

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 7

The Strategy and Housing Growth Areas for The Coalfield

This matter considers the strategic policies (SP6 and SS7) and the Housing Growth Areas (HGA9-11) for The Coalfield.

Issues

1. Strategic Policies

1.2 Are Policies SP6 and SS7 justified and effective?

The policy requirements of SP6 identify New Herrington as suitable for housing growth and this is supported by Miller Homes. New homes are required to support the sustainable growth of The Coalfield while retaining the residential focus of the sub-area.

However, the site identified in New Herrington can only accommodate 20 dwellings. It is considered that this size of site will not be able to deliver the requirements of Policy SS7, which requires The Coalfield Housing Growth Areas to:

- 1. provide a mix of housing types with a focus on family homes;*
- 2. address impacts and make provision or contributions towards education provision and healthcare;*
- 3. enhance access to local facilities and services, and [sic]*

To deliver these requirements for New Herrington an additional site should be allocated for housing development. Land at New Herrington, Site Ref. HO3, can accommodate approximately 120 new dwellings and can viably deliver the requirements of Policy SS7.

Without allocating additional land it is considered that policies SP6 and SS7 will not be effective and cannot be considered "sound", as required by policy 182 of NPPF (2012).



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

2. 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?

The Green Belt assessments are considered to support the HGAs in The Coalfield and 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 both the Green Belt assessment and the exceptional circumstances are equally applicable to the Land at New Herrington, Site Ref. HO3.

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.

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

Yes, Miller Homes considers that exceptional circumstances have been demonstrated and articulated in the Plan. The conclusions are also considered to be equally applicable to the Land at New Herrington (Site Ref. HO3).

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

Miller Homes consider that the scale of HGA10 will not deliver the development needs of New Herrington.

To deliver these requirements for New Herrington an additional site should be allocated for housing development. Land at New Herrington, Site Ref. HO3, can accommodate approximately 120 new dwellings and can viably deliver the requirements of Policy SS7.

Without allocating additional land it is considered that policies SP6 and SS7 will not be effective and cannot be considered “sound”, as required by policy 182 of NPPF (2012).

Furthermore, the development of the Land at New Herrington will deliver significant benefits to New Herrington, including:

- delivery of high quality new homes to meet the future growth needs of New Herrington, as well as the wider needs of The Coalfield;
- support the economic development aspirations of the City;
- provide a mix of housing types, especially focusing on family homes;
- significant contributions towards education provision and healthcare;
- support the existing local facilities and services; and,
- deliver traffic calming on St. Aidan’s Terrace, including a potential mini roundabout.

The Land at New Herrington can be successfully developed for residential development with the incorporation of appropriate mitigation to ensure that there will be no adverse impacts on landscape, heritage, biodiversity, access, transport and drainage.

The southern boundary of the site is well defined, following existing field boundaries. Improvements to this field boundary, including gapping up, will ensure that there is a physical feature that is a readily recognisable Green Belt boundary and therefore likely to be permanent, in accordance with paragraph 85 of the NPPF (2012).

2.4 Are the configurations of the settlement breaks justified?

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

3. 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?

Yes, Miller Homes considers that development of the site would be acceptable. The conclusions are also considered to be equally applicable to the Land at New Herrington (Site Ref. HO3).

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

Yes, Miller Homes considers that development of the site would be acceptable. The type of requirements are also considered to be equally applicable to the Land at New Herrington (Site Ref. HO3).

3.3 Is the site deliverable?

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

4. HGA10 – New Herrington

4.1 Is the Council satisfied that the landscape, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?

The site appears to be very constrained, particularly in relation to the requirement to retain and protect the existing trees, which are subject to Tree Preservation Orders. This is likely to impact on the capacity of the site.

4.2 Are all the policy requirements within HGA10 necessary and clear to the decision maker?

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

4.3 Is the site deliverable?

The site has an estimated capacity of 20 dwellings, which we consider will be difficult to deliver given the constraints of the site.

Furthermore, due to the limited scale of the development it is unlikely to be able to deliver the policy requirements of SS7 requirements, including education and healthcare provision.

5. HGA11 – Philadelphia

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?

Yes, Miller Homes considers that development of the site would be acceptable. The conclusions are also considered to be equally applicable to the Land at New Herrington (Site Ref. HO3).

5.2 Are all the policy requirements within HGA11 necessary and clear to the decision maker?

Yes, Miller Homes considers that development of the site would be acceptable. The type of requirements are also considered to be equally applicable to the Land at New Herrington (Site Ref. HO3).

5.3 Is the site deliverable?

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

6. 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 open space?

The policy requirements of SP6, SS7 and HGA9, HGA10 and HGA11 require a scale of development that can deliver the required infrastructure.

However, the site identified in New Herrington (HGA10) can only accommodate 20 dwellings. It is considered that this size of site will not be able to deliver the requirements of Policy SS7, which requires The Coalfield Housing Growth Areas to:

- 1. provide a mix of housing types with a focus on family homes;*
- 2. address impacts and make provision or contributions towards education provision and healthcare;*
- 3. enhance access to local facilities and services, and [sic]*

To deliver these requirements for New Herrington an additional site should be allocated for housing development. Land at New Herrington, Site Ref. HO3, can accommodate approximately 120 new dwellings and can viably deliver the requirements of Policy SS7.

Without allocating additional land it is considered that policies SP6 and SS7 will not be effective and cannot be considered “sound”, as required by policy 182 of NPPF (2012) and the required infrastructure will not be deliverable.


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

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

7. 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)?

It is considered that approximately 120 dwellings from the development of Land at New Herrington could be delivered within 5 years.

 Planning boundary



Rev.	Description	Drawn	Date
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Project Title
Land at New Herrington

Drawing Title
Location Plan

Scale	Drawn By	Checked By	Authorised By
NTS	OR	-	-
	Date May 19	Date -	Date -

Job No.	Drawing No.	Revision
807---	LNH/LP/001	-

Original Sheet Size A3