

Sunderland Local Plan Examination

Burdon Lane Consortium - Burdon Lane

Matter Statement 7 - Strategies and Allocations for South Sunderland

Issued May 2019

1.0 Strategic Policies

(1.2) Is Policy SP5 justified and effective?

- 1.1 We respond to Matter 7 on behalf of the Burdon Lane Consortium (consisting of Taylor Wimpey, Persimmon Homes and Story Homes) (“our Client”).
- 1.2 Our Client supports Policy SP5 which states that:
- “South Sunderland will continue to grow and become a spatial priority for housing and economic development [and the] South Sunderland Growth Area is allocated as a new sustainable community”.*
- 1.3 Paragraph 4.52 in the supporting text recognises that South Sunderland is the most populated sub area of the city. It has the largest proportion of existing housing stock and has a strong relationship with the city centre. South Sunderland is a popular residential area (Core Strategy and Development Plan (CSDP) paragraph 2.15) and it represents a sustainable and desirable area to deliver new homes.
- 1.4 The South Sunderland Growth Area (SSGA) has long been established as a suitable location for development and it represents a key part of the CSDP’s housing strategy. The SSGA, made up of four sites, provides an opportunity to provide a new sustainable community comprised of residential-led with provision of new community services and facilities. This approach aligns with NPPF (2012) paragraph 52 which explains that *“The supply of new homes can sometimes be best achieved through planning for larger scale development”.*
- 1.5 Accordingly, our Client considers that Policy SP5 is justified and effective.

2.0 Port of Sunderland

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

- 2.1 The Burdon Lane Consortium does not wish to comment.

3.0 Identification of Sites and Protected Areas

(3.1) Does the SHLAA support the SSGA?

- 3.1 The SSGA is comprised of four sites which are assessed independently in the SHLAA. The table below summarises each site along with its anticipated yield and the number of dwellings to be

delivered within and beyond the plan period, using the figures contained in the Appendix A (Schedule of Deliverable and Developable Sites) of the SHLAA.

Site	SHLAA Ref	Anticipated Yield	Yield (2018-2023)	Yield (2023-2028)	Yield (2028-2033)	Yield 2033+
Chapelgarth	081	750	120	230	250	150
Land North of Burdon Road	477	955	45	285	325	300
Cherry Knowle	062	800	150	250	250	150
South Ryhope	462A	450	80	150	150	70
Total		2,955	395	915	975	670

3.2 In relation to its site at Land North of Burdon Road, our Client considers that the assumptions in the SHLAA are reasonable and realistic. The number of dwellings which are anticipated to be delivered in the plan period (to 2033) equals 2,285 (395+915+975), as presented in the SHLAA is also consistent with the figure referenced in CSDP paragraph 4.61.

3.3 Accordingly, our Client considers that the SHLAA supports the SSGA.

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

3.4 The principle of the SSGA is long standing with the majority of the parcels forming residential/employment allocations in the UDP. This demonstrates that the site is considered to be a suitable location for development.

3.5 The SSGA is identified for the delivery of approximately 3,000 dwellings which comprises 22% of the amount of new homes needed (as identified in Policy SP1). Therefore the SSGA forms a key part of the CSDP’s housing strategy.

3.6 The SSGA has been identified by the Council as an opportunity to deliver a comprehensively planned new community; the principle of which aligns with NPPF (2012) paragraph 52 which explains that *“The supply of new homes can sometimes be best achieved through planning for larger scale development”*.

3.7 The individual sites which comprise the SSGA have each been assessed independently in the SHLAA as being deliverable and developable. Our client supports this assessment in relation to its site (Land North of Burdon Lane).

3.8 As detailed in the response to Question 4.1, detailed technical assessments have been undertaken to understand the site constraints and there are no known technical or other reasons which would preclude the site from development.

(3.3) Is the configuration of the settlement breaks justified?

3.9 The Burdon Lane Consortium does not wish to comment.

4.0 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?

4.1 The Burdon Lane Consortium is currently preparing a planning application which is anticipated to be submitted imminently. Therefore, a full project team has been instructed and detailed technical assessments of the site (Land North of Burdon Lane) have been undertaken to understand the site constraints and opportunities.

