

Session 4 13.30 Wednesday 22/05/2019 **Matter 5** Specific Housing Needs and Standards **John Blundell ID01170267**
 1.1 Is the requirement for at least 15% of dwellings on major developments justified by the evidence base including that relating to viability?

Permission consents **7,675** SD1 P4.22, and **3,522** 2015-2018 completions and projected **9,011** 2015-2033 have negated the NPPF for the “right homes in the right places” as well as the right quantity. Indicative of the SHLAA potential **11,555** as **59.90%** as non-Brownfield register, while only **4,633** **40.10%** of a SHLAA2018 potential as Brownfield register. The Local Plan methodology for affordable housing is limited and self-inflicted.

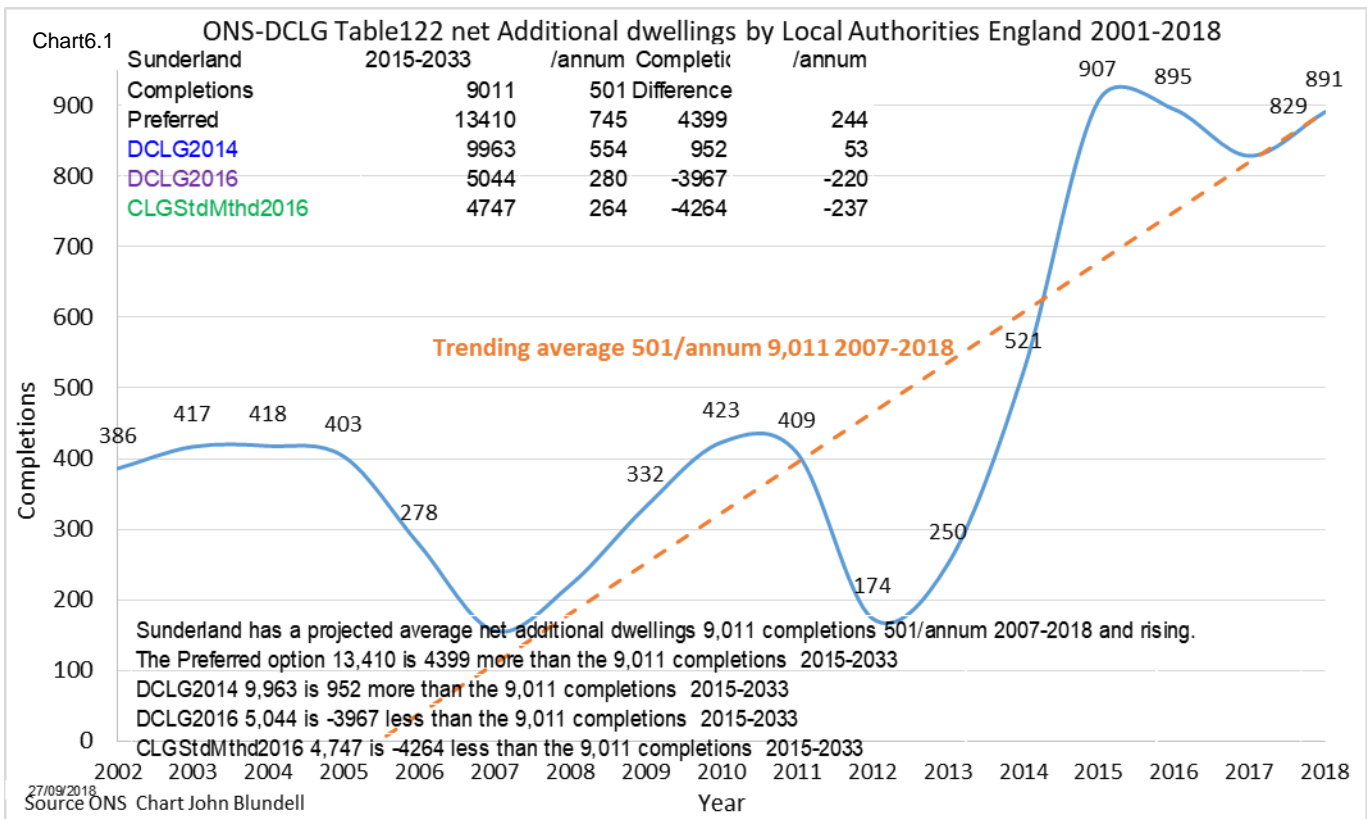
Table7.1

Hectares	MinNet Dwellings	MinNet density	Urban at 40/ha	Semi Urban at 30/ha	Rural at 20/ha	CLG2016	40/ha % of CLG2016	SHLAA potential	SHLAA% Non Brownfield	SHLAA% as Brownfield
170.29	4,633	27.21	6,812	5,109	3,406	5,044	135.04	11,555	59.90%	40.10%

Affordable at 10%-15% for low to medium value areas is undersupply. The Brownfield register as minimum Net density of **27.21/ha**, while at 40/ha as a potential **6,812** not applied, negates most possibility for affordables to be >10%.

