

Sunderland Local Plan Examination

Taylor Wimpey - Penshaw

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

Issued May 2019

1.0 Strategic Policies

(1.1) Are policies SP6 and SS7 justified and effective?

Policy SP6 – The Coalfield

- 1.1 In respect of its land interest at Penshaw (HGA9), Taylor Wimpey supports the Council's approach to the release of land from the Green Belt in the Coalfield sub-area for residential development.
- 1.2 Paragraph 4.24 explains that some parts of the city are less constrained by Green Belt. Whilst Taylor Wimpey supports the distribution of housing in such locations, it is recognised that focussing all of the housing need in these areas could have implications on infrastructure and the environment. Taylor Wimpey therefore supports the proposed strategy which seeks to rebalance the distribution across the sub areas to ensure the needs of the entire city are met.
- 1.3 The current Green Belt boundary constrains development around settlements in The Coalfield sub area including Penshaw and Houghton-le-Spring. Taylor Wimpey agrees that there is limited capacity within the Existing Urban Area and that amendments to the Green Belt are required to deliver the housing requirement and the strategy to allow for sustainable development across the city.
- 1.4 Policy SP6(2) details the Housing Growth Areas which includes Taylor Wimpey's land interests at Penshaw (HGA9). Taylor Wimpey supports Policy SP6 and the approach to Green Belt release and allocation of HGA9 in the Coalfield sub-area.

Policy SS7 – The Coalfield Housing Growth Areas

- 1.5 Policy SS7 appears to be consistent with the equivalent overarching policies for the housing growth areas in the other sub-areas. Taylor Wimpey broadly supports Policy SS7 but offers the following comments in response to each of the sub points.
- 1.6 SS7(1) states that development should “*provide a mix of housing types with a focus on family homes*”. Whilst this appears to be a reasonable requirement, it is currently unclear whether this aligns entirely with the requirements in Policies H1 (Housing Mix) and H2 (Affordable Homes). For example, Policy H1 in particular encourages the provision of “*larger, detached dwellings*” which is supported to vary the existing housing stock and support economic growth initiatives. However, it is unclear whether this is the same as requiring a focus on family homes.

- 1.7 SS7(2) states that development should “*address impacts and make provision or contributions towards education provision and healthcare*”. This should be linked to the planning obligation tests set out in paragraph 56 of the NPPF. Accordingly, we request the following amendment:
“2. address impacts and make provision or contributions towards education provision and healthcare where justified and necessary.”
- 1.8 SS7(3) states that development should “*enhance access to local facilities and services and*”. As currently drafted, the requirements upon the applicant are not clear.
“3. enhance access to local facilities and services where appropriate and.”
- 1.9 To ensure Policy SS7 is justified and consistent with national policy, we request the following revisions to SS7 sub points 2 and 3.
“2. address impacts and make provision or contributions towards education provision and healthcare where justified and necessary.”
“3. development should enhance access to local facilities and services where appropriate and.”
- 1.10 With the suggested minor amendments Taylor Wimpey considers that Policy SS7 is justified and effective.

2.0 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?

- 2.1 The Council’s suite of evidence relating to the Green Belt comprises the following reports:
- Green Belt Review Stage 1 – Core Strategy Growth Options Stage (2016) (SD.29);
 - Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30);
 - Green Belt Site Selection Report (2017) (SD.31);
 - Green Belt Assessment 2018 Addendum (2018) (SD.32);
 - Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (2018) (SD.33); and
 - Review of the Sunderland Green Belt Part 2: Boundary Assessment and Recommendations (2018) (SD.34).
- 2.2 Together these reports provide an iterative approach to the selection of sites for release from the Green Belt for housing development. The Green Belt Site Selection Report (2017), which provides the third stage of assessment identifies 15 sites proposed as Housing Release Sites. This includes land at Penshaw which was assessed under parcel reference 465.
- 2.3 The Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (2018) report provides an assessment of whether there are exceptional circumstances which justify amending the Green Belt boundary within Sunderland City Council’s administrative area. The report concludes that exceptional circumstances do exist that justify the removal of some land from the Green Belt in SCC’s administrative area.
- 2.4 The exceptional circumstances relate to the housing need and land supply as well as the spatial distribution of housing land, and the need to support economic growth. The recognised

imbalance in the spatial distribution of identified housing land supply is particularly relevant to the justification for releasing the HGAs in the northern part of the City which is highly constrained by the existing Green Belt boundary. The report finds that the lack of identified housing land supply in the north of the city compared to the southern part of the city (which is not constrained by Green Belt), is leading to an over-concentration of supply in one location and pressure on local infrastructure and environmental impacts.

