

Sunderland City Council Response to Matters, Issues & Questions

Matter 7 - The Strategy and Housing Growth Areas for The Coalfield

1. Strategic Policies

1.2 Are Policies SP6 and SS7 justified and effective?

The Council considers that both policies are justified and effective, and this is explained in paragraphs 6.511-6.575 of the Compliance Statement (SD.66, pgs.181-211). Specifically, these paragraphs set out the justification for each policy, 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 and Protected Areas

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

Policies SP6 and SS7 are addressed in the Compliance Statement (SD.66; paras. 6.511-6.575; pgs.181-211), and this demonstrates that the proposed allocation of HGAs within the Coalfield area has followed a logical Green Belt Review and site selection process (SD.29-34). 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 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.

Paragraphs 6.552-6.553, 6.558–6.559 and 6.564-6.566 of the Compliance Statement (SD.66; pgs.196-205) demonstrate that a logical Green Belt Review and site selection process has been undertaken (SD.29-34).

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 (M16) in the updated Schedule of Main Modifications which provides a summary of the exceptional circumstances for each of the sites.

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

Paragraphs 2.49 and 4.64 of the Plan (SD.1; pgs.19 and 48) confirm that significant development has taken place in and around the Coalfield in the past, due to the tightly drawn Green Belt boundaries around the northern part of the city directing development towards the South of the city, which is less constrained by a Green Belt designation. This has placed undue pressure on the Open Countryside and Settlement Breaks within the western and southern parts of the Coalfield.

The three HGA sites (HGA9, HGA10 & HGA11) will support the sustainable growth of the northern Coalfield over the Plan period, directing development to the most sustainable locations whilst protecting environmental assets of the Settlement Breaks and Open Countryside from further development encroachment. The HGA sites will also serve to address the imbalance of available housing within the city and will ensure that housing needs are adequately met in all locations across the city. The justification for the spatial strategy and distribution of housing to meet housing needs is fully explained in the Compliance Statement (SD.66; paras. 6.29-6.208; pgs. 38-85).

The scale of development proposed within the three HGA sites in the Coalfield will provide an additional 615 new homes in addition to the 2,845 homes (28% of city total) identified for development in the Coalfield between 2018-33 (SD.22; para. 5.15; pg. 32). The scale of development proposed at Penshaw, New Herrington and at Philadelphia is not considered to unduly alter the semi-rural area character and the Council justifies their removal from the Green Belt in the Compliance Statement (SD.66; paragraph 6.550-6.572; pgs. 195-210).

2.1 Are the configurations of the settlement breaks justified?

The Compliance Statement (SD.66; paras. 6.175–6.179 and 12.172-12.178; pgs. 78 and 440-443) and Settlement Break Review (SD.48; Sections 5-16, pgs. 48-170) 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. 6.523-6.525, 6.534 & 12.177-12.178; pgs. 183-185 and 443).

3. HGA9 – Penshaw

3.1 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 site would be acceptable?

Paragraph 6.556 (pgs. 197-199) of the Compliance Statement (SD.66) demonstrates how each of the above site constraints are capable of being mitigated, enabling acceptable site development. Where relevant, specific constraints are addressed in the Development Frameworks (SD.35) (see Development Principles and Parameters) and as specific policy criteria in Policy SS7 (HGA9). 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.

3.2 *Are all the policy requirements within HGA9 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.

3.3 *Is the site deliverable?*

Page 47 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Taylor Wimpey, is available for development and is a deliverable site. The Development Frameworks (SD.35) demonstrates how the site can be 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. HGA10 – New Herrington

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

Paragraph 6.562 (pgs. 201-203) of the Compliance Statement (SD.66) demonstrates how each of the above site constraints are capable of being mitigated, enabling acceptable site development. Where relevant, specific constraints are addressed in the Development Frameworks (SD.35) (Development Principles and Parameters) and as specific policy criteria in Policy SS7 (HGA10). 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.

4.2 Are all the policy requirements within HGA10 necessary and clear to the decision maker?

As a greenfield, urban 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.

4.3 Is the site deliverable?

Page 49 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by the New Herrington Working Men's Club owners, is available for development and is a deliverable site. The Development Frameworks (SD.35) demonstrates how the site can be 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. HGA11 – Philadelphia

5.1 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 site would be acceptable?

Paragraph 6.569 (pgs. 205-207) of the Compliance Statement (SD.66) demonstrates how each of the above site constraints are capable of being mitigated, enabling acceptable site development. Where relevant, specific constraints are addressed in the Development Frameworks (SD.35) (see Development Principles and Parameters) and as specific policy criteria in Policy SS7 (HGA11). 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.

5.2 Are all the policy requirements within HGA11 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.

5.3 Is the site deliverable?

Page 53 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Esh Developments, is available for development and is a deliverable site. The Development Frameworks (SD.35) demonstrates how the site can be 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).

6. Infrastructure

6.1 Will the infrastructure to support the scale of development proposed in The Coalfield villages 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 Planning Report (SD.62). These reports detail 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).

To demonstrate that the scale of development proposed on the allocated sites in the Coalfield is achievable, the developers of each of the 3 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 SS7 identifies specific requirements for each of the HGA sites, and these have been informed by the Development Frameworks (SD.35). Development proposals will be expected to contribute towards the delivery of “essential” infrastructure of priority need, 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 (SD.1; pg.118) in order to obtain planning contributions towards 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.

6.2 Are the adverse impacts of the Central Section of the Coalfield Regeneration Route capable of being mitigated?

The Compliance Statement (SD.66; paras.14.57-14.62, pg. 524) provides justification for the Central Route alignment to avoid impacting archaeological remains worthy of Scheduled Ancient Monument Status, proximity to the Leamside Line and contaminated ground conditions within the vicinity of the route.

At the detailed design stage, the road and any associated landscaping works will be designed to the latest standards to ensure any environmental impacts on the immediate area are minimised. An Environmental Impact Assessment will form an integral part of the process. This will ensure that improvements in the areas to be relieved of through traffic are also fully considered.

7. Delivery

7.1 Are the assumptions about the rate of delivery of houses from sites in The Coalfield realistic (anticipated delivery is shown in Appendices A, B, F and P of the SHLAA)?

The Council considers that the rate of delivery of houses from sites in the Coalfield 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 in line with the SHLAA methodology 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 will be taken into consideration and reflected in delivery forecasts 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 3 sites in the Coalfield area, HGA9 & HGA10 are identified to commence in the 6-10 year period of the Plan, and HGA11 in the 11-15 year period. Due to the different nature and sizes of the sites, varying delivery rates have been applied to the

Coalfield HGAs. The larger of the sites, HGA9 is expected to deliver 40 dwellings per annum as indicated by the developer Taylor Wimpey. HGA10 is expected to deliver 10 dwellings per annum for two years. HGA11 is expected to deliver 50 dwellings per annum until the site is developed out (it is expected that two developers will deliver housing on the site as a continuation of SHLAA site 330A).