

Hearing Statement – Matter 2

Sunderland Core Strategy and Development Plan

On behalf of Barratt David Wilson Homes (North
East)

April 2019



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Barratt David Wilson Homes (North East)(BDW) in respect of:
- Matter 2: Spatial Strategy and Related Policies
- I.2. BDW has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.3. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with BDW's comments upon the submission version of the Sunderland Core Strategy and Development Plan, dated July 2018.
- I.4. BDW has also expressed a desire to attend and participate in Matter 2 of the Examination in Public.

2. Matter 2 – Spatial Strategy and Related Policies

Issue – The matter considers whether the strategy for the distribution of development is justified and whether related strategic policies are positively prepared, effective and consistent with national policy.

The spatial distribution of development across the sub-areas

1.1) Is the spatial distribution of development within the Sub-Areas clear from the Plan and justified??

- 2.1. **BDW maintains its original concerns** that the proposed Spatial Strategy through the Plan does not address Strategic Priority 1, which is to “deliver sustainable economic growth and to meet objectively assessed needs for employment and housing”.
- 2.2. The proposed Spatial Strategy does not appropriately distribute development over the plan period. At present the areas for economic growth and housing growth are not aligned and the interaction between new employment and new housing does not transcend through the Plan. There is therefore discordance between the employment and housing strategies within the Plan and therefore the Plan is internally inconsistent and it is not achieving its Strategic Priorities or Vision.
- 2.3. Furthermore, the Plan should cover a period for 15 years post adoption. The Plan currently is proposed to cover a period up to 2033, which if adopted potentially in early 2020 would be only 13 years and therefore two years short. The 2012 Framework is clear in stating in paragraph 157 that Local Plan should be drawn up over an appropriate timescale, preferably a 15 year time horizon. This is reinforced in the 2019 Framework which states in paragraph 22 that “strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure”. **BDW considers this Plan should be**

covering a 15 year period from the point of adoption in accordance with national guidance and therefore the Plan needs to incorporate the period up to 2035, which is a further 2 years.

- 2.4. BDW recognise that it is an exciting time for Sunderland. With a population of approximately 277,000 and an area of 137 square kilometres, Sunderland plays a key economic role within the wider North East Local Enterprise Partnership area. The new Local Plan sets out an ambitious Vision for Sunderland which is to be realised by a twin strategy of “regeneration” and “growth” to maximise Sunderland’s natural assets and build upon its competitive advantages for the future.
- 2.5. Sunderland has historically developed economically based upon coal, shipbuilding and the Port. It will develop going forward based upon Advanced Manufacturing and Automotive industries which have clearly different locational requirements. In terms of employment, the Local Plan confirms that Sunderland has a strong track record of attracting investment and growth and that the workforce is currently growing by 8% (1997-2015). It also notes that unemployment remains relatively high at 7.4% (compared to a regional average of 6.6% and a national average of 4.8%). The Employment Land Review confirms that there is approximately 145.9ha of employment land available in the city but that whilst Washington has experienced the strongest demand for employment land, there is likely to be “a shortfall of employment land within Washington”.
- 2.6. The most significant employment growth is expected within the Advanced Manufacturing and Automotive sector centred around Nissan. This sector employs 30,000 people regionally. The need to provide for large footplate industry to support these sectors is recognised through the International Advanced Manufacturing Park (IAMP) which will be situated to the north of Nissan and immediately to the east of the Washington Meadows site.
- 2.7. IAMP is to provide a world class environment for the automotive supply chain and related advanced manufacturers. Some 150 hectares of land is allocated for such uses through the IAMP Area Action Plan (AAP). This was increased, by the Inspector, from 100 hectares in the August 2017 Proposed Changes to the AAP which reinforces the importance and role of Washington. Therefore, with IAMP and Nissan it is clear that Washington is a significant regional employment growth pole and is the key area for economic development within Sunderland. IAMP will further strengthen this role as it is developed out during the Plan

Period, though the Local Plan still recognises that even beyond this, further employment land is required within Washington.

