

Sunderland City Council Response to Matters, Issues & Questions

Matter 7 – The Strategy and Growth Area for South Sunderland

1. Strategic Policies

1.1 Is Policy SP5 justified and effective?

The Council considers that Policy SP5 is justified and effective, and this is explained in paragraphs 6.442-6.469 of the Compliance Statement (SD.66; pgs.165-172). Specifically, these paragraphs set out the justification for the policy, the steps taken by the Council to liaise and work with neighbouring authorities, how the policy will be monitored and that the policies will be delivered through the submission and determination of planning applications.

2. Port of Sunderland

2.1 Is Policy SS5 positively prepared, particularly in addressing issues of transport links and flood risk?

The Council considers that Policy SS5 is positively prepared. With regard to flood risk, the Council has prepared a Level 2 SFRA for the Port (SD.50) and submitted this as part of the evidence base. The Environment Agency (EA) are satisfied with the approach taken to flood risk for the port, as set out in the Statement of Common Ground agreed between the Council and the EA (SD.8k).

With regard to transport links, the Policy is positively prepared as it assists in delivering the Spatial Vision and Strategic Priorities 1, 2, 5 and 11 (SD.66; paras. 6.471-6.472; pg. 172). This is evident in criteria 1 of the Policy SS5, as well as The Port's role in the delivery of the SSTC (SD.66; paras. 14.32-14.39; pgs. 514-516).

3. Identification of Sites and Protected Areas

3.1 Does the SHLAA support the SSGA?

The four sites that make up the South Sunderland Growth Area (SSGA) are all set out within the SHLAA as being deliverable, having been assessed as part of the SHLAA methodology and discussed and agreed with the SHLAA panel with regard to dwelling numbers and expected delivery rates (SD.22, appendix A, Schedule of Deliverable and Developable Sites, pgs. 36-43, site ref: 062, 081, 426A, 477).

3.2 Is the configuration and scale of the SSGA sites justified taking into account development needs and the SHLAA and other assessments?

As set out in the Compliance Statement (SD66; paras. 6.499- 6.507; pgs.178-180) the SSGA has been identified as a potential strategic growth area for a number of years to assist in meeting the city's housing numbers and includes two unimplemented extant residential allocations from the UDP (Chapelgarth and Cherry Knowle), an unimplemented employment allocation (South Ryhope), which is no

longer required and a site de-allocated from the settlement break (Land North of Burdon Lane).

The SSGA has the potential to substantially increase choice in the housing market, in particular having the potential to provide significant numbers of much needed larger family homes and executive dwellings in line with the SHMA (SD.23; para. 7.6, pg. 106; Tables 7.4-7.5, pgs. 108-109; and para. 8.25, pg.129).

The location of the sites, being on the edge of the existing urban area provide the opportunity to create a new sustainable community, supported by a range of infrastructure. Most of the sites have the benefit of planning permission, with development underway at the Chapelgarth and Cherry Knowle sites.

3.3 Is the configuration of the settlement breaks justified?

The Compliance Statement (SD.66; paras. 6.175–6.179 and 12.172-12.178; pgs. 78 and pgs. 440-443) and Settlement Break Review (SD.48; Sections 1-4, pgs. 11-47) provide a full justification for the configuration of Settlement Breaks. All reasonable alternatives were reviewed and a justification for their dismissal is provided within the Compliance Statement (SD.66; paras. 6.457, 6.462-6.464, 6.467 & 12.177-12.178; pgs. 167-169 and pg. 443).

As set out in the Settlement Break Review (SD48; Section 4 – South Sunderland; pgs. 37-47) it was concluded that the entire Settlement Break (relating to the SSGA area) could be removed as development would not unduly affect the separation of Doxford Park, Ryhope and Silksworth.

4. SSGA

4.1 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 sites would be acceptable?

The Draft South Sunderland Growth Area (SSGA) SPD (SD.36) demonstrates how each of the site constraints are capable of being mitigated and includes requirements which need to be adhered to ensure an acceptable form of development which takes on board site constraints.

It should be noted that the Draft SPD has been developed in consultation with the relevant landowners/developers, stakeholders and the local community and informed by comments received during pre-consultation.

