

**Sunderland Core Strategy and Development Plan (2015- 2033)**  
**Matter 7: The Strategy, Housing Growth Areas and Safeguarded Land for Washington**

**Representor number: 1175997**



**Issue 1: Strategic Policies**

1.2 Are Policies SP3 and SS2 justified and effective?

Homes England are of the view that Policy SP3 is not justified as it does not represent the most appropriate strategy based upon the reasonable alternatives available. Notwithstanding the fact that Washington is capable of accommodating a greater proportion of Sunderland's housing growth than is put forward in the Plan, the proposed strategy for Washington relies too heavily upon the delivery of a limited number of smaller and widely dispersed sites to meet the housing growth needs of Washington, and Sunderland more generally, particularly given the scale of employment growth proposed at IAMP.

The justification of Policy SP3 could however be rectified by deploying a slightly revised strategy in which the Land East of Washington is allocated for development within the plan period to align housing growth with employment growth at IAMP, as opposed to being safeguarded to meet longer term development needs. This would allow the Washington HGAs to either be retained to support a more appropriate level of growth within Washington; safeguarded for future release, held in reserve in order to build responsiveness into the Plan, or be retained as part of the Green Belt.

The effectiveness of the policy approach is also brought into question in view of the fact that South Tyneside Council have acknowledged that they are currently unable to accommodate their housing growth needs within their own administrative area. As South Tyneside is in the process of developing a Local Plan, which is expected to require Green Belt releases to meet local housing needs, the allocation of the Land East of Washington would ensure that housing growth associated with IAMP, which straddles the boundary of Sunderland and South Tyneside, can be accommodated without exacerbating housing land availability issues in South Tyneside until such time that a new plan for South Tyneside is adopted. This approach will minimise the need for wider Green Belt deletions and facilitate a co-ordinated approach to co-ordinating the distribution of housing and employment growth.

The Land East of Washington should be allocated as a Housing Growth Area to ensure that the full benefits of the strategic release of Green Belt sites through the IAMP AAP, and this Plan are captured and to ensure that housing needs in Washington, Sunderland and the surrounding area can be met in conjunction with responding to the significant employment growth proposed.

**Issue 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?

The land currently identified to be safeguarded at Land East of Washington has a very strong justification for release in terms of both the qualitative assessment of its continued function as part of the Green Belt, and in terms of housing need, housing land supply, spatial distribution of housing

land and economic growth aspirations. As noted at paragraph 4.28 of the Review of the Sunderland Green Belt: Part 2 - Boundary Assessment and recommendations (SD.34):

*“The effect of removing the IAMP site from the Green Belt is that there is an area of land to the immediate west of the site which will arguably perform a more limited Green Belt Function than was previously the case prior to the allocation of the IAMP in the adopted IAMP AAP”.*

Paragraph 4.29 continues:

*“The proposed Safeguarded Land is well contained between existing build development to the west and south, and the boundary of the IAMP site to the east. The removal of part or all of this land from the Green Belt therefore appears to be a logical step in the context of the wider strategic release of Green Belt in this location. This area is well placed to meet potential future development needs in the northern part of the city, and will assist in ensuring the permanence of the Green Belt Boundary in accordance with the NPPF”.*

As such, it should be noted that the site has been identified as being appropriate for release from the Green Belt boundary on a qualitative basis with the decision to safeguard the site being a strategic one, the Council’s preference being for a number of dispersed Green Belt releases across the northern part of the City. Homes England are strongly of the view that a more appropriate strategy would be to focus housing growth on Washington due to:

- 1) its existing and expanding employment base;
- 2) good accessibility
- 3) latent demand due to Green Belt constraints
- 4) limited availability of brownfield housing sites, and
- 5) less constrained infrastructure.

The Land East of Washington is particularly well placed to respond to these issues due to its location adjacent to the existing settlement to the west and a major employment centre to the south and east. Furthermore, the site should be considered preferable to the proposed HGAs by virtue of its size being large enough to deliver services and facilities for residents on site and enhance provision for existing residents in the area. As such, it is considered entirely justified that this site be released from the Green Belt for development through this review of the Local Plan.

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

Although Policy SP3 and the accompanying key diagram at figure 15 of the submitted plan seek to explain and illustrate the strategic context of the proposals for the Washington sub-area, the rationale for the Land East of Washington being released from the Green Belt is not clearly presented with regard to the impact of land released through the adopted IAMP AAP on the surrounding Green Belt. Further description of this context would help to illustrate both the qualitative rationale for the site being released and explain the strategic context of the Council’s aspiration for the site to be developed as a sustainable community.

As such, in addition to being reclassified as a HGA, additional supporting text outlining this qualitative Green Belt and strategic rationale should be included as part of the text after Policy SS3 – Safeguarded Land.

2.3 Are the configuration and scale of the HGAs and areas of Safeguarded Land justified taking into account development needs

To ensure that a selection of sites are available to respond to changing circumstances, a more flexible and responsive approach would be to allocate the land East of Washington and instead safeguard an appropriate selection of HGA sites to meet longer term development needs. Alternatively, the HGA sites could be removed from the Green Belt and held in reserve with policies stipulating the circumstances in which they can come forward. This approach would provide maximum flexibility in ensuring housing needs are met during, and beyond, the plan period.

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

With regards to the Land East of Washington, there is a strong justification for the site to be released from the Green Belt due to its negligible contribution to the openness of the Green Belt and in view of the long term housing need, housing land supply, spatial distribution of housing land and economic growth aspirations of the plan.

Furthermore, Homes England are of the view that there is a strong justification for this site to be allocated, either in full or in part for development within the forthcoming plan period, as opposed to being safeguarded to meet longer terms development needs. As expressed elsewhere in this statement, such an allocation would ensure that the plan has sufficient flexibility to maintain delivery in varying market conditions; ensure that a more appropriate level of housing growth is directed towards Washington in view of its sustainability; and also ensure that the full economic benefits of a co-ordinated housing and employment growth strategy are realised.

**Issue 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? The Council has clarified that the site promoter owns neighbouring land to facilitate access routes.

No comments.

3.2 Are all the policy requirements within HGA1 necessary and clear to the decision maker?

No comments.

3.3 Is the site deliverable?

No comments.

**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?

No comments.

4.2 Are all the policy requirements within HGA2 necessary and clear to the decision maker?

No comments.

4.3 Is the site deliverable?

No comments.

### **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?

No comments.

5.2 Are all the policy requirements within HGA3 necessary and clear to the decision maker?

No comments.

5.3 Is the site deliverable?

No comments.

### **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?

No comments.

6.2 Are all the policy requirements within HGA4 necessary and clear to the decision maker?

No comments.

6.3 Is the site deliverable?

No comments.

### **7. HGA5 – Fatfield**

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?

No comments.

6.2 Are all the policy requirements within HGA5 necessary and clear to the decision maker? 6.3 Is the site deliverable?

No comments.

### **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?

No comments.

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

No comments.

8.3 Are all the policy requirements within HGA6 necessary and clear to the decision maker?

No comments.

8.4 Is the site deliverable?

No comments.

## **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?

No comments.

## **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)?

No comments.