- 2.8. Sunderland comprises the main urban area of Sunderland, the coalfield communities (to the south and west of the City) and the new town of Washington. The Local Plan recognises that the historic evolution of Sunderland along with the more recent out-of-centre employment developments requires geographical planning that reflects its diversity of form. The Local Plan seeks to focus upon both the “urban core” and also “other places that make up the city”. BDW consider that a more focussed approach is necessary to reflect the diversity of Sunderland today, its new economic landscape and the need to deliver the “regeneration” and “growth” agenda.
- 2.9. Reflecting the employment and economic growth aspirations of Sunderland. BDW consider that the most appropriate spatial strategy is to recognise the importance of Sunderland urban area but to also recognise the “polycentric” nature of the Local Authority area by designating Washington as a “Principle Growth Settlement”, due to the growth at IAMP, and hence differentiating it from the Coalfield communities which would be designated “Growth Settlements”. In this way the focus upon “regeneration” within the urban areas is maintained but this spatial strategy sets out a framework for identifying suitable “growth” areas through sustainable urban extensions based upon the principles of “sustainable development”.
- 2.10. BDW fully support the growth ambitions of Sunderland especially around the “automotive cluster” created by Nissan. BDW are also fully supportive of the development of IAMP to underpin the continued success of the automotive and advanced manufacturing sectors and to deliver supply chain benefits for Nissan. However, there is insufficient housing focussed on Washington to take advantage of the economic growth ambitions generated by IAMP. This under provision could potentially undermine both the plan and the benefits from IAMP.
- 2.11. The development of new housing will bring forward additional economic benefits to the area. The relationship between economic performance in an area and housing is complex, but having the right quantity, quality and balance of housing in an area is necessary for economic growth. The development of new housing can therefore support local economic growth, both through direct job creation through the construction phase of the scheme, but also through the increased population which will create sustainable local jobs from the increased demand for goods and services. This provides an important sustainable development opportunity in Sunderland and Washington.

- 2.12. Importantly the HBF released in July 2018 its report on “the economic footprint of house building in England and Wales”, which shows that house building in England and Wales is now worth £38bn a year and supports nearly 700,000 jobs. House building activity contributes economically in different ways including providing jobs, tax revenues and contributing funding for local infrastructure and communities. House building supports the economic in a wider sense through being drive for economic growth; delivering jobs and economic value; supporting labour market mobility; creating skills and employability; enhancing place competitiveness; creating quality of place and reusing brownfield land.
- 2.13. An important conclusion of the report and the wider economic benefits is that a healthy, well-functioning labour market requires a good supply of housing that is affordable for local people to enable them to move jobs freely and match up skills supply with employer demand. A dysfunctional housing market can inhibit labour market mobility, in turn stifling economic growth.
- 2.14. BDW considers that with the economic growth within the Washington area the housing market needs to similarly grow to ensure that the Sunderland economy reaps the benefits from all the investment. The existing market in Washington is predominately made up of settled seniors and growing families. With the development of IAMP, it is anticipated that there will be a huge influx of upwardly mobile people. These people will have the potential to purchase houses that are predominantly not available in the Washington area. Upwardly mobile people, including prosperous families and prospering singles, will desire larger/higher specification properties. **BDW therefore considers that the Plan needs to cater for these needs.**
- 2.15. BDW consider that the sustainable urban extension to the east of Washington “Washington Meadows” can deliver much needed “aspirational housing” to meet the housing needs of Sunderland in a highly sustainable location immediately adjacent to both Nissan and IAMP. The unique opportunity at Washington Meadows, adjacent to IAMP, creates the ability for a scheme to diversify the housing offer providing smaller properties through to family and larger homes within walking distance of new major inward investors and significant job opportunities. There is also the possibility for the provision of self-build plots within the scheme.
- 2.16. Attached to the Hearing Statement for Matter 7 is a Delivery Statement and a Masterplan Framework which shows the masterplan and vision for Washington Meadows and

demonstrates how the scheme will support the co-existence of jobs and homes with the ability for workers to access jobs by public transport, foot and cycle rather than having to rely upon the private car. It will also deliver new expenditure, green infrastructure, walkways and community facilities to support and reinforce the existing services within Washington new town.

