

1. The spatial distribution of development across the sub-areas**1.1 Is the spatial distribution of development within the Sub-Areas clear from the Plan and justified?**

The map (within the Plan) shows disproportionate housing growth areas on the periphery of the Authority boundaries on greenbelt land. We consider this is not justified as it does not meet the needs – young, older and elderly people needing small units close to services such as public transport and health facilities.

1.2 the effects on environment and climate change are obviously higher in these areas because the lack of local public services results in a reliance on cars.

2. The split between the existing urban area and elsewhere and between brownfield and greenfield land**2.1, 2.2, 2.3**

We do not believe the split is made clear in the Plan. There is no simple clear demonstration in spatial terms of the split. In our area of Washington there is much brownfield land, disused industrial land and old, vacant industrial premises that seem not to have been included as potential housing sites within the Plan whilst greenbelt deletions are being proposed. We cannot find any justifications and when asked the Authority claims that developers are not interested in developing brownfield sites. We maintain it is the Authority's role to protect greenbelt land and to take a strategic role in ensuring brownfield land is developed first. It is the Authority's role to put the community before the needs of developers to make profits. We do not believe brownfield land has been robustly explored as a development option – the Authority is much more responsive to developers than it is to residents comments as evidenced by their willingness to make modifications to the plan at the behest of housebuilders and developers whilst making no modifications in response to residents.

If the land on the brownfield register were used efficiently, it could support over 6,812 homes – well above government requirement for Sunderland

3. Green Belt and Exceptional circumstances**3.1**

We give evidence elsewhere in relation to housing need to the effect that we do not believe it has been proven or justified. But even if it were, housing need itself does not provide “exceptional circumstances”. There are no other claims within the Plan which constitute “exceptional circumstances”.

The housing densities used represent inefficient land use and result in houses more expensive than they need be, unaffordable houses not aimed at meeting need and excessive and unnecessary use of greenbelt land (J. Blundell evidence refers)

Sunderland has inappropriately used housing densities at <30homes/hectare. This is inefficient land use and means that houses would be more expensive than they need be. i.e they have excluded the issue of affordability. <30homes/hectare is equivalent to >£500,000 house prices ie unaffordable. This is also inefficient use of high value Green field/ Green belt.

There is no historic evidence that affordable housing in Sunderland has been achieved and using this density (<30/ha) there is no indication it will be, especially as Sunderland's aspiration only includes 15% affordable housing. Affordable starts and completions average 300/annum 2015-2018 against a total of 872 per/annum 2015-2018. (Chart 6.1 John Blundell refers) So there is an undersupply of affordable homes, and no plan to improve this. The houses being delivered are unaffordable for the people who need them.

4. Safeguarded Land**4.1, 4.2, 4.3**

Where safeguarded land is adjacent to proposed greenbelt deletions, it simply exacerbates the whole issue. And the reality is that developers will aggressively seek to build houses there before tackling brownfield sites. It is naïve to think that the pace of development will be effectively controlled once greenbelt protection is removed.

6. National Policy

6.1 We believe that if the policy allowed for development on the edge of settlements, settlement breaks would be eroded (as highlighted by Gateshead Council) and in the area of Springwell Village this would result in merging settlements and sprawl which would completely alter the character and setting of the village and the Bowes Railway Scheduled Ancient Monument.