.59%	10874	6826	62.78%
Redcar and Cleveland	4680	1793	2887	161.02%	2282	2398	105.04%
Stockton-on-Tees	12290	6722	5568	82.83%	7805	4485	57.46%
Gateshead	11000	5612	5388	96.01%	5710	5290	92.65%
Newcastle upon Tyne	19000	10749	8251	76.76%	11185	7815	69.87%
North Tyneside	16593	7910	8683	109.77%	9664	6929	71.70%
South Tyneside	12000	3733	8267	221.46%	4190	7810	186.39%
Sunderland	14900	4824	10076	<b>208.87%</b>	5275	9625	<b>182.47%</b>
Full NE12LA HMA	159887	72173	87714	<b>121.53%</b>	82680	77207	<b>93.38%</b>
Sunderland & Tees	57434	19197	38237	199.18%	21154	36280	171.50%

For comparison 2019-2039 used. Sunderland 13,410 2015-2033 is pro-rata 14,900 2019-2039

Most other LAs also have excessive aspiration well beyond CLG2016 demographic need and also excessive to the Standard method.

Sunderland in particular is excessive even to the other excessive LAs Preferred options at **208.87%** more than for demographic need and **182.47%** more than the Standard method

Even using DCLG2014, SunderlandCC Preferred option **14,900** 2019-2039 is **54.36%** more than demographic need and **30.64%** more than the Standard method.

CLG2016	Preferred	CLG2016	Preferred		Standard	Preferred	
NE12LAs	Option	Demographic	Disparity	%	Method	Disparity	%
2019-2029	79944	38191	41753	109.33%	41340	38604	93.38%
2029-2039	79944	33982	45962	135.25%	41340	38604	93.38%
2019-2039	<b>159887</b>	<b>72173</b>	87714	<b>121.53%</b>	82680	77207	93.38%
Sunderland							
2019-2029	7450	2516	4934	196.10%	2637	4813	182.47%
2029-2039	7450	2308	5142	222.79%	2637	4813	182.47%
2019-2039	<b>14900</b>	<b>4824</b>	10076	<b>208.87%</b>	5275	9625	182.47%

For comparison Plan period 2019-2039 used.

The Standard method defines the excess, although not a pre-transition requirement with the NE12LAs **159,887** as **93.38%** more than the **82,680** Standard method, and Sunderland **14,900** as **182.47%** more than the **5,275** CLG2016 Standard method. 2019-2039.

