

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:

Matters 10 and 11

Infrastructure and Delivery/Monitoring and Implementation

This matter considers overall infrastructure provision and its implications for viability and deliverability and monitoring and implementation provisions.

In terms of infrastructure the Council advises that it has had regard to the pooling limitations in considering the delivery of infrastructure alongside the allocations. For clarity Criterion 3i. of Policy NE4 is to be modified to refer to 'greenspace' and not just 'amenity greenspace'.

The Plan is to be modified to include a cross-reference to the Monitoring Framework, include key triggers that could lead to a review of the Plan, and clarify which SPDs and UDP policies are still extant.

Issues

Matter 10 – Infrastructure and Delivery

1. The evidence base underpinning the LP

1.1 Does the Plan and Whole Plan Viability Study make realistic assumptions about land values, sales values, profit and development costs?

Miller Homes have a number of concerns regarding the assumptions in the Whole Plan Viability Study. However, the main area of concern is the assumptions on build costs.

The Whole Plan Viability (SD.60) states:

"the construction costs in this study are taken to be the mid-point between the median figure and the lower quartile figure, which is £887/m² for Estate Housing – Generally" (paragraph 7.3).

In comparison, South Tyneside Council have recently consulted¹ on their Local Plan & CIL Evidence base and have proposed:

"to apply BCIS lower quartile values for "general estate housing" (rebased to Tyne and Wear) with a discount of 5% for residential developments of 50 units or more to reflect the discounts in build costs which volume housebuilders can secure."

¹ Local Plan & Community Infrastructure Levy Evidence Base: Stakeholder Questionnaire Survey, South Tyneside Council (1 May 2019)

This is identified as a construction cost of £946/m², which is considered to be more realistic. This difference of £59/m² is considered to be significant given that they are adjacent Local Planning Authorities.

Miller Homes would welcome the Council's views on this discrepancy and the likely implications for the Whole Plan Viability (SD.60).

2. Transport Network

- 2.1 Are the transport routes identified in Policy SP10 necessary to support sustainable development?*
- 2.2 Will the routes support the use of sustainable modes of transport?*

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

3. Policies ID1 and ID2

- 3.1 Will Policy ID1 and the allocation policies of the Plan ensure that necessary infrastructure is delivered and in a timely fashion?*
- 3.2 Is Section 2 of Policy ID1 and the link to the IDP too prescriptive?*
- 3.3 Are the policies consistent with the legal and policy tests for planning obligations?*
- 3.4 Are the policies clear as to the effects of viability on the ability to make infrastructure and other contributions/obligations?*
- 3.5 Is the requirement within Policy ID2 to seek monitoring fees justified?*

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

4. Greenspace

- 4.1 Will Criteria 2 and 3 of Policy NE4 deliver sufficient greenspace alongside new development so as to create well-designed neighbourhoods which support healthy lifestyles and well-being?*

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

5. Pooling of Contributions

- 5.1 Are there likely to be any implications arising from the pooling restrictions within the Community Infrastructure Levy (CIL) Regulations for the delivery of infrastructure going forward?*

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

6. IDP

- 6.1 Is the IDP clear as to what infrastructure projects are critical to the delivery of the LP, when infrastructure will be delivered, sources of funding and who is responsible for delivery?*

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

Matter 11 - Monitoring and Implementation

1. Monitoring Framework

1.1 Is the Plan clear in indicating how the Plan's policies and proposals will be monitored?

Miller Homes considers that the monitoring, as set out in the *Core Strategy and Development Plan Monitoring Framework* (2018) (SD.13) are clearly set out.

However, there is no policy requirement within the Plan to ensure that, for example, a review of the Plan/Policy is implemented if a trigger event occurs. It is recommended that, to be found "sound", a suitably worded policy is included in the Plan.

1.2 Will the indicators in the Monitoring Framework be effective in monitoring the success of the Plan's policies and proposals?

Miller Homes considers that the monitoring, as set out in the *Core Strategy and Development Plan Monitoring Framework* (2018) (SD.13) are clearly set out.

However, there is no policy requirement within the Plan to ensure that, for example, a review of the Plan/Policy is implemented if a trigger event occurs. It is recommended that, to be found "sound", a suitably worded policy is included in the Plan.

2. Review of the Plan

2.1 Is the LP clear as to when a review or partial review of the LP would be triggered due to a failure to meet key targets, for example for those relating to the delivery of housing?

No, there is no policy requirement within the Plan to ensure that, for example, a review of the Plan/Policy is implemented if a trigger event occurs as set out in the *Core Strategy and Development Plan Monitoring Framework* (2018) (SD.13). It is recommended that, to be found "sound", a suitably worded policy is included in the Plan.

3. Supplementary Planning Guidance

3.1 Is the Plan clear on the SPD that will be prepared to provide guidance on the implementation of the Plan?

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

4. Saved Policies

4.1 Is the Plan clear on which UDP policies are to be saved or superseded?

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