The inappropriate use of Housing densities at **<30/hectare** as inefficient land use and by default excludes affordability, indicative of the SHLAA potential as **27.21**units/hectare.

While SunderlandCC has aspiration for **13,410** houses there is no historic evidence that significant Affordable housing have, or will be achieved. **7,675** new homes with Permission consents or to be approved. A SHLAA indicative of a predominant <30units/hectare housing density that excludes new affordable housing as a disproportionate affordable undersupply to Sunderland permissions, and completions. Not only an excessive aspiration **13,410**, but also an ineffective, supply allocation for new build affordable at <15%. The projected completions **9,011** **501/annum** 2015-2033 (trendline for 2007-2018) **Chart6.1** is the build rate aspiration within Sunderland of that Preferred option **13,410** housing is a Mansions charter within those **7,675** with permission consents already. It is perverse to be using 15% for affordability when most of the housing requirement is already allocated with permission consents without adjudication within a Local Plan.



No MIQ for 1.2, 2.1, 2.2 or 3.1

4.1 Are the terms of Policy H1 in relation to accommodation for older people likely to be effective and are they justified?

Older people, particularly the retired often wish to downsize from 3-4 bedroom larger houses to small bungalows, and Flats 2 bedrooms. That natural progression also increases the available housing stock as large houses released to full use. However to promote the provision of larger detached dwellings runs contrary to Government initiative to increase housing stock and to have efficient land use. Instead of H1 2i providing larger detached dwellings the opposite should be the

direction to increase availability and affordability. In a Local plan that proposes to delete valued Greenfield/green belt, it is perverse to have policies that actively waste that land with inefficient land use at low densities. There is a contradiction if Policy H1 endeavours to provide larger dwellings while H2 restricts Affordables to 15%. The bar is set too low at 15% as most of the **13,410** housing is supposedly intended for imported workers who will not be buying large detached dwellings. SunderlandCC need to explain why is there an aspiration for **13,410** houses which will use exceptional circumstances to validate deletion of Green belt on the grounds of economic necessity to build houses for the imported workers.

Policy H1 contradicts that exceptional circumstances for economic necessity grounds that justifies the Green belt deletion as some or most of the houses are actually going to be larger detached dwellings and not affordable for most of the imported workers. A stringent economic necessity exceptional circumstances given to delete Green belt for worker housing, yet not affordable for that workforce. Policy H1 undermines that reason for exceptional circumstances by advocating larger detached houses as unaffordable and nothing to do with stringent economic necessity for exceptional circumstances.

Reasons given for exceptional circumstances that in effect has little intention to actually provide the affordable housing for economic necessity. Also similar anomaly in Policy H2 with only 15% of **13,410** as affordable, yet stringent economic necessity for exceptional circumstances used while not following through with delivering the affordables for that workforce. Only to deviate from that economic necessity to build unaffordable large detached dwellings instead. That is inappropriate reasons to delete Green belt or high value Greenfield. There is no economic necessity as Sunderland is the NE12LAs highest rank order **90.1GVA/hr**, with flat lining house prices as a stress free Housing market, and a workforce proven to be mostly residents and commuters already with houses. Jobs losses **-21900** 2013-2014 and job gains **26,000** 2014-2018 have been accommodated those swings with hardly any extra dwellings indicative of the lack of necessity for most of **13,410** housing aspiration.

4.2 Is the requirement for developments to provide larger detached dwellings justified?

Inefficient use of Brownfield and Previously Developed Land housing densities. SHLAA.

The real objective need is for affordable, and to allow downsizing for 65+ age group, which is not addressed by Brownfield register **27.21/ha** housing densities, but preferences for unaffordable excessive ¼ acre 3 bedroom detached+ which is implied by <30units/hectare. This indicates the whole of the SunderlandCC Local Plan is not prioritising Brownfield sites, new build affordability at <20% in the Plan policies. Greenfield is to be used as inefficient land use, wasting valuable amenity land for unnecessary excessive housing that uses housing density more designed for an average Executive **0.25ha** dwelling at 20/ha density plots (approximate house price £500,000) than to supply for demographic, affordability, and economic needs as 40/hectare. It is contradictory to validate the excessive housing as required for imported workers, then to use <30/ha density, and aspiration for executive housing.

2012NPPF17 These 12 principles are that planning should:

●● encourage the effective use of land by **reusing land that has been previously developed (brownfield land)**, provided that it is not of high environmental value;

It is the lack of jobs availability, rather than the lack of housing choice as to why there is high out migration. That historic lack of jobs and high out migration is contrary to an over ambitious aspiration for 10,337 jobs. It is also evidenced in more out-less in commuting in periods of job losses. The main driver is jobs, not housing.

5.1 Is criterion 1. iii of Policy H1, as proposed to be amended, likely to be effective in encouraging high density developments in suitable locations?

The Government initiative is to increase housing stock, however that is restricted if the accepted level for affordables is 15%. Both LA and developer then perpetuate an ever reducing allocation for affordable housing. The initiative is to increase housing stock at densities greater than for larger detached properties, and to promote efficient use of valued land.