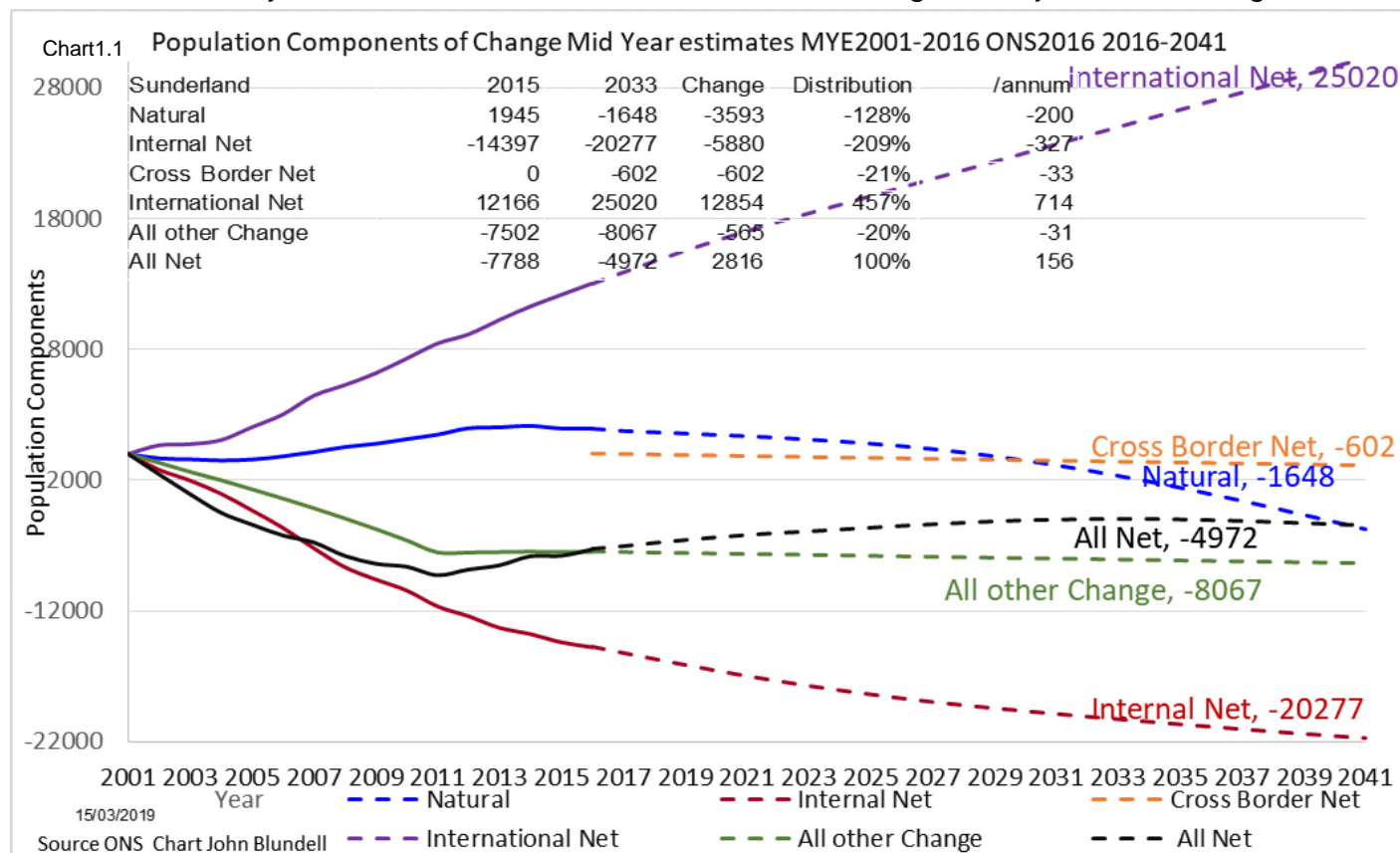
There is nothing consistent or reasonable about the Preferred options housing aspiration for the North East 12LAs or in particular SunderlandCC compared to demographic need or the Standard method as benchmarks. In comparison to Planning Inspectorate averaged approved plans 2011-2017 as 20%, the excessive aspiration of most of the NE12LAs as **121.53%** more is also not consistent.

1.3 Should the housing requirement be higher: a. To support job growth, including that at the International Advanced Manufacturing Park (IAMP) and/or b. To support an uplift in Household Representative Rates for 25 to 44 age range and to help address the affordable housing imbalance?

Any increased housing is already accounted for in the Components of change.

The historical evidence 2011-2018 is that new jobs are filled by residents, and commuters, with very few as internal or international migration. All with houses already.

Similarly job losses as increased unemployment, and more out-less in commuting. All with houses already. ONS2016 already account for **-5,880** internal, and **12,854** international migration that become residents the year after, throughout 2015-2033 in their population Components of change using trending for the previous 5 years 2011-2016 inclusive of volatile employment swings. Unless that trending is affected by significant economic or political events then that housing for future residents is already accounted for, not least inclusive of those significant job losses and gains.



Aspiration for **13,410** houses **10,337** jobs, has no indication or historical evidence to suggests that has not already been accounted for in ONS2016 Components of change population/housing projections requirement **-5,880** internal and **12,854** international migration 2015-2033. All of which have houses already or ONS2016 allocated within projections requiring **5,044** of the proposed **13,410** houses for demographic/affordability need.

Whatever uplift to Household Representative rates age 25-44, Affordability set at only 15% allocation does not address that issue. ONS CLG2016 trending rates have already allocated housing inclusive of volatile employment. "Policy On" intervention is not indicated by demographic and realistic economic outlook.

1.4 Alternatively should the housing requirement be lower taking into account factors such as the impact of Brexit and introduction of the standardised methodology for calculating Local Housing Need?

