

Sunderland City Council Response to Matters, Issues & Questions

Matter 7 - The Strategy and Housing Growth Areas for North Sunderland

1. Strategic Policies

1.1 Are Policies SP4 and SS4 justified and effective

The Council considers that both policies are justified and effective and this is explained in paragraphs 6.394-6.441 of the Sunderland Compliance Statement (SD.66; pgs. 149-165). These paragraphs set out the justification for both policy SP4 and SS4, the steps taken by the Council to liaise and work with neighbouring authorities, how the policies will be monitored and that the policies will be delivered through the submission and determination of planning applications.

2. Identification of Sites

2.1 Do the Green Belt assessments support the HGAs in North Sunderland and demonstrate exceptional circumstances for the removal of land from the Green Belt?

Policies SP4 and SS4 are addressed in the Compliance Statement (SD.66; paras. 6.394-6.441, pgs.149-165), and this demonstrates that the proposed allocation of HGAs within the Sunderland North Area has followed a logical Green Belt Review and site selection process (SD.29 to SD34). This concluded that the proposed allocations can and should be released from the Green Belt to contribute to meeting Sunderland's OAHN. Failure to release these sites would either result in a Sunderland's OAHN not being met or would require alternative and potentially less suitable and sustainable areas of Green Belt land to be released for housing.

2.2 If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan

Paragraphs 4.19-4.28 of the Plan (SD.1; pgs. 33-34) explain how the Council has explored all sustainable and viable options to maximise the amount of development within the urban area, optimising densities and ensuring that all land is appropriately used. This is supported by the Exceptional Circumstances for Releasing Land from the Green Belt paper (SD.33), which explains this matter fully.

The Council has proposed a modification in the updated Schedule of Main Modifications (MM12) which provides a summary of the exceptional circumstances for each of the sites.

2.3 Are the configuration and scale of the HGAs justified taken into account development needs and the Green Belt assessments?

Paragraphs 2.49 and 4.49 of the Plan (SD.1; pgs.19 and 43) confirm that limited growth has taken place within North Sunderland due to tightly drawn Green Belt

boundaries. The SHLAA (SD.22) sets out that the majority of the identified land supply is located away from North Sunderland. Consequently, without release of Green Belt land at North Hylton (HGA7) and Fulwell (HGA8) only 1,110 homes are identified to come forward in this highly sustainable spatial area between 2018 to 2033 (SD.22; para. 5.15; pg. 32). The two Housing Growth Areas will provide an additional 190 new homes to the area. The scale of development proposed at North Hylton (HGA7) and Fulwell (HGA8) is not considered to unduly alter the character of the area as set out within the Compliance Statement (para. 6.410; pg.151).

3. HGA7 - North Hylton

3.1 Does the updated HRA indicate that development of the site will have no significant effects on the integrity of the Coastal Sites of European Importance?

The HRA reports (EX1.014 & EX1.015) set out that the site will have no significant effects on the integrity of the Coastal Sites of European Importance. The Council has signed a Statement of Common Ground with Natural England which confirms this (EX1.016).

3.2 Is the Council satisfied that the landscape, heritage, biodiversity, access, transport drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

Paragraph 6.433 (pgs.159-161) of the Compliance Statement (SD.66) demonstrates how each of the above constraints are capable of being mitigated, enabling acceptable site development. Where relevant, specific policy constraints are addressed in the Sunderland Development Frameworks (SD.35) (see Development Principles and Parameters) and as site specific criteria in Policy SS4. The Council has also carried out a city-wide Transport Assessment (SD.51-53) and the Local Highway Authority concludes that the impact to the local road network is acceptable.

Subject to modifications proposed in the Schedules of Main and Additional Modifications, Statements of Common Ground have been signed between the Council and Natural England, Historic England and the Environment Agency (SD.8k), and all parties find the Plan to be sound.

