



# Sunderland Local Plan Examination

## Story Homes and Mr Michael Ford - North of Usworth Hall

### Matter Statement 7 - Strategies and Allocations for Washington

---

**Issued** May 2019

---

#### **1.0 Strategic Policies**

##### **(1.1) Are Policies SP3 and SS2 justified and effective?**

##### **Policy SP3 (Washington)**

- 1.1 In respect of their land interest North of Usworth Hall (HGA4), Story Homes and Mr Michael Ford ("our Client") supports the Council's approach to the release of land from the Green Belt in the Washington sub-area for residential development.
- 1.2 Our Client agrees with paragraph 4.40 which states that Washington (the town and the sub area) is a highly sustainable location and that the Washington "*sub-area has been constrained from development by the tightest of the Green Belt boundaries and due to the lack of available land for development within the urban area.*" (paragraph 4.41). This has resulted in suppressed housing need within the local area. Accordingly, our Client agrees that amendments to the Green Belt are required to allow for sustainable expansions of settlements to meet the long terms needs of the city.
- 1.3 Core Strategy and Development Plan (CSDP) paragraph 4.24 explains how a balanced approach has been taken to ensure the "*needs of the entire city are met*". Our Client strongly supports the approach to the release of land from the Green Belt which, as identified in paragraph 4.28, is "*the most sustainable solution*". The Washington sub-area in particular would not be able to accommodate housing growth without doing so.
- 1.4 Therefore, our Client considers that the distribution of housing across the sub areas and that the allocation of HGA4 is justified and it will support the sustainable growth at Washington.
- 1.5 Policy SP3(3) details the Housing Growth Areas (HGAs) which includes land at North of Usworth Hall (HGA4). Whilst our Client supports this allocation, this represents only a partial extent of the land available for development. As set out in our previous representations to the CSDP and the Technical Summary document (submitted with representations to the consultation on the CSDP Publication Draft in July 2018), 18ha of land is deliverable and could provide approximately 340 homes within the plan period.
- 1.6 Our Client is concerned that given the limited land availability in the sub-area this could result in the need for further release of Green Belt land during the next plan period or potentially sooner in the Local Plan review. Whilst our Client supports the housing strategy in the CSDP, allocating the wider 18ha site area as part of Policy HGA4 would reduce this risk whilst also

ensuring that the housing release sites are based on strong and defensible Green Belt Boundaries.

- 1.7 Notwithstanding this, our Client recognises that SP3(4) makes provision for safeguarded land (SS3) at East Washington and South of Springwell. If the Council does not support the approach to extend the allocation of HGA4, it is considered that the additional land within the control of our Client immediately north of the HGA4 could be included as safeguarded land.
- 1.8 The development of additional homes on the site will deliver significant and lasting economic, social and environmental benefits to the local community. Socially, it would further contribute to meeting Sunderland's housing requirement, widening the range and choice of new homes in the wider Washington sub area, whilst concurrently helping to retain and attract economically active, skilled residents who will generate significant local area spending, enhancing the vitality of local services. Development of the site also has the potential to deliver biodiversity enhancements through the creation of new habitats and other environmental benefits by promoting sustainable methods of travel.

#### **Policy SS2 (Washington Housing Growth Areas)**

- 1.9 Policy SS2 appears to be consistent with the equivalent overarching policies for the housing growth areas in the other sub-areas. Our Client broadly supports Policy SS2 but offers the following comments in response to each of the sub points.
- 1.10 SS2(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.
- 1.11 SS2(2) states that development should “*address impacts and make provision or contributions towards education provision and healthcare*”. In order to be effective, this should be linked to the planning obligation tests set out in the NPPF (2012) (paragraph 204). Accordingly, we request the following amendment:  
*“2. address impacts and make provision or contributions towards education provision and healthcare where justified and necessary.”*
- 1.12 SS2(3) states that development should “*enhance access to local facilities and services and*”. As currently drafted, the requirements upon an applicant are not clear and thus the policy is not effective. We suggest that the following amendment would provide clarity and ensure the effectiveness of the policy:  
*“3. enhance access to local facilities and services where appropriate and.”*
- 1.13 With these suggested minor amendments Our Client would consider that Policy SS2 is justified and effective.

## 2.0 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?**

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 North of Usworth Hall which was assessed under parcel reference 463A.