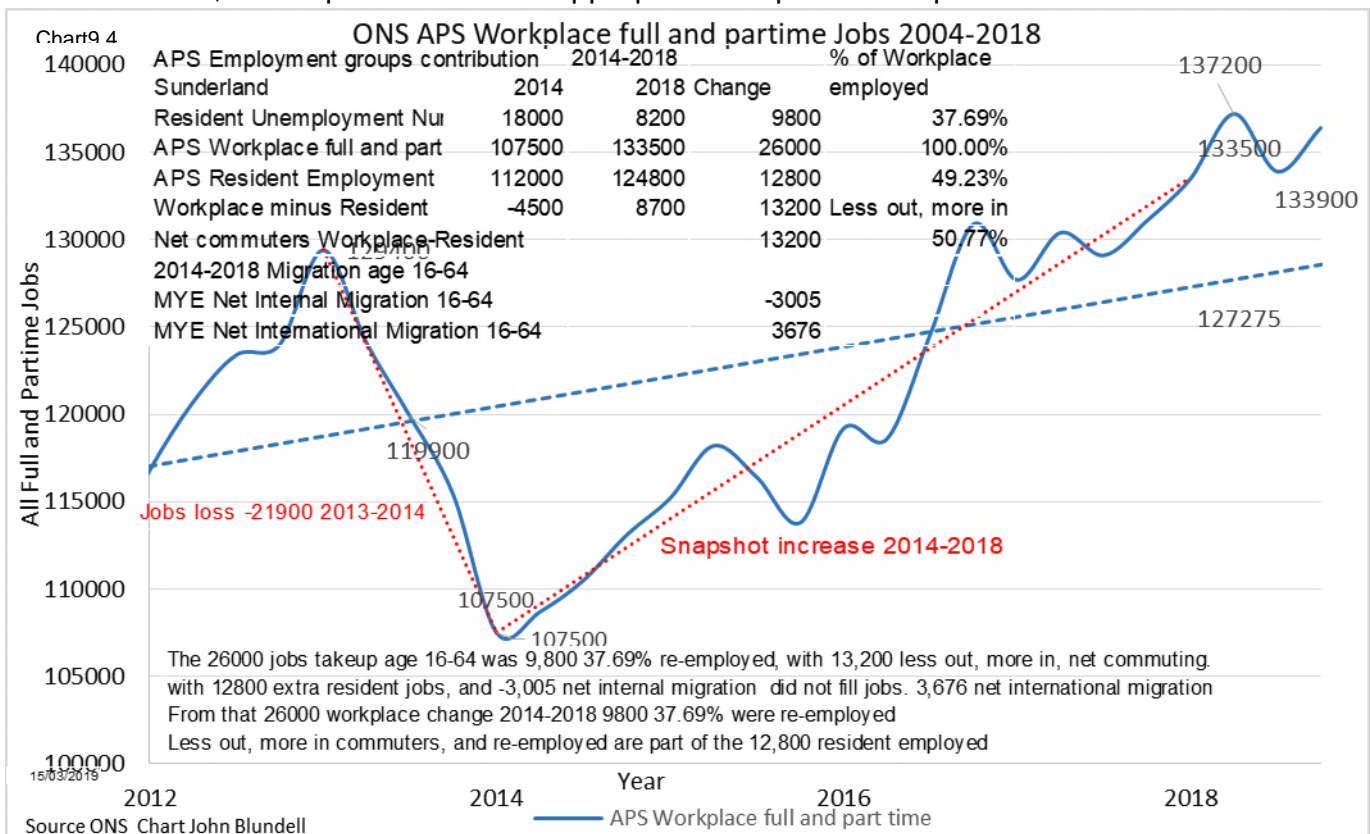
The latest ONS CLG2016 trending rates provide the most accurate projections. Any post-transition Standardised method has not been part of the Local Plan process, alternative Scenarios, or consultation. All of which is preferable to the "munbo jumbo" conjecture (DCLG Sec of State description) of OAN using bespoke pseudo-science conjecture. Whatever outcome of Brexit all forecasts will be realistically downward, as further indication that the Local plan is over ambitious. A Standardised method using superseded out-of-date Stop gap DLG2014 creates a **116%** increase as entirely inappropriate considering MHCLG expect that to be no more than 20% for any UK LA. Applying a revised 2018NPPF revision has never had a Public consultation, or ever been considered in the Scenario alternatives for OAN. The Standard method assessment for years 2015-2019 would be perverse and inapplicable to the 2018/19 NPPF revisions requiring a 10 year rate from the current year 2019-2029. The DCLG2014 disparity to CLG2016 demographic need for England is **30.80%** extra with the NE12LAs as **54.05%** extra is excessive non-commensurate impact by an imposed DCLG2014 on the NE12 benchmark housing requirement.