Transport

4.2 WYG has prepared a Transport Assessment which has been undertaken in accordance with the Guidelines for Environmental Impact Assessment (IEMA, 2004). The scope of the Transport Assessment has also been issued to and discussed with both the Council and Highways England. It assesses the construction traffic (during the construction stage); parking requirements; delay/network capacity / traffic accidents at nearby junctions.

4.3 This assessment has also influenced the masterplan for the site which will include the provision of a new link road and roundabout. It will also include for public transport (including a bus link and infrastructure), pedestrian and cycle connections to the external network. Other proposed mitigation measures will help to mitigate the transport impacts of the proposed development.

4.4 With appropriate mitigation measures in place, it is assessed that the scheme will not have any significant effects on the highway network.

Ecology and Nature Conservation

4.5 BSG Ecology has assessed the ecological issues and potential impacts that could occur within the environments associated with the proposed development, and also within the context of the surrounding area. This work has comprised a Preliminary Ecology Appraisal followed by a series of subsequent surveys to assess the impact of the development on protected species.

4.6 The surveys confirm that the range of habitats within the site is relatively limited given the site mainly consists of arable and semi-improved grassland fields. Habitats are largely limited to field boundaries which are bordered by species-poor hedgerows and occasional areas of scrub and scattered trees.

4.7 Whilst the recording of notable species on the site was limited, BSG Ecology has outlined mitigation measures to limit the impact of the development and which could result in biodiversity net gains. These measures include retention of hedgerows and mature trees where possible; incorporating a green corridor through the centre of the site and providing a substantial area of natural green space including Suitable Alternative Natural Greenspace (SANG).

Landscape and Visual Impact

4.8 A Landscape and Visual Impact Assessment has been undertaken by Southern Green Landscape Architects which considers the individual components on (i) the character and quality of the existing landscape of the site and its immediate surrounding; and ii) key views and visual amenity.

- 4.9 Whilst the development would change the nature of the site from that of farmland to one of residential in character, the effects on visual receptors at a greater distance are anticipated to be limited due to the rolling topography of the site and existing vegetation within it, and the study area. It is also likely that there will only be a minimal number of more sensitive visual receptors – limited to nearby existing residential streets.
- 4.10 The impact of the development would be limited by incorporating mitigation measures including the retention of existing vegetation where practicable; creating new hedgerows and landscape buffers around the perimeter of the site, providing green links through the development and directing development to the lower and less visible parts of the site.

Archaeology and Heritage

- 4.11 Durham University Archaeological Services has undertaken an Archaeological Desk-based assessment, Geophysical Survey and a scheme of Evaluation Trenching which has allowed the project team to understand any below ground constraints.
- 4.12 The assessment has identified sub-surface remains of ridge and furrow across much of the site which is considered to be of negligible value. A network of enclosures are also found to be present on the site reflecting phases on settlement during the later prehistoric and Roman periods. Following discussions with the Tyne and Wear Archaeology Officer, it has been agreed that any impact on this resource could be mitigated by an appropriately phased programme of archaeological excavation, analysis of the results, and its subsequent dissemination.
- 4.13 In terms of above ground heritage assets, there are no designated historic assets on the site, and it is not in or adjacent to a Conservation Area. There will also be no significant impact on the setting of listed buildings in the nearby area because of the lack of intervisibility with the site.

Drainage

- 4.14 A review of the Environment Agency's website confirms that the site is located within Flood Zone 1 and therefore it has less than 0.1% chance of flooding within any year. Queensberry Design has completed a Flood Risk Assessment and Drainage Strategy for the site which will ensure foul and surface water is managed. The proposed development will include a Sustainable Drainage System (SuDS) comprised of a series of open drainage ditches or swales along the boundary of the site acting as collection and interception points for transmitting surface water to drainage basins before discharging offsite at rates no greater than existing.

Summary

- 4.15 The technical assessments have allowed the project team to understand the potential site constraints. It is clear that there are no constraints which preclude the site from development.