3.3 Are all the policy requirements within HGA7 necessary and clear to the decision maker?

As a greenfield, urban fringe site, the policy requirements are considered necessary to ensure that a high-quality development is achieved on site and that it appropriately addresses all site requirements. The inclusion of policy criteria is clearly supported by statutory bodies such as Natural England and Historic England, as demonstrated in their submissions and Statements of Common Ground. The policy requirements have been informed by the Development Frameworks (SD.35) and provide clear guidance to decision makers to ensure that sensitive and appropriate site design is fully achieved.

3.4 Is the site deliverable?

Page 41 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Hellens Group, is available for development and is a deliverable site. The Development Frameworks (SD.35) demonstrate how the site can be sustainably developed, subject to addressing development principles and parameters. With regards to site viability, the Whole Plan Viability Assessment concluded that the Council can be confident that greenfield sites are viable and will be forthcoming, during the Plan period (SD.60; para.12.6; pg.175).

4. HGA8 – Fulwell

4.1 Does the updated HRA indicate that development of the site will have no significant effects on the integrity of the Coastal Sites of European Importance?

The HRA reports (EX1.014 & EX1.015) set out that the site will have no significant effects on the integrity of the Coastal Sites of European Importance. The Council has signed a Statement of Common Ground with Natural England which confirms this (EX1.016).

4.2 Is the allocation appropriate in view of the need for a Playing Field Assessment?

The Council considers that the allocation is wholly appropriate.

It should firstly be noted that the site in question is currently designated as Green Belt.

As set out within the submitted Exceptional Circumstances Report (SD.33), the Council considers that there are exceptional circumstances present which justify amendments to the Green Belt boundary.

Since the site in question is currently designated as Green Belt, if this was not released from the Green Belt as part of the current Green Belt Review at this point in time, it is unlikely that this could be revisited until well beyond the Plan period ends in 2033. Bearing in mind the intended permanence of Green Belt boundaries, the intention to ensure that boundaries are capable of enduring beyond the Plan period and requirement for the Council to satisfy themselves that Green Belt boundaries will not need to be altered at the end of the Plan period (Paragraphs 83 and 85 of the NPPF), the Council is concerned that if this site was not released from the Green Belt at this time, that the approach would be inconsistent with the NPPF.

The Council has received circa £12 million as part of an £18 million project from a number of funding partners including Sport England to develop three Community Football Hubs. As part of the funding requirements set out by the Football Foundation and Sport England the Council is required to undertake an updated Playing Pitch Assessment two years after the opening of the new Community Football Hubs (current build timeline suggests this assessment will commence at the end of 2021).

The submitted Playing Pitch Plan (SD.44: pg. 22) demonstrates that the site contains a disused playing pitch which was last used in 2015. Taking into consideration that the pitch has not been required for the last four seasons and that additional provision will be provided within this locality by the new Community Football Hub at Sunderland North, the Council is confident that the site will be deemed surplus to requirement at this point in time. This view has also been informed by projected use studies prepared as part of the funding bid for the Community Football Hubs.

The new Community Football Hubs are currently under construction and are anticipated to open in the 19/20 season and therefore it is anticipated that the updated Playing Pitch Assessment would commence in late 2021 and be completed in early 2022. Therefore, the Council would be concerned if the site was not taken out of the Green Belt and allocated at this point in time, as due to national Green Belt policy it would be unlikely that another Green Belt review will be undertaken until well beyond the Plan period.

It should also be noted that the Council has now signed a Statement of Common Ground with Sport England (EX.1.011), which indicates that they are agreeable with the inclusion of the site within the Plan subject to the proposed modification set out in the updated Schedule of Main Modifications (MM11).

4.3 Is the Council satisfied that heritage, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

Paragraph 6.439 (pgs.163-164) of the Sunderland Compliance Statement (SD.66) demonstrates how each of the above site constraints are capable of being mitigated, enabling acceptable site development. Where relevant, specific policy constraints are addressed in the Sunderland Development Frameworks (SD.35). The Council has also carried out a city-wide Transport Assessment (SD.51-53) and the Local Highway Authority concludes that the impact to the local road network is acceptable.

