

## **Sunderland City Council Response to Matters, Issues & Questions**

### **Matter 7 - The Strategy, Housing Growth Areas and Safeguarded Land for Washington**

#### ***1.2 Are policies SP3 and SS2 justified and effective?***

The Council considers that both policies are justified and effective, and this is explained in paragraphs 6.275-6.363 of the Compliance Statement (SD.66, pgs. 97-139). 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**

##### ***2.1 Do the Green Belt assessments support the HGAs and areas of Safeguarded Land in Washington and demonstrate exceptional circumstances for the removal of land from the Green Belt?***

Policies SP3, SS2 and SS3 are addressed in the Compliance Statement (SD.66, paras. 6.275-6.393, pgs. 97-149), and this demonstrates that the proposed allocation of HGAs within the Washington 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 6.376-6.391 of the Compliance Statement (SD.66, pgs.142-147) demonstrate that a logical Green Belt Review and site selection process has been undertaken (SD.29-34), which concludes that exceptional circumstances exist to safeguard land to the north of the city. It demonstrates that the safeguarded Land East of Washington could accommodate a sustainable community in the future but that a comprehensive approach would be required to address the infrastructure requirements and site constraints (paragraph 4.46 of the Plan - SD.1, pg. 42). Regarding the safeguarded Land South East of Springwell, the Council considers that the scale of development proposed by the developer is inappropriate at this time and that further consideration will be given to when, if it is deemed appropriate, to bring this site forward in the future as part of a Plan review.

##### ***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; pgs. 24-26), which explains this matter fully.

The Council has a proposed a modification in the updated Schedule of Main Modifications (MM9) which provides a summary of the exceptional circumstances for each of the sites.

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

Paragraphs 2.49 and 4.41 of the Plan (SD.1; pgs.19 and 38) confirm that limited development has taken place in and around Washington due to the tightly drawn Green Belt boundaries, and that without the Green Belt sites coming forward, only 778 homes (7% of city total) are identified in the SHLAA for development between 2018-33 (SD.22; para. 5.15; pg. 32). The scale of development proposed within the 6 HGA sites in Washington will provide 600 homes, however residential development overall in Washington will remain lower proportionately than elsewhere in the city. The scale of development proposed at Springwell Village, Rickleton, Fatfield and at Usworth is not considered to unduly alter the village/area character (SD.66; para. 6.294; pg. 101).

The justification for the HGA sites in Washington is explained in paragraphs 6.313-6.358 of the Compliance Statement (SD.66; pgs. 114-137) and for the Safeguarded Land sites in paragraphs 6.376-6.382 (SD.66, pgs.142-143). The reasons for not supporting larger Green Belt site allocations beside the above HGA sites is explained in the paragraphs listed above, and reasons for not supporting other Green Belt sites in Washington is explained in paragraphs 6.359-6.360 and 6.389 of the Compliance Statement (SD.66; pgs. 137-138 and 145).

***2.4 Is there any justification for the allocation of the safeguarded sites at this stage?***

The Council considers that there is no justification at this stage to allocate Land East of Washington, and this is explained in paragraphs 6.384-6.387 of the Compliance Statement (SD.66; pgs. 144-145).

With regards to the safeguarded Land South East of Springwell, the Council considers that the scale of development proposed by the developer is inappropriate at this time and that it would have a detrimental impact on the landscape and setting of the village, (SD.66; para. 6.388 and 6.302; pgs. 145 and 108).

**3. HGA1 South West Springwell**

***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 6.322 (pgs.116-118) 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 HGA1 - Development Principles and

Parameters) and as specific policy criteria in Policy SS2 (HGA1). 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 HGA1 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 (SD.8k). 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 29 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) 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. HGA2 – East Springwell**

### ***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 site would be acceptable?***

Paragraph 6.329 (pgs. 120-122) 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) (HGA2 -Development Principles and Parameters) and as specific policy criteria in Policy SS2 (HGA2). The Council has also carried out a 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 HGA2 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 (SD.8k). 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 27 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Story Homes, 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. HGA3 – North of High Usworth**

#### ***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 6.337 (pgs. 124-126) 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) (HGA3 - Development Principles and Parameters) and as specific policy criteria in Policy SS2 (HGA3). The Council has also carried out a 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 HGA3 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 (SD.8k). 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 31 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Barratt David Wilson Homes, 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. HGA4 – North of Usworth Hall**

### ***6.1 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 6.344 (pgs. 128-130) 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) (HGA4 - Development Principles and Parameters) and as specific policy criteria in Policy SS2 (HGA4). The Council has also carried out a 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.

### ***6.2 Are all the policy requirements within HGA4 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 (SD.8k). 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.

### ***6.3 Is the site deliverable?***

Page 33 of the Stage 3 Green Belt Site Selection Report (SD.31) states that the site is actively marketed by Story Homes, 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).

## **7. HGA5 - Fatfield**

### ***7.1 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 6.351 (pgs. 132-133) 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) (HGA5 - Development Principles and Parameters) and as specific policy criteria in Policy SS2 (HGA5). The Council has also carried out a 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.

### ***7.2 Are all the policy requirements within HGA5 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 (SD.8k). 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.

### ***7.3 Is the site deliverable?***

Page 37 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 HGA5 (PD3274) 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) 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).

## **8. HGA6 - Rickleton**

### ***8.1 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 6.358 (pgs. 135-137) 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) (HGA6 - Development Principles and Parameters) and as specific policy criteria in Policy SS2 (HGA6). The Council has also carried out a 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.

### ***8.2 Is the allocation appropriate in view of the need for a Playing Field Assessment?***

The Council considers the allocation to be 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 which 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 Council has a significant degree of confidence that the site will be deemed surplus to requirement at this point in time. This view has been informed by

projected use studies prepared as part of the funding bid for the Community Football Hubs. As part of this programme, 4 football clubs from within Washington will relocate to the Football Hub at Northern Area.

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. Therefore, this large, sustainable, highly marketable and deliverable site would remain surplus to requirements and unavailable for development throughout this Plan period and beyond.

It should also be noted that the Council has now signed a Statement of Common Ground with Sport England (EX1.011), which indicates that they are agreeable with the inclusion of the site within the Plan subject to the proposed modification to the Plan (MM8).

### ***8.3 Are all the policy requirements within HGA6 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 (SD.8k). 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.

### ***8.4 Is the site deliverable?***

Page 35 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 HGA6 (PD3274) 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 £40-£60k per unit. 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).



## **9. Infrastructure**

### ***9.1 Will the infrastructure to support the scale of development proposed in Washington 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 Washington is achievable, the developers of each of the 6 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 SS2 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.

## **10. Delivery**

### ***10.1 Are the assumptions about the rate of delivery of houses from sites in Washington realistic (anticipated delivery is shown in Appendices A, B, F and O of the SHLAA)?***

The Council considers that the rate of delivery of houses from sites in Washington 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 suitability, availability and achievability of sites has been assessed, and the constraints identified, the likely timetable and rate of development 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 (paragraph 4.61 of SHLAA (SD.22, pg. 23).

A cautious approach has been taken regarding the rate of delivery of the HGA sites. Of the 6 sites in Washington, none of these have been put forward in the 1-5 year category, despite the developers for sites HGA1-4 indicating that this was feasible. Sites HGA1-4 and HGA6 are identified to commence in the 6-10 year period of the Plan and site HGA5 in the 11-15 year period. A standard maximum build-out rate of 30 dwellings per annum has also been applied, although there is potential for faster build-out in Washington, and Story Homes has indicated that 40 dwellings per annum is anticipated at HGA2 (PD5598).