- 2.5 Taylor Wimpey therefore considers that the Council's evidence base relating to the Green Belt provides robust support for the Housing Growth Areas, and positively demonstrates exceptional circumstances for the removal of land from the Green Belt.

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

- 2.6 The exceptional circumstances which justify the removal of land from the Green Belt are set out in the Spatial Strategy (section 4 of the CSDP), and paragraphs 4.14 – 4.28 are of particular relevance.
- 2.7 Paragraph 4.28 of the CSDP also explains that without alterations to the Green Belt boundaries, the Plan would not be able to accommodate housing needs. As explained in paragraph 4.24, the CSDP has sought to rebalance the distribution of housing growth as it would not be appropriate to direct the majority of the housing growth to a small area of the city. It is also evident that the Green Belt boundary severely constrains housing growth in certain areas of the city.
- 2.8 It is clear that the Existing Urban Area is unable to accommodate all housing growth and it would also not be appropriate to direct all growth to non-Green Belt locations as this is likely to have implications on existing infrastructure and the environment.
- 2.9 The CSDP evidence base includes an *Exceptional Circumstances for Releasing Land from the Green Belt* report, prepared by Peter Brett Associates (June 2018). The report concludes that the housing need; housing land supply; spatial distribution of housing land; and the need to support economic growth are exceptional circumstances to justify alterations to the Green Belt.
- 2.10 The report also states that “*it is clear that the identified housing targets and strategic corporate objectives cannot be achieved without the release of greenfield sites in the Green Belt locations*”.
- 2.11 Taylor Wimpey considers that the amendments to the Green Belt boundary are essential in order to deliver the spatial strategy and that exceptional circumstances have been demonstrated. The approach to amend the Green Belt to allow sustainable growth of existing communities and also accords with NPPF 2012 paragraph 84 which states that when “*reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*”.
- 2.12 Taylor Wimpey consider that the exceptional circumstances have been clearly articulated within the Plan, detailed in the evidence base document Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (2018).

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

- 2.13 Whilst Taylor Wimpey considers the configuration and scale of the Housing Growth Areas to be justified, as identified in representations to the CSDP Publication Draft in July 2018, the south

eastern boundary of the site at Penshaw (Policy HGA9) does not appear to be consistent with any landscape features or field boundaries. Taylor Wimpey suggests that the boundary could be amended to ensure it is defined using a physical feature which is readily recognisable as per the requirements of NPPF (2012) paragraph 85.

(2.4) Are the configurations of the settlement breaks justified?

- 2.14 Taylor Wimpey has no comments on the proposed Settlement Breaks in relation to its site at Penshaw.

3.0 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?

- 3.1 Taylor Wimpey supports the Council's assessment that any constraints to development can be mitigated so that the development of the site would be acceptable.
- 3.2 The Council's SHLAA (2018) (site ref. 465) and Development Frameworks document (2018) identifies a number of site constraints and opportunities. The submitted technical assessments provides detailed responses although we have also sought to highlight the key issues below and provide clarity on the status of the constraints identified in the Development Frameworks document and the SHLAA, alongside an analysis of the suitability of the site in other technical areas.

Heritage and Archaeology

- 3.3 A Heritage Appraisal has been prepared by Lichfields to consider the potential impact of the site allocation on Penshaw Monument and its setting. The appraisal considers that the transformative nature of the country park does not reflect the historic landscape character and, as such, the site does not make a material consideration to the setting of significance of the listed building. The appraisal also concludes that the Penshaw Monument is sufficiently elevated and that the proposed development will not impede views from the surrounding area. It is recommended though that the development should seek to retain key views through the site towards Penshaw Monument.
- 3.4 In terms of archaeology, Durham University Archaeological Services has undertaken a review of the below ground heritage considerations. No archaeological deposits have been identified which require preservation in situ. The presence of prehistoric activity in the surrounding vicinity however justifies the requirement to investigate this further prior to the submission of a planning application.