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 the Council'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 Washington sub area. 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 Our Client 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 CSDP paragraph 4.40 states that Washington (the town and the sub area) is a highly sustainable location and paragraph 4.41 explains how the “*sub-area has been constrained from development by the tightest of the Green Belt boundaries and due to the lack of available land for development within the urban area*”.
- 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*” (paragraph 5.4).
- 2.11 Our Client 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 It is also considered that the Plan provides a clear and comprehensive explanation of the exceptional circumstances which exist to justify the removal of land from the Green Belt.

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

- 2.13 The proposed allocation of HGA4 (North of Usworth Hall) represents a partial extent of the land available for development.
- 2.14 Whilst our Client strongly supports the release of HGA4 from the Green Belt, it is considered that the site in Policy HGA4 could be extended to include the additional land for delivery in the plan period. The completed technical work demonstrates that the wider 18ha site is deliverable and could provide around 340 homes within the plan period. This minor modification to the Green Belt boundary will also ensure it is defined using a physical feature which is readily recognisable as per the requirements of NPPF (2012) paragraph 85.

### **(2.4) Is there any justification for the allocation of the safeguarded sites at this stage?**

- 2.15 Our Client recognises that SP3(4) makes provision for safeguarded land (SS3) at East Washington and South of Springwell. If the Council does not support the approach to extend the allocation of HGA4, it is considered that the additional land within the control of our Client immediately north of the HGA4 could be included as safeguarded land.

### 3.0 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?**

- 3.1 Our Client supports the Council's assessment that any constraints to development can be mitigated so that development of the site would be acceptable.
- 3.2 The Council's SHLAA (2018) and Development Frameworks document (2018) identifies a number of site constraints and opportunities including landscape, heritage, biodiversity, access, transport, drainage, noise and agricultural land. The submitted technical assessments provide 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.

#### **Landscape**

- 3.3 A Landscape and Visual Statement (LVS) has been prepared by Pegasus Group to provide technical landscape evidence to support the allocation of the site. Overall the LVS states that the character of the site is considered to be of medium to medium/low sensitivity to the proposed development. The LVS demonstrates that the visibility of the site from the surrounding area is limited. Overall, it is considered that the development of this site could be achieved without significant harm to Green Belt purposes and that this would apply to the whole of the site (c.18 hectares) and not just to the partial land area currently proposed as a housing release site (c.11 hectares). The LVS also outlines how development at the site could deliver new green infrastructure which would strengthen the local and city-wide networks and therefore contribute to delivering other CSDP objectives.

#### **Heritage**

- 3.4 An Archaeological Desk-Based Assessment has been undertaken by Durham University Archaeological Services to assess the nature, extent and potential significance of any surviving archaeological features at the site. LiDAR data shows modern ploughing across the fields of the proposed development area, together with field drains. No previous archaeological works have been identified within the proposed development area.
- 3.5 In terms of heritage assets, the Grade II listed Usworth Hall is located to the south of the site but has no interrelationship with the site. There are no Scheduled Ancient Monuments or other designated heritage assets nearby.

#### **Ecology**

- 3.6 A Preliminary Ecological Appraisal (PEA) has been undertaken by E3 Ecology to identify any ecological constraints to the proposed development which will subsequently inform the masterplan for the site. The features of ecological value are limited mainly to the site boundaries and off-site. Land immediately to the north of the River Don is allocated for development, in the Core Strategy and Urban Core Plan for Gateshead and Newcastle, and is also the subject of approved planning applications. This demonstrates that there are no ecological constraints which preclude development.

- 3.7 The development provides an opportunity for ecological benefit through habitat creation and supplementation and bat and bird box provision, contributing to local and national conservation targets.

### **Highways and Access**

- 3.8 A Highways Appraisal has been undertaken by SAJ Transport Consultants which provides an initial assessment of the access options; accessibility; and traffic impact. With an appropriately designed internal road layout (such as the incorporation of a loop arrangement), this would form an acceptable vehicular access to serve to proposed development.
- 3.9 The site is confirmed as accessible to services and facilities both locally and further afield. In terms of walking and cycling, an extensive pedestrian footway network is available from the site providing a safe and convenient walking route from the site to the nearest bus stops. The services and facilities within this distance from the centre of the site include primary schools, nursery schools, Sunderland College Washington campus, many employment opportunities, convenience retail store, community centres, social club, place of worship and various leisure facilities. Bus stops provide high frequency services to local and regional destinations. In addition to the local road network, there are a number of traffic-free cycle paths which provide cyclists with readily accessible routes to schools, retail destinations and employment opportunities.