4.2 Are all the policy requirements within Policy SS6 necessary and clear to the decision maker?

It is considered that all the policy requirements – as modified by MM13 set out in the updated Schedule of Main Modifications – are necessary to ensure the comprehensive development of the site and the creation of a new high quality, vibrant and distinctive neighbourhood and ensure the necessary infrastructure is delivered at the right time. The policy requirements are clear to the decision maker

and paragraph 4.62 of the CSDP (SD.1; pg. 47) sets out that all development on the SSGA should be in accordance with the SPD, which provides further detail and makes clear what the Council's expectations are for development proposals.

4.3 Is the requirement for 10% of homes to be affordable justified?

The 10% affordable housing requirement is a proportion that was set out in previous draft versions of the Plan, which were subject to viability testing in 2010. Updated viability work in 2014 (SP.14) sought to increase this target up to 15%, however at that time the City Council took a cautious approach in recognition of site viability and continued to apply the 10% requirement.

In line with this previous draft Plan and the timings of SSGA the affordable housing ask for the SSGA sites was 10% and as such was included within the viability work for the SSGA and informed the site asks. See Compliance Statement (SD.66, para. 6.506, pg. 180). It is therefore considered that the 10% of homes to be affordable is justified.

4.4 How does the South Sunderland Supplementary Planning Document (SPD) relate to Policy SS6?

The draft SSGA SPD (SD.36) provides further detail/guidance on the criteria within Policy SS6 and makes clear what the Council's expectations are for development proposals. Policy SS6 is intended to give an overview of the SSGA and set out what the overall development should deliver, whereas the SPD provides the detail behind this, which would be to drawn-out if included within the policy.

The draft SPD has been developed in consultation with the relevant landowners/developers, stakeholders and the local community and informed by comments received during pre-consultation on the SPD. It is intended that this would be formally adopted as an SPD following the adoption of the Core Strategy.

4.5 What is the up-to-date position in relation to planning permissions for the sites in the SSGA?

	Planning Status		Starts	Completions
Chapelgarth	Outline consent for 750 units granted 21/12/16	Reserved matters for 160 units granted 17/05/17	13	4
Land North of Burdon Lane	Planning application expected			
Cherry Knowle	Outline consent for 496 granted 26/06/17	Full planning permission for 304 units granted 26/06/17	59	3

South Ryhope	Outline consent for 450 units granted 22/12/17			
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4.6 Are the sites deliverable?

It is considered that all of the sites are deliverable as they have been assessed through the SHLAA process for their suitability, availability and achievability in line with the methodology which was endorsed by the SHLAA Partnership in 2016. Appendix N of the SHLAA sets out the detail on each site (SD.22c, site 062,081,426A, 477).

Due to the strategic nature of these sites and the masterplanning work behind them there has been ongoing engagement with the developers and land owners to ensure their deliverability. The SSGA has been subject to its own Infrastructure Delivery Study (SP.24) and Viability Assessment (SP.25) to ensure that the sites are deliverable.

5. Infrastructure

5.1 Will the infrastructure to support the scale of development proposed in South Sunderland be provided in the right place and at the right time, including that related to transport, the highway network (particularly the Ryhope-Doxford Link Road), 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). This details the strategic infrastructure needed to deliver the Plan. Other policies of the Plan 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).

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.

The proposed transport infrastructure is key to supporting the delivery of new homes within the SSGA. Transport infrastructure requirements were originally considered and assessed as part of a transport modelling exercise for SSGA (SP.27), which was subsequently utilised and incorporated within the Local Plan modelling. This modelling identified the need to complete the missing link section of the Ryhope

Doxford Park Link Road (which is also a requirement of Policy SP10). As such, the missing link section of the Ryhope Doxford Park Link Road has been one of the key Section 106 infrastructure asks included with the Infrastructure Delivery Strategy for the SSGA. SSGA developments which to date have been granted planning consent, have been required to enter into a Section 106 agreement with phased contributions as the sites are built out.

6. Delivery

6.1 Are the assumptions about the rate of delivery of houses from sites in South Sunderland realistic (anticipated delivery is shown in Appendices A, F and N of the SHLAA)?

The Council considers that the rate of delivery of houses from sites in South 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 of any further constraints that may arise (SD.22; paragraph 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 will be taken into consideration and reflected in delivery forecasts for the site. (This is the case for sites within the SSGA, who anticipate higher build rates due to more than one builder being on site). Similarly, lower delivery rates in lower market areas will be considered where indicated (SD.22; paragraph 4.61; pg. 23).