Landscape and Visual Appraisal

- 3.5 A landscape and Visual Appraisal (LVA) has been produced by DP Landscape Architects to provide technical landscape evidence to support the allocation of the site in the CDSP.
- 3.6 The LVA states that development of the site for housing will have a relatively low impact on the landscape character as it is principally an urban fringe in character. Although settlement interspersed with agricultural land is also characteristic, the site sits on the edge of a settlement so its change from agricultural use would have relatively little effect.

- 3.7 Views into the side from the highest points in Herrington Country Park are partially screened by recent woodland planting within the park, it is likely that, as the planting matures, the proposed development would be effectively screened.
- 3.8 The existing hedgerow to the south west would largely screen views of new development from Chislehurst Road. There is also an existing hedgerow along the northern boundary adjacent to Chester Road which allows only intermittent views of the site through gaps in the hedgerow. The visual impact here is low.
- 3.9 Impacts on landscape character would be relatively low as new housing would sit within the urban fringe. The visual impacts are greatest on the receptors looking south from Penshaw Monument, although the site is distant and the impact on views from housing would be greatest on Chester Road. To mitigate the effects of the development the proposal incorporates substantial green infrastructure.
- 3.10 Herrington Country Park also provides a robust settlement boundary and could provide a more natural and positive edge to the Green Belt.

Ecology

- 3.11 E3 Ecology Ltd undertook a Preliminary Ecological Assessment (PEA) of the site which was updated again in 2018. The report identifies key ecological constraints to the proposed development, to allow ecological effects to be avoided, minimised and/or mitigated for, and to identifies any further surveys which need to be undertaken.
- 3.12 The additional survey work required is underway and will further inform progression of the masterplan to confirm use of the site by protected and priority species. The mitigation strategy proposed in the PEA aims to minimise the effects on biodiversity by avoiding significant negative impacts where possible through good design and developing approaches to mitigate any remaining unavoidable impacts. The proposals also provide opportunity for ecological benefit through habitat creation and supplementation and bat and bird box provision, contributing to local and national conservation targets.

Highways

- 3.13 A Highways Appraisal has been completed by SAJ Transport Consultants to assess the transport related issues associated with the development.
- 3.14 The appraisal considers that the site is within reasonable walking distance of several primary schools including Shiney Row Primary School, Our Lady Queen of Peace Roman Catholic Voluntary Aided Primary School, New Penshaw Academy and Barnwell Academy. The proximity of the site to the surrounding schools provides a good opportunity to encourage walking as an alternative to private cars.
- 3.15 Although an operational assessment would be required to measure the potential impacts of development on the surrounding road network, it is not considered that this level of traffic would have severe traffic impacts that could not be mitigated. Thus, it is concluded that the proposal affords the opportunity to deliver a development that is accessible by alternative modes of travel to the use of the private car and would not result in severe cumulative impacts on the surrounding road network, both operationally and in terms of highway safety.

Noise

- 3.16 NJD Environmental Associates Ltd were instructed to undertake a noise assessment to determine the site suitability of the development. The noise report was prepared to provide technical evidence with regards to the site suitability for the proposed residential development with measurements taken of noise sources impacting the development.
- 3.17 It is concluded that subject to the recommended mitigation measures being implemented, noise should not be a prohibitive factor for the proposed residential development.

Flood Risk

- 3.18 Wardell Armstrong LLP has undertaken a Flood Risk Assessment and Outline Drainage Strategy for the site. The aim of this report was to demonstrate that the site is appropriate, in terms of flood risk and drainage, for the proposed development and support release of the site for development.
- 3.19 The risk of flooding to the site from sewers, overland flow and groundwater is considered to be low. Overall it is considered that the development proposals can be designed at the next stage to meet current regulatory and best practice guidelines and also to ensure no impact on flood risk on and off site. There are no local site-specific risks that would adversely affect the Flood Zone categorisation. Similarly, there are considered to be no significant increased off-site flooding risks as a result of the development. The site is therefore considered suitable, in terms of flood risk, for the type of development proposed.

Summary

- 3.20 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. Some of the assessments recommend the completion of additional technical work and this will be undertaken prior to the submission of any future planning application.

