

Miller Homes response to the Sunderland Core Strategy and Development Plan Examination

Inspector's Matter, Issues and Questions

ID Number: 497082

Hedley Planning Services are instructed by Miller Homes in support of Land at New Herrington, Sunderland. The site was considered in the *Green Belt Assessment Stage 1 Updated and Stage 2 (2017)* (SD.30) as Site Ref. H03 and within the *Strategic Housing Land Availability Assessment (2018)* (SD.22) as part of Site Ref. 466. We respond to each question using the Inspector's references:

## Matter 2

### Spatial Strategy and Related Policies

*The matter considers whether the strategy for the distribution of development is justified and whether related strategic policies are positively prepared, effective and consistent with national policy.*

#### Issues

#### **3. Green Belt and Exceptional Circumstances (Green Belt alterations will also be discussed in relation to Housing Growth Areas during Week 2)**

*3.1. Has, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?*

The exceptional circumstances, as set out in the *Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt* (SD.33), is supported.

It is considered that the conclusions of the both the Green Belt assessment and the exceptional circumstances are equally applicable to the Land at New Herrington, Site Ref. H03.

*3.2 Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities?*

Yes, but it is considered that the conclusions of the both the Green Belt assessment and the exceptional circumstances are equally applicable to the Land at New Herrington, Site Ref. H03.



Figure 1 - Site Ref. HO3 - extract from Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)

It is considered that the Council has failed to properly assess Site Ref. HO3. This is because the site was not considered in isolation during Stage 2 of the Green Belt Assessment (SD.30), but instead was considered as part of a larger site (in combination with Site Ref. HO8) and therefore ‘Discounted’.

The conclusion of Stage 1 confirms that site HO3 performs as well, if not better, than the allocated sites:

Criteria	HO1 (HGA10)	HO3	HO11 (Part of HGA11)	HO12 (Part of HGA11)	HE8 (Part of HGA9)	HE9 (Part of HGA9)	HO3 / HO8 (SHLAA Ref. 466)
1	A	D	D	D	C	C	E
2	A	B	C	D	C	B	D
3	A	C	C	D	D	D	E
4	A	A	C	B	A	A	A
5	A	C	C	D	C	C	D

Table 1 – Summary of Stage 1 Assessments using assessments from SD.30 compared with Stage 2 assessment of site HO3/HO8 (SHLAA Ref. 466)

As the Stage 2 Assessment considered Ref. HO3 and HO8 in combination (SHLAA Ref. 466) and the appraisal concluded that the site should be discounted. It is considered that this is a fundamental flaw in the Green Belt assessment, which has resulted in a suitable site being discounted.

To be found sound the Land at New Herrington should be allocated for residential development to help deliver the policy requirements of SP6 and SS7.

#### **4. The principle of safeguarded land being identified to meet longer-term development needs (Green Belt alterations will also be discussed in relation to Safeguarded Land during Week 2)**

*4.1 Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs?*

Miller Homes support the principle of the proposed allocation of Safeguarded Land, as set out in Policy SS3. However, there is a concern that if land needs to be brought forward to address a lack of a five year housing land supply, a large site is not the best way of quickly delivering needed homes.

A more dispersed strategy, including sites within The Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfields.

*4.2 Has enough land been proposed for safeguarding to meet longer-term development needs?*

No, additional sites, including sites within The Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfield. This will ensure that the Plan accords with paragraph 83 of the NPPF (2012) and ensure that the Green Belt boundaries “endure beyond the plan period”.

*4.3 In general terms is the safeguarded land in the right place to meet longer-term development needs?*

No, a more dispersed strategy, including sites within The Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfield.

#### **6. Whether Policy NE8 is consistent with national policy.**

*6.1 Is Policy NE8 consistent with paragraphs 17 and 109 of the Framework?*

Miller Homes do not wish to comment in relation to this question, at this time.

*6.2 Is the Plan clear as to areas of ‘valued landscape’ and are these areas justified?*

Miller Homes do not wish to comment in relation to this question, at this time.

*6.3 Should Policy NE8 allow for development sustainably located on the edge of settlements, particularly where there is a lack of a 5 year housing land supply?*

Yes, to ensure flexibility policy NE8 should allow for sustainably located development to come forward, especially where there is a lack of a five year housing land supply.

However, given the significant amount of Green Belt this flexibility will be difficult to achieve without additional safeguarded sites being identified. A more dispersed strategy, including sites within The

Coalfield, is considered to be a better way of delivering flexibility of supply. It is considered that the identification of Land at New Herrington, Site Ref. HO3 as safeguarded land would be appropriate to meet the longer-term development needs of The Coalfield. This will ensure that the Plan accords with paragraph 83 of the NPPF (2012) and ensure that the Green Belt boundaries “endure beyond the plan period”.