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

- 4.16 Our Client considers that Policy SS6 would benefit from amendments to provide clarity to both applicants and decision makers.
- 4.17 To ensure the policy requirements are clear, we suggest the following amendments to Policy SS6:

Strategic Site Policy

SS6 South Sunderland growth area

Sites within SSGA include Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. These sites are allocated to create a new high quality, vibrant and distinctive neighbourhood.

Development should deliver:

1. approximately 3000 new homes to be broadly distributed across the four sites as follows:

i. Chapelgarth – approximately 750 homes

ii. Land North of Burdon Lane – approximately 1,000 homes

iii. Cherry Knowle – approximately 800 homes

iv. South Ryhope – approximately 450 homes;

2. 10% affordable housing subject to viability;

3. a new 1.5 form entry primary school and provide contributions towards the extensions to two existing schools where justified;

4. a local centre to be created as part of the development on Land North of Burdon Lane to provide a focal point within the SSGA and complement nearby existing centres. The local centre should comprise no more than 500sqm (gross external area) of A Use Classes to fall within the thresholds defined in Policy VC2. In addition, the local centre should include the 1.5 form entry primary school and provide areas for play, sport and leisure;

5. smaller areas of retail provision and/or community/cultural facilities should be provided across the developments at Chapelgarth, Cherry Knowle and South Ryhope;

6. areas of Suitable Alternative Natural Greenspace (SANGS) (to include areas of open space/greenspace) to divert recreational activity and dog walking away from the coast. - expanses of public open space;

7. appropriate compensatory planting of Green Infrastructure where any loss of existing trees/hedgerows are necessary to accommodate development. Existing vegetation and green links should be retained and incorporated into the development where practical~~woodlands~~;

8. cycleways and footpaths to encourage sustainable methods of travel; and

9. contributions (in the absence of any other sources of funding) to support the completion of the Ryhope-Doxford Link Road

4.18 The above amendments would provide further clarity on the requirements for the SSGA and for each of the four sites.

4.19 Paragraph 4.62 in the supporting text states that “the council is preparing the South Sunderland Supplementary Planning Document. Once adopted, all development on the SSGA should be in accordance with this document”. Our Client has submitted representations to a consultation on the draft SSGA SPD in October 2017; however, the SSGA SPD has not been subject to any further revisions or further consultation.

4.20 Whilst our Client agrees that some of the finer grain detail can be reserved for inclusion in the SPD, it is imperative further consultation is undertaken on an updated version which takes account of the representations submitted previously. Given that the SSGA is likely to come

forward over a period of around 15 years, it also essential that it allows flexibility for the delivery of the site. Accordingly, we suggest the following revision to the final sentence in CSDP paragraph 4.62:

“Once adopted, all development on the SSGA should be in general accordance with this document”

- 4.21 With the above changes to Policy SS6 and the supporting text, our Client considers that this would provide the appropriate balance between providing clear requirements and sufficient flexibility.

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

- 4.22 The requirement for 10% of homes to be affordable is detailed in the South Sunderland Growth Area SPD (page 59) which also indicates a tenure split of 75% social rented and 25% intermediate.
- 4.23 The Burdon Lane Consortium broadly welcomes the recognition by the Council that 10% affordable housing should be provided at the SSGA, rather than 15% as required elsewhere. This reflects the significant infrastructure requirements and costs in the SSGA and is the agreed affordable housing requirement for the planning permissions for Chapelgarth, Cherry Knowle and South Ryhope.
- 4.24 Our Client supports the recognition on page 10 of the Planning Obligations SPD that if there are viability issues, as demonstrated through a viability assessment, that consideration will be given in the first instance to reviewing the tenure split on a sliding scale and then reducing the percentage of affordable housing to a percentage that is viable.