2.17. To achieve this approach, BDW consider that the Local Plan should:

- Focus the majority of development upon Sunderland urban area but review the likely housing yield from “urban” SHLAA sites to ensure that they can all be delivered within the Plan Period. We consider that the number of houses expected from this source should be reduced. Analysis shows that over the first 5 years alone this could be reduced by circa 1,500 dwellings. BDW is therefore substantially concerned with the expectations from this source over the whole plan period. This is explained in more detail in response to Matter 4.
- Prioritise Washington as a “Principle Growth Settlement” and seek to focus new housing and development into it to maximise the benefits of its role as an economic growth hub. This too would require a reassessment of the likely housing yield from “urban” SHLAA sites to ensure that they can all be delivered within the Plan period but also the allocation of Washington Meadows as a sustainable urban extension to be delivered in part within the Plan Period. This would more appropriately recognise the role and importance of Washington.
- Identify the Northern Coalfield Settlements as “Growth Settlements” to meet more localised housing and employment needs whilst supporting the role that new housing development can play in driving forward regeneration within these settlements.

2.18. BDW consider that the above approach meets the Local Plan vision and addresses the Strategic Priorities identified within the Local Plan but is one that is more aligned with the principles of sustainable development.

1.2) Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions??

2.19. BDW has no specific comment in relation to this issue.

The split between the Existing Urban Area and elsewhere and between brownfield and greenfield land

2.1) Is the split between the Existing Urban Area and elsewhere and between brownfield and greenfield land clear from the Plan and justified?

2.20. BDW does not consider the Local Plan to be particularly clear in relation to the approach on brownfield and greenfield and between Existing Urban Area and other settlements. There is reference in paragraph 4.22 to a split of 44% brownfield and 56% greenfield within the Existing Urban Area, which is generally supported. BDW therefore considers that further clarification and justification is required.

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

2.21. BDW considers that the Council has considered brownfield to meet development needs. BDW considers that in certain instances the Council has not fully appreciated delivery and viability issues with previously developed land and that delivery matters should be further explored to create a robust trajectory for the future housing land supply of the City. A number of sites in the Council's SHLAA which are expected to come forward and meet the housing needs of the City have been around for a long time have significant constraints, including viability and are struggling to come forward. This will be further explored in Matter 4 and area specific sessions.

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?

2.22. BDW consider that a cautious approach to identifying further brownfield land, particularly in Key Employment Areas. Similar to earlier comments there are significant issues with some brownfield sites in relation to deliverability and viability concerns.

Green Belt and Exceptional Circumstances

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

2.23. Due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within Sunderland.

2.24. BDW considers that “exceptional circumstances” has been demonstrated. The 2012 Framework states in paragraphs 83 to 85 that Green Belt boundaries can be amended through the preparation and updating of plans and the Council has explained that in order to meet the housing need in the authority development outside the Urban Area is required.

2.25. The housing needs of Sunderland are putting severe pressure on the local authority to review the Green Belt. To meet the housing requirement Sunderland City Council recognises that some Green Belt land will need to be released for new housing land. The sites at East of Washington (Washington Meadows) and North of High Usworth are unique opportunities to positively use the Green Belt and meet the housing needs for the area.

East of Washington (Washington Meadows)

2.26. The Local Plan confirms that the scale of the need for both housing and employment is such that it cannot be met fully within the existing urban area. The Local Plan recognises that to

meet these needs there is a requirement to incur into the Green Belt and hence that in principle “exceptional circumstances” to justify Green Belt release have been shown. BDW supports this view.

2.27. BDW also recognise the importance of paragraph 84 of the Government’s “Framework”:

When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

2.28. In line with the above principle, Green Belt release should be in accord with the Spatial Strategy and hence should focus upon the higher order settlements of Sunderland and Washington. These are the most sustainable settlements and hence it is these settlements that should be the focus of potential Green Belt release.

2.29. The Local Plan evidence base includes detailed assessments of land parcels to sieve the process to ensure that the most appropriate Green Belt releases are proposed. As part of that process, the Local Plan proposes the release of Washington Meadows from the Green Belt (as sites 401 and 697). BDW support the release of this site from the Green Belt. However, BDW maintain the position that the Washington Meadows site should be allocated for housing use rather than being “safeguarded”.