### **Flood Risk and Drainage**

- 3.10 A Flood Risk Assessment (FRA) has been undertaken by CK21 to assess the risk of flooding to the proposed development (from all likely sources, including fluvial, surface water and sewer, etc.); the possible impacts and limitations this might present to the development; as well as assessing the potential impact of the development to ensure that there is no adverse impact offsite.
- 3.11 The Environment Agency Flood Map for Planning indicates that the majority of the site is located within Flood Zone 1 with the south eastern corner of the site classified as Flood Zone 3. Development can be planned in such a way to ensure that the properties and essential infrastructure remain outside of the Flood Zone 3 extent. In doing so, the risk to the site can be classified as low. The risk from all other sources of flooding is considered to be low.
- 3.12 Subject to appropriate masterplanning and an appropriately designed strategy to manage surface water the risk of flooding from all sources is considered to be low. Furthermore, the development would not result in any increase of flooding elsewhere.

### **Noise**

- 3.13 A Noise Assessment has been completed by L A Environmental Ltd to assess the suitability of the site for residential development in terms of the prevailing noise environment and provides information on any mitigation measures required to achieve the recommended noise levels for habitable rooms and external amenity space. Subject to final definition and the subsequent provision of noise amelioration measures, the residents of the proposed dwellings will be provided with acceptable internal and external (private amenity areas) noise environments, in line with all current guidance.



### Summary

- 3.14 The studies carried out by our Client as described above show that the technical constraints of the site are capable of being mitigated, allowing development of this sustainable site to be delivered.

### **(4.2) Are all the policy requirements within HGA2 necessary and clear to the decision maker?**

- 3.15 Policy HGA4 sets out a series of sub points and requirements for development. Consistent with the submitted representations to the consultation on the Regulation 19 draft, our Client request the following changes:

*i deliver approximately ~~205~~340 new homes;*

- 3.16 This change request is consistent with our view that land within HGA4 should be extended to include the land currently identified as safeguarded.

*iii. ~~provide greenspace/green infrastructure within the site;~~*

- 3.17 Sub point iii relates to a requirement to provide greenspace/green infrastructure within the site however it appears to duplicate the requirements in subpoints v and vi which refers to specific areas of the site. As such, we request that the text in sub point is removed.

*vii. ~~be of high architectural quality take into account local vernacular along the northern edge of the site to and seek to retain protect long distance views to the northern edge and to reflect the local vernacular;~~*

- 3.18 Sub point vii currently confuses architectural and landscape disciplines. A Landscape and Visual Statement (LVS) has been prepared by Pegasus Group to provide technical landscape evidence to support the allocation of the site. This is summarised in the submitted Technical Summary Document. The latter includes an indicative masterplan – informed by the LVS – which demonstrates how the development would enable long distance views.

- 3.19 Subpoint ii also includes a requirement to “create a new defensible Green Belt boundary to the north and west;”. As explained in our response to question 2.3, our Client considers that it would be a logical approach to define the Green Belt boundary using an existing physical feature which is readily recognisable as per the requirements of NPPF (2012) paragraph 85. The Green Belt Boundary Paper (2018), which forms part of the CSDP evidence base, extends the eastern boundary of the land to be released. The revised Green Belt boundary is based on the Leamside Line. Our Client supports this update, which is based on an existing physical feature, and requests that the CSDP is updated to reflect this change. Our Client considers that this could be amended via a minor modification and in doing so this would remove the requirement for sub point ii.

- 3.20 With the above amendments, our Client considers that the policy requirements would be justified and clear.

### **(4.3) Is the site deliverable?**

- 3.21 The site is suitable for housing, is available for development now, and is achievable as the site can be delivered within the plan period. The site also has the benefit of an end developer in Story Homes who has been actively promoting the site for several years. The site is deliverable

in accordance with footnote 11 of the NPPF (2012) and capable of delivering within the plan period.

## 4.0 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?**

- 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.

## 5.0 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)?**

- 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 HGA4, the SHLAA assumes that the site (205 dwellings) will deliver 25 homes in year 2026/27 and 30 homes 2027/28 per annum in years 27/28 -2032/33. Whilst our Client is satisfied that these delivery rates are realistic, there is a likelihood that the HGA4 site could deliver earlier in the plan period.
- 5.3 Our client has also considered the scenario if the wider site (for approximately 340 dwellings) comes forward, which is anticipated to be completed within the plan period.