(3.2) Are all the policy requirements within HGA9 necessary and clear to the decision maker?

- 3.21 Policy HGA9 includes a number of sub points and requirements for development. Consistent with the submitted representations to the consultation on the Regulation 19 draft, Taylor Wimpey requests the following changes:
- iii. Provide sensitive design to minimise the impact on the wildlife and GI corridors to the north and east, providing an appropriate buffer to Herrington Burn and protected species in particular;*
- 3.22 The requested revision to sub point iii is required to ensure that the buffer is linked the ecological evidence at the site and for this matter to be considered at the application stage.
- vi. retain ~~all~~ healthy trees and hedgerows where possible and ~~provide large areas of~~ incorporate greenspace through ~~the centre of the site and in the south west corner, utilising the pylon buffer zone;~~*
- 3.23 Whilst Taylor Wimpey intends to retain healthy trees and hedgerows, there is a need for additional flexibility in sub point vi to ensure the policy is effective and to allow for a planning balanced judgement in the event that the loss of some trees/hedgerows is necessary (eg. to create the site access or internal roads). Taylor Wimpey also requests removing the reference to

the specified locations for greenspace and allowing flexibility so this can be considered in detail at a later stage.

vii. provide ecological improvements to support wildlife in these areas;

- 3.24 In the context of the above sub point vii reads as a duplicate to sub point iii and Taylor Wimpey therefore requests that this is omitted.

x. provide vehicular access via Chislehurst Road. Access from Chester Road will not be permitted. Various A Transport Assessment should be submitted as part of any planning application for the site which takes account of vehicular junctions in the vicinity of the site. should be assessed, including Wensleydale Avenue, A183/Washington Highway and the A183/A19 junction.

- 3.25 Taylor Wimpey requests the amendments to sub point x to ensure the CSDP remains sufficiently flexible to unforeseen circumstances.

- 3.26 Subpoint ii also includes a requirement to “create a new defensible Green Belt boundary to the north and east;”. As explained in our response to question 2.3, and further to representations to the CSDP Publication Draft submitted in July 2018. Taylor Wimpey considers that the south eastern boundary of the site could be amended to define the Green Belt boundary using an existing physical feature which is readily recognisable as per the requirements of NPPF (2012) paragraph 85. Existing physical features exist to the north and east of the site which provide robust boundaries between the site and Herrington Country Park. These changes could remove the requirement for sub point ii.

- 3.27 With the above amendments, Taylor Wimpey considers that the policy requirements are justified and clear.

(3.3) Is the site deliverable?

- 3.28 The site is suitable for housing, is available for development now, and is achievable as the site can be delivered within five years. The site is deliverable in accordance with footnote 11 of the NPPF (2012) and capable of delivering within 5 years of the CSDP being adopted.

4.0 Infrastructure

(6.1) Will the infrastructure to support the scale of development proposed in The Coalfield be provided in the right place and at the right time, including that related to transport, the highway network, health, education and openspace?

- 4.1 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.
- 4.2 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 whilst it considers the requirements arising from the development of the strategic development sites, this does not extend to the HGAs. The CSDP will be supported by the Allocations and Designations Plan, which will provide more detailed policy requirements for the allocated sites, including the

HGAs. It is intended that the IDP will be updated regularly and that any requirements identified through the development of the Allocations and Designations Plan will be included in a future iteration of the IDP.

4.3 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).

4.4 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.

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

4.5 Taylor Wimpey has no comments on this question.

5.0 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)?

5.1 The SHLAA includes a delivery schedule at Appendix B for the Housing Growth Areas. The SHLAA (and CSDP) adopts a conservative approach anticipating that none of the HGAs will deliver within the first 5 years (2018-2023).

5.2 For HGA9, the SHLAA assumes that the site (400 dwellings) will deliver 40 homes per annum from year 2023/24 onwards (to be completed by 2032/33).

5.3 Whilst Taylor Wimpey is satisfied that these delivery rates are realistic, housing trajectory information has been provided to the Council which indicates how the site could come forward sooner.

5.4 In summary, Taylor Wimpey considers that the assumptions are reasonable but there is a likelihood that the HGA9 site could deliver earlier in the plan period.