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

- 4.25 A draft Supplementary Planning Document (SPD) has been prepared for the SSGA which contains further context and information. The preparation of this however pre-dates the CSDP and it has not been formally tested. Our Client has submitted representations to a consultation on the draft SSGA SPD in October 2017; however, the SSGA SPD has not been subject to any further revisions or further consultation. Although our Client broadly supports the draft SPD, it is considered that it is overly prescriptive and does not take into account issues of viability and deliverability.
- 4.26 Paragraph 4.62 in the supporting text states that *“the council is preparing the South Sunderland Supplementary Planning Document. Once adopted, all development on the SSGA should be in accordance with this document”*.
- 4.27 Whilst our Client agrees that some of the finer grain detail can be reserved for inclusion in the SPD, it is imperative further consultation is undertaken on an updated version which takes account of the representations submitted previously.
- 4.28 Given that the SSGA is likely to come forward over a period of around 15 years, it also essential that it allows flexibility for the delivery of the site. Accordingly, we suggest the following revision to the final sentence in CSDP paragraph 4.62:

“Once adopted, all development on the SSGA should be in general accordance with this document”

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

- 4.29 The SSGA is comprised by the following four sites: Chaplegarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope, as confirmed in Policy SS6 and as shown on Figure 28. Policy SS6 identifies the SSGA for the delivery of approximately 3,000 new homes.
- 4.30 Of these sites, Chaplegarth, Cherry Knowle and South Ryhope have planning permission for a total of 2,000 dwellings. This leaves approximately 1,000 dwellings for the Land North of Burdon Lane which is being brought forward by the Burdon Lane Consortium. A planning application (ref. 18/00640/FUL) was submitted by Persimmon Homes for a relatively small parcel to the east of Burdon Road which has yet to be determined by the Council. Our Client is currently preparing a planning application for the remaining part of the site and anticipates that this will be submitted imminently.

(4.6) Are the sites deliverable?

- 4.31 Land North of Burdon Lane is suitable for development, is available for development now, and is achievable. The site has the benefit of three end developers (Taylor Wimpey, Persimmon and Story Homes) who have been actively promoting the site for a number of years. This will provide multiple delivery outlets and ensure the site delivers new homes to meet the housing need.

5.0 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?**

- 5.1 Strategic Priority 13 of the CSDP is to *'ensure that the city has the infrastructure in place to support its future growth and prosperity.'* and this will be delivered by policies *'ID1 Delivering Infrastructure'* and *'ID2 Planning Obligations'*. The CSDP is supported by the Infrastructure Delivery Plan (IDP) (SD.59) which sets out the infrastructure requirements associated with the development planned through the CSDP and discusses how planned provision will be delivered.
- 5.2 The IDP is informed by infrastructure providers and sets out the infrastructure projects needed to deliver the CSDP. The IDP considers the level of growth planned for the City and it includes section on the SSGA. Reference is also made to the Infrastructure Delivery Study for the SSGA.
- 5.3 As stated in the IDP (paragraph 3.15) due to the scale of development, there is a need to ensure provision of the supporting infrastructure which is essential to the creation of sustainable communities. The phasing of which will be considered and discussed with the Council and submitted as part of the planning application.
- 5.4 Further information regarding the requirements and associated solutions for specific types of infrastructure is provided in the evidence base which support the CSDP. Of particular relevance are:
- Sunderland Green Infrastructure Strategy (2018) (SD.46);
 - Greenspace Audit and Report (2018) (SD.47);
 - Sunderland Local Plan – Initial Assessment of Transport Impacts and the two subsequent addendums (2017-18) (SD.51, SD.52 and SD.53); and

- Local Plan Education Planning Report (2018) (SD.62).

5.5 The CSDP is also supported by a series of Statements of Common Ground between the Council and Infrastructure providers. These, together with the evidence documents described above, provide assurances that, through continued joint working between the Council and providers, the necessary infrastructure will be provided in a timely fashion.

6.0 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)?

6.1 The SHLAA includes a delivery schedule at Appendix A for the Deliverable and Developable Sites which has been identified. Our Client's site, Land north of Burdon Road (SHLAA ref. 477), is identified for the delivery of 955 dwellings with:

- 45 dwellings to be delivered in years 1 to 5 (2018-2023)
- 285 dwellings to be delivered in years 6 to 10 (2023-2028)
- 325 dwellings to be delivered in years 11 to 15 (2028-2033)
- 300 dwellings to be delivering in 15 years+

6.2 Whilst our Client is satisfied that these delivery rates are realistic, given the 3 end house builders there is a possibility that the output could be increased during the plan period.