Subject to modifications proposed in the Schedules of Main and Additional Modifications, Statements of Common Ground have been signed between the Council and Natural England, Historic England and the Environment Agency (see SD.8k), and all parties find the Plan to be sound.

4.4 Is the site deliverable?

Page 43 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is Council owned, is available for development and is a deliverable site. The Council's Viability and Marketing Report for HGA8 (PD3375) confirms that the site is both viable and deliverable, providing a comparable figure per unit to other high demand areas of Sunderland which are achieving £30-£40k per unit. The Development Frameworks (SD.35) demonstrate how the site can be sustainably developed, subject to addressing development principles and parameters. With regards to site viability, the Whole Plan Viability Assessment concluded that the Council can be confident that greenfield sites are viable and will be forthcoming, during the Plan period (SD.60; para.12.6; pg. 175).

5. Infrastructure

5.1 Will the infrastructure to support the scale of development proposed in North Sunderland be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space.

The Council recognises that to deliver the Plan, sufficient infrastructure is required to support the levels of development proposed, in accordance with the NPPF.

The Council has prepared an Infrastructure Delivery Plan (SD.59) which has been informed by a Transport Assessment (SD.51 – 53) and Education Plan (SD.62). These reports detail the strategic infrastructure needed to deliver the Plan. Other policies of the Plan, will require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure (SD.1; pgs. 117-118). Policy NE4 stipulates open space requirements for major residential development sites (SD.1; pgs. 88-89).

To demonstrate that the scale of development proposed on the allocated sites in the North Sunderland area is achievable, the developers of each of the 2 HGA sites have submitted representations as part of the Plan stating that the sites are deliverable in the Plan period and the essential infrastructure required as part of each scheme can and will be delivered.

Policy SS4 identifies specific requirements and these have been informed by the Development Frameworks (SD.35). Development proposals will be expected to continue towards the delivery of “essential” infrastructure of priority needs, as identified in the IDP (SD.59; Section 7; pgs. 84-87), through planning contributions, where appropriate. Development proposals must meet the planning tests set out in the Community Infrastructure Levy Regulations 2010 (Regulation 122), which are set out in paragraph 14.11 of the Plan in order to obtain planning contributions toward essential infrastructure schemes.

In terms of health infrastructure, the Clinical Commissioning Group (CCG) has commenced work on collecting the requisite evidence and shared some initial findings with the Council, but further work is required. The Council has committed to continuing to work closely with the CCG on gathering evidence regarding health infrastructure needs and will update the Infrastructure Delivery Plan, as necessary when a robust evidenced need can be demonstrated.

6. Delivery

6.1 Are the assumptions about the rate of delivery of sites in North Sunderland realistic (anticipated delivery is shown in Appendices A,B,F and L of the SHLAA)?

The Council considers that the rate of housing delivery from the sites in North Sunderland is realistic.

The sites set out within the SHLAA (SD.22) are all subject to assessment in line with the methodology which was endorsed by the SHLAA Partnership in 2016 to assess their deliverability. Sites are updated on an annual basis and then discussed with the SHLAA panel and suggested changes are incorporated where necessary. Once the suitability, availability and achievability of sites has been assessed, and the constraints identified, the likely timetable and rate of development for each site is then identified. Advice is sought from developers on likely timetables for construction, start up, site preparation, site delivery rates and any further constraints that may arise (SD.22; para. 4.55; pg. 22).

A standard rate of 30 dwellings per annum is used for a single developer site. Where developers indicate that a higher delivery rate is possible for their site, this was taken into consideration and reflected in delivery forecast for the site. Similarly, lower delivery rates in lower market areas will be considered where indicated (SD.22; para. 4.61; pg. 23).

A cautious approach has been taken regarding the rate of delivery of the HGA sites. Of the two sites in North Sunderland, neither of these sites have been put forward in the 1-5 year category, despite the developer for site HGA7 indicating that this was feasible. Site HGA7 is expected to commence in the 6-10 year period, while site HGA8 is expected to commence in the 11-15 year period. A standard maximum rate of 30 dwellings per annum has also been applied.