Agenda Session 2 – 13.30 Tuesday 21 May 2019 Matter 2 Spatial Strategy and Related Policies

The matter considers whether the strategy for the distribution of development is justified and whether related strategic policies are positively prepared, effective and consistent with national policy.

Justification for safeguarded land is also proposed to be included in the spatial strategy chapter (MM4). Clarification has also been provided on the Council's approach to valued landscapes (MM40).

Specific sites will be discussed during Week 2 of the hearings.

Issues:

1. The spatial distribution of development across the sub-areas

1.1a Is the spatial distribution of development within the Sub-Areas clear from the Plan and justified?

In response to preliminary questions the Council has put forward MMs to show the apportionment of housing and employment growth across the area as part of the supporting text to Policy SP1 (MM2 and MM3). The Council considers that the spatial distribution has been determined by available land taking into account constraints, utilising the most sustainable locations throughout the city.

1.1b Should more housing growth be focused on Washington to support its role as an economic hub?

1.1c Should Policy SP1 make specific reference to the South Sunderland Growth Area?

1.1d Does the Employment Land Review show an imbalance in employment land in the Sub-Areas e.g. South Sunderland, such that more employment land should be released for housing?

1.2 Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?

The Council suggest that, in using the most sustainable locations for development in each of the sub-areas, there would be a reduced need to travel and opportunities for using alternative forms of transport other than the private car. Reference is also made to the Sustainability Appraisal such that likely environmental and sustainability effects have been taken into consideration.

2. The split between the Existing Urban Area and elsewhere and between brownfield and greenfield land

2.1a Is the split between the Existing Urban Area and elsewhere and between brownfield and greenfield land clear from the Plan and justified? The Council refers to paragraphs 4.22 and 4.29 of the LP and Additional Modification (AM) 21.

2.1b Should the Plan make it clearer the breakdown of greenfield and brownfield land for each sub-area?

2.2a Has the Plan robustly explored the effective use of brownfield land to meet development needs?

The Council considers that sites which are deliverable or developable have been fully assessed through the Strategic Housing Land Availability Assessment (SHLAA) process and included within the supply. Taking into account the Viability Assessment which indicates that the city has challenging areas, 44% of the deliverable SHLAA supply is on brownfield land. Densities have been adjusted to take into account the need for larger homes and bungalows.

2.2b In particular have opportunities for development on sites within the Existing Urban Areas of the Sub-Areas that are constrained by Green Belt been robustly explored? 2.3 Are there areas of brownfield land, including land identified as Key Employment Areas, that should be allocated for housing, taking into account employment land requirements and viability and deliverability issues?

The Council points out that it has already identified through the Employment Land Review a number of sites that are no longer required for employment which are included in the SHLAA as deliverable land. Given that the supply of employment land is tight, the Council does not consider it appropriate to release further existing employment areas for residential development. That said the terms of Policy EG2 allow some flexibility for alternative uses in Key Employment Areas.

Green Belt and Exceptional Circumstances (Green Belt alterations will also be discussed in relation to Housing Growth Areas during Week 2)

3.1a Has, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

The Council refers to the explanation in Chapter 4 of the LP, supported by SD.33 and SD.66.

3.1b Does the evidence base, including assessment of OAN and opportunities for development in the urban area, demonstrate exceptional circumstances?

3.1c Does the housing land supply position justify Green Belt release?

3.1d Should more land be released from the Green Belt to meet development needs within the Plan period such as land to the east of Washington and East Springwell (currently safeguarded land) and additional land at North Hylton?

3.2a Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities?

The Council refers to work undertaken with South Tyneside Council, particularly in connection with the International Advanced Manufacturing Park (IAMP) Area Action Plan (AAP). Discussions have taken place with Gateshead and Durham Councils. Issues raised focus principally on the potential impact of development on the strategic Green Belt gap between Washington and Gateshead.

3.2b Is the approach to previously-developed sites within the Green Belt consistent

with that being followed by Gateshead Council?

4. The principle of safeguarded land being identified to meet longer-term development needs

(Green Belt alterations will also be discussed in relation to Safeguarded Land during Week 2)

4.1 Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs?

Taking into account paragraph 85 of the Framework, the Council considers it necessary to safeguard land between the urban area and the Green Belt to meet longer-term development needs.

4.2 Has enough land been proposed for safeguarding to meet longer-term development needs?

The Council considers that sufficient land has been safeguarded, particularly given that Councils must now review their Local Plans every five years and that over the course of the 15 year period of the Plan new sustainable sites may come forward for redevelopment within the urban area.

4.3a In general terms is the safeguarded land in the right place to meet longer-term development needs?

The Council notes that in locational terms, the 2 safeguarded sites are most appropriately located within the Washington sub-area, where demand is highest and future land supply is most constrained. Other suggestions for safeguarded land are generally in areas which have sufficient housing land supply for significant levels of housing growth e.g. South Sunderland and the Coalfield.

4.3b Should more safeguarded land be identified throughout the Plan area e.g. South Sunderland, North Sunderland, the Coalfield and Washington?

5. The principle of 'Settlement Breaks' and the terms of Policy NE7

5.1a Does the evidence base and, in particular SD.48, support the principle and general extent of the settlement breaks?

5.1b Do other policies such as NE8 and NE9 provide more appropriate protection for the areas identified?

The Council refers to SD.66 and SD.48 in providing justification for the principle and configuration of Settlement Breaks.