Table13.1	DCLG2014	CLG2016	Projection	
Demographic Change	2019-2029	2019-2029	Disparity	%
ENGLAND	2156773	1648866	507907	30.80%
Darlington	1585	1055	530	50.24%
Durham	12512	9676	2836	29.31%
Hartlepool	1790	1034	756	73.11%
Middlesbrough	2377	646	1731	267.96%
Northumberland	5809	4733	1076	22.73%
Redcar and Cleveland	949	1067	-118	-11.06%
Stockton-on-Tees	4568	3550	1018	28.68%
Gateshead	4150	2653	1497	56.43%
Newcastle upon Tyne	9331	5120	4211	82.25%
North Tyneside	7174	4244	2930	69.04%
South Tyneside	3150	1897	1253	66.05%
Sunderland	5440	2516	2924	116.22%
NE12LAs	58835	38191	20644	54.05%

Applying a Standard Method rate 2019-2029 for DCLG2014 is **10,265** or CLG2016 **4747** however that for an inappropriate 2015-2033 plan period. A more appropriate calculation is in **Table12,2a,b** below 2019-2039.

### 2.1 Does the evidence base support the OAN of at least 95 ha of employment land?

Inappropriate snapshot extrapolation can almost produce any required statistical justification for employment land. Sunderland employment record is a history of volatile swings **-21,900** 2013-2014 to **26,000** 2014-2018 and an expected imminent future downturn due to Brexit, as well as withdrawn international investment. Over ambitious employment aspiration predicated on selective cherry picking snapshots are not reliable or credible, as well as a pending Sunderland economic downturn. Subsequently any employment land needs to be revised downward to realistic, as opposed to the over ambitious, that is predicated on inappropriate snapshot extrapolation.



### 3.1 Is there sufficient alignment between housing and employment requirements?

The demographic housing need requirement is CLG2016 **4,824** 2019-2039.(DCLG2014 **9,653**) An addition for affordability although post transition is **5,275** 2019-2039 (DCLG2014 **11,405**) (**Table12.2b**). Clearly there is a disconnect between a required use of the latest data at **5,275** CLG2016 Standard method starting point even with further additions as misaligned with a Preferred option **13,410** (as **14,900** 2019-2039) predicated on an over ambitious **10,337** jobs expectation, with a housing disparity of **208.87%** more than for demographic need and **182.47%** more than the CLG2016 Standard method **5,275**. There is no alignment between housing and employment not least a draft jobs aspiration for **7,200** changed to **10,337** while Preferred housing remained as circa **13,400** as no alignment justification.

**Table12.2a**

NE12LAs 2019-2039	Preferred	CLG2016	Disparity	%	StdMthd	Disparity	%
Darlington	11380	1966	9414	478.84%	2272	9108	400.78%
Durham	26160	17765	8395	47.26%	19904	6256	31.43%
Hartlepool	5740	2068	3672	177.56%	2156	3584	166.24%
Middlesbrough	8444	1824	6620	362.96%	1363	7081	519.57%
Northumberland	17700	7207	10493	145.59%	10874	6826	62.78%
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Stockton-on-Tees	12290	6722	5568	82.83%	7805	4485	57.46%
Gateshead	11000	5612	5388	96.01%	5710	5290	92.65%
Newcastle upon Tyne	19000	10749	8251	76.76%	11185	7815	69.87%
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South Tyneside	12000	3733	8267	221.46%	4190	7810	186.39%
Sunderland	14900	<b>4824</b>	10076	<b>208.87%</b>	<b>5275</b>	9625	<b>182.47%</b>
Full NE12LA HMA	<b>159887</b>	<b>72173</b>	87714	<b>121.53%</b>	<b>82680</b>	77207	<b>93.38%</b>
Sunderland & Tees 5LAs	57434	19197	38237	199.18%	21154	36280	171.50%