2.30. It is clear from the site location plans and analysis that development of the site would not have a material impact on the Green Belt. The site is within a highly sustainable location on the edge of the built up area with development and major roads around its edge. The site does not serve any Green Belt purpose and as such development for residential purposes would create a logical long term boundary to the Green Belt.

2.31. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town. Therefore, although the site is in the Green Belt it is a logical scheme with significant major benefits.

- 2.32. BDW has prepared and submitted a Delivery Statement and Masterplan Framework (which is appended to the Matter 7 Hearing Statement for Washington). These demonstrate that the site is available, suitable and achievable and therefore deliverable in accordance with national guidance. The site can also deliver significant environmental, economic and social benefits which are explained in the Delivery Statement and Masterplan Framework. The site has been fully assessed and can come forward in the short term to address the housing needs of the area.
- 2.33. BDW support the site's release from the Green Belt for safeguarded land, but consider that the site should be allocated for housing.

North of High Usworth

- 2.34. Similarly, BDW support the release of the site at North of High Usworth for housing. It is evident from analysis of the site that it would not have a material impact on the Green Belt. The site is located within a highly sustainable location on the edge of Washington. It performs the logical extension of Washington's urban area. The site's development would clearly accord with the emphasis set out in the Framework, particularly concerning the need to make more efficient use of land.
- 2.35. Furthermore, the sites benefit from being located close to a range of services and facilities, including local shops, public houses, primary school and other community facilities. The site is also within walking distance to bus routes to Newcastle and Sunderland.
- 2.36. The Local Plan evidence base includes detailed assessments of land parcels to ensure that the most appropriate Green Belt releases are proposed. As part of that process, the Local Plan proposes the release of North of High Usworth from the Green Belt (as site 567). BDW support the release of this site from the Green Belt.
- 2.37. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not lead to urban sprawl, result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town. The site effectively rounds off the Washington Urban Area with housing off Stone Cellar Road to the south and the Golf Course car park and housing to the east. The A194(M) is located to the west. The new

Green Belt boundary will be defined by an existing wide tree belt along the northern edge of the site, which accords with the principles of the Framework. Therefore, although the site is in the Green Belt it is a logical scheme with significant major benefits.

2.38. The site therefore does not serve any Green Belt purpose and as such development for residential purposes would create a logical long term boundary to the Green Belt.

2.39. Furthermore, the site is a suitable Green Belt change, providing a more logical, robust and defensible green belt boundary for the future.

3.2) Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities?

2.40. BDW has no specific comment in relation to this issue.

The principle of safeguarded land being identified to meet longer-term development needs

4.1) Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs?

2.41. BDW supports the conclusion that “exceptional circumstances” exist to warrant release of Green Belt as part of the Local Plan for safeguarding for longer term development needs. The Framework states that in undertaking Green Belt reviews boundaries should be amended for the long term. Paragraph 85 of the 2012 Framework states that Green Belt boundaries should “identify land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period”.

2.42. However, in line with responses to other Questions and earlier representations, BDW considers that the land East of Washington (Washington Meadows) which is proposed to be safeguarded land should be allocated for housing to meet development needs now within

the Plan Period, particularly with the progress of the adjacent employment site at IAMP and the need to align the economic and housing strategies.

4.2) Has enough land been proposed for safeguarding to meet longer-term development needs?

2.43. BDW has no specific comment in relation to this issue.

4.3) In general terms is the safeguarded land in the right place to meet longer-term development needs?

2.44. Given the developments at IAMP, BDW considers that the focus for growth in future years is Washington and therefore identifying safeguarded land to the east of Washington, at Washington Meadows is the most appropriate approach.

Proposed Change

2.45. To overcome the objection and address soundness matters, the following changes are proposed:

- Review and amend the Spatial Strategy to maximise the benefit of Washington as an economic growth hub and allow for an urban extension to the east of Washington.
- Allocate land to the east of Washington “Washington Meadows” for a sustainable urban extension.
- Allocate at least a first phase of housing at Washington Meadows (for around 150 to 750 dwellings).
- Extend the Local Plan up to 2035 to cover a 15 year period from adoption.