5.2a Are the provisions of Policy NE7 (Settlement Breaks) justified and consistent with national policy or are they too restrictive?

The Council refers to the longstanding success of the policy in focusing development in urban areas and preventing the merging of settlements and the current healthy housing supply position.

5.2b Should Policy NE7 be clearer as to what would constitute essential development?

6. Whether Policy NE8 is consistent with national policy.

6.1 Is Policy NE8 consistent with paragraphs 17 and 109 of the Framework? The Council points out that Open Countryside has various constraints/features which are worthy of protection and represent the least sustainable development areas in the city.

6.2a Is the Plan clear as to areas of 'valued landscape' and are these areas justified? The Council has proposed MM40 so that the supporting text to Policy NE8 cross references with the Sunderland Landscape Character Assessment (LCA) (SP.47) and in particular Figure 3.2 (page 11).

6.2b How is Figure 3.2 of the LCA to be incorporated into the LP? (There is reference within MM40 to a Map in Appendix 3)

6.3 Should Policy NE8 allow for development sustainably located on the edge of settlements, particularly where there is a lack of a 5-year housing land supply? The Council does not consider that such an approach would be appropriate in view of the housing land supply position, the availability of the measures set out at para 6.9 of the Plan and the need to review LPs every 5 years.

Main Evidence Base

SD.22 - SHLAA

SD.33 - Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for

Releasing Land from the Green Belt - June 2018

SD.37 – Employment Land Review

SD.48 - Settlement Break Review 2018

Whole Plan Viability Assessment for the Plan (SD.60)

SD.66 - Compliance Statement

SP.47 - Sunderland Landscape Character Assessment

EX1.008 & EX1.010 - Council responses to Inspector's preliminary questions

EX1.018 - Schedule of Main Modifications

Statements

EX3.001 - Sunderland City Council

EX3.002 - John Blundell (ID1170267)

EX3.003 - Paul Milner - CPRE Durham (ID1175874)

EX3.004 - Councillor Denny Wilson - Castle Ward (ID461566)

EX3.005 - Andrew Moss (Ward Hadaway) - Ray Delaney (ID1036112)

EX3.006 - Springwell Residents' Association (ID868362)

EX3.007 - Andrew Rose - Spawforths (Barratt & David Wilson Homes) (ID992525)

EX3.008 - Nicola Allan - Trinity Chambers (Mr & Mrs Ebdale & Others) (ID1136253)

EX3.009 - Lucie Jowett - Barton Willmore (Church Commissioners for England) (ID1019692)

EX3.010 - Phil Jones - Homes England (ID1175997)

EX3.011 - Richard Garland - George F White (Avant Homes) (ID1135316)

EX3.012(a) - Chris Smith - Lichfields (Story Homes-Norman Elliott) (ID963412)

EX3.012(b) - Chris Smith - Lichfields (Story Homes-Michael Ford) (ID963412)

EX3.013 - Chris Smith - Lichfields (Taylor Wimpey) (ID1120527)

EX3.014 - Chris Smith - Lichfields (Hellens) (ID1169009)

EX3.015 - Chris Smith - Lichfields (Burdon Lane Consortium) (ID1131101)

EX3.016 - Richard Swann - Barton Willmore (Persimmon Homes) (ID1129305)

EX3.017 - James Reid - Hedley Planning (Miller Homes) (ID497082)

EX3.018 - Robin Wood - R&K Wood Planning (Mr C S Ford) (ID1170835)

Participants

Sunderland City Council

Name	Company	Representing	ID Number
Chris Smith		1 5	
Neil Westwick	Lichfields	Story Homes	963412
Richard Newsome			
Chris Smith			
Neil Westwick	Lichfields	Taylor Wimpey	1120527
Steve Willcock			
Chris Smith			
Neil Westwick	Lichfields	Hellens	1169009
Gavin Cordwell-Smith			
Katie Rumble			
Chris Smith	Lichfields	Burdon Lane	1131101
Neil Westwick		Consortium	
Katie Wood	R & K Wood Planning LLP	Clive Milner	1171236
Andrew Rose	Spawforths	Barratt & David	992525
		Wilson Homes	
Phil Jones	Homes England		1175997
Andrew Moss	Ward Hadaway	Mr Delaney	1036112
		Springwell Village	
Michele Johnson		Residents'	868362
		Association	
		Springwell Village	
George Martin		Residents'	868362
		Association	
John Blundell	Resident		1170267
Cllr Denny Wilson	SCC	Castle Ward Cllrs	461566
		Representative	
Christopher Martin	WYG	Bellway Homes Ltd	1116059
Robin Wood	R & K Wood Planning LLP	Mr C S Ford	1170835
Richard Bradley		Green Party	1139629
Ian Edworthy	Resident		1000585
Karen Read	K L R Planning	Mr Alan Hutchinson	1176031
Nicola Allan	Trinity Chambers	Mr & Mrs Ebdale,	1136253
		PAWZ for Thought	
		and Others	
James Hall	Persimmon Homes	Barton Willmore	1129305
Richard Garland	George F White	Avant Homes	1135316

Richard Cowen		CPRE (NE)	1175874
James Reid	Hedley	Miller Homes	497082
		Church	
Lucie Jowett	Barton Willmore	Commissioners for	1019692
		England	
Anthony Ormond	Resident		1123971
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