**Table12.2b**

CLG2016	Preferred	CLG2016	Preferred		Standard	Preferred	
NE12LAs	Option	Demograph	Disparity	%	Method	Disparity	%
2019-2029	79944	38191	41753	109.33%	41340	38604	93.38%
2029-2039	79944	33982	45962	135.25%	41340	38604	93.38%
2019-2039	<b>159887</b>	<b>72173</b>	87714	<b>121.53%</b>	82680	77207	93.38%
Sunderland							
2019-2029	7450	2516	4934	196.10%	2637	4813	182.47%
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2019-2039	<b>14900</b>	<b>4824</b>	10076	<b>208.87%</b>	<b>5275</b>	9625	<b>182.47%</b>
<b>DCLG2014</b>							
NE12LAs	Preferred	DCLG2014	Disparity				
2019-2029	79944	58835	21109	35.88%	63666	16277	25.57%
2029-2039	79944	45668	34276	75.05%	63666	16277	25.57%
2019-2039	159887	104503	55384	53.00%	127333	32555	25.57%
Sunderland							
2019-2029	7450	5440	2010	36.95%	5703	1747	30.64%
2029-2039	7450	4213	3237	76.83%	5703	1747	30.64%
2019-2039	<b>14900</b>	<b>9653</b>	5247	<b>54.36%</b>	<b>11405</b>	3495	<b>30.64%</b>

Plan periods 2019-2039 used for comparison. Standard method rate using current year 2019 for 10 years. 4.773:1 There is also mis-alignment throughout the NE12 LAs full Housing Market area. Aspiration set at Preferred options as **159,887**, with a **121.53%** disparity more than CLG2016 **72,173** and **93.38%** disparity more than the **82,680** Standard method 2019-2039 as significant Duty to Cooperate failings. SunderlandCC Preferred Option in particular is excessive even to the other excessive LAs Preferred options at **208.87%** more than for demographic need, and **182.47%** more than the CLG2016 Standard method. Even using DCLG2014 SunderlandCC Preferred option **14,900** 2019-2039 is **54.36%** more than demographic need and **30.64%** more than that DCLG2014 Standard method. All of which is contrary to the Planning Inspectorate approved Plans 2010-2016 average **20%** more than for demographic need. **Chart2.2 below**

SunderlandCC with 5 Tees LAs HMA Preferred option **57,434** as **38,237 199.18%** more than CLG2016 **19,197**. Sunderland and 5 Tees LAs HMA using DCLG2014 as Preferred **57,434** to DCLG2014 **29,180** as **28,254 96.83%** more. Sunderland/Tees HMA using DCLG2014 or CLG2016 2019NPPF Standard methods as CLG2016StdMthd **171.5%** more, DCLG2014StdMthd **61.15%**. Then factor in all economic forecasts that Brexit whatever outcome is downward, a current stalling of investment with Sunderland in particular, and volatile swings unemployment history **-21,900** to **26,000** 2013-2018 confirms that there is significant mis-alignment between realistic, and aspirational. Sunderland flat lining house prices suggest no stress in the market as further evidence of no issue between housing and realistic employment expectation. ONS/CLG2016 in their Components of Change already factor in most of that as **12,854** international migration 2015-2033 **Chart1.1 above** or as **13,405** 2019-2039 that become resident the year after. ONS cannot predict an imminent long term downturn as the trending rate method is reliant on historic change 2011-2016, however **13,405** international migration that become resident is already allocated based on historic trending 2011-2016 inclusive of volatile swings employment records **-21,000** 2013-2014 and **26,000** 2014-2018. The Mid-Year Estimates actual data indicates that ONS2018 population, and CLG2018 Housing projection may well be even less than ONS/CLG2016 as further evidence that the **2019NPPF** revision of an imposed DCLG2014 is inappropriate, out-of-date and inaccurate assessment.