

Hearing Statement - Matter 7 (South Sunderland)

# Sunderland Core Strategy and Development Plan

On behalf of Barratt David Wilson Homes (North East)(East of Washington: Washington Meadows)

April 2019





### I. Introduction

- I.I. This is a Hearing Statement prepared by Spawforths on behalf of Barratt David Wilson Homes (North East)(BDW) in respect of:
  - Matter 7: The Strategy and Growth Area for South Sunderland
- 1.2. BDW has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with BDW's comments upon the submission version of the Sunderland Core Strategy and Development Plan, dated July 2018.
- 1.4. BDW has also expressed a desire to attend and participate in Matter 7 of the Examination in Public.



## 2. Matter 7 – The Strategy and Growth Area for South Sunderland

Issue – This matter considers the strategic policy (SP5), the Port of Sunderland (SS5) and the South Sunderland Growth Area (SSGA) (SS6).

### **Strategic Policies**

- 1.1) Is Policy SP5 justified and effective?
- 2.1. BDW has no specific comment in relation to this issue.

### Port of Sunderland

- 2.1) Is Policy SS5 positively prepared, particularly in addressing issues of transport links and flood risk?
- 2.2. BDW has no specific comment in relation to this issue.

### **Identification of Sites and Protected Areas**

- 3.1) Does the SHLAA support the SSGA?
- 2.3. BDW has no specific comment in relation to this issue.



# 3.2) Is the configuration and scale of the SSGA sites justified taking into account development needs and the SHLAA and other assessments?

- 2.4. BDW support the principle of the SSGA, however considers that the Core Strategy should be clear about that which is expected to be delivered within the Plan period and hence which should be accounted for against the housing requirement.
- 2.5. BDW understand and support the need to allocate the entire area to allow for infrastructure provision, however as acknowledged in the trajectory in the SHLAA 2018 the whole site yield will not be entirely delivered within the Plan period.
- 2.6. BDW is therefore concerned that the approach portrayed does not fully address national guidance through the Framework and PPG.

3.3) Is the configuration of the settlement breaks justified?

2.7. BDW has no specific comment in relation to this issue.

### SSGA

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 sites would be acceptable?

2.8. BDW has no specific comment in relation to this issue.



- 4.2) Are all the policy requirements within Policy SS6 necessary and clear to the decision maker?
- 2.9. BDW has no specific comment in relation to this issue.
  - 4.3) Is the requirement for 10% of homes to be affordable justified?
- 2.10. BDW has no specific comment in relation to this issue.
  - 4.4) How does the South Sunderland Supplementary Planning Document (SPD) relate to Policy SS6?
- 2.11. BDW is concerned that there is an element of inconsistency between the SPD and the Core Strategy Policy SS6. This is explained further in response to Question 5.1.
  - 4.5) What is the up-to-date position in relation to planning permissions for the sites in the SSGA?
- 2.12. BDW understands the following in relation to the current position of the SSGA:

Site No.	Site Name	BDW Comments
062	Cherry Knowles	Only 304 houses have full planning approval. The rest is only outline. Condition 22 currently restricts the delivery of Cherry Knowle to 40 occupations prior to improvement of the Seaton Lane junction being complete. In order to bring forward the full scheme the Ryhope-Doxford Link Road (RDLR) is required, as are improvements to the Seaton Lane junction. The RDLR is dependent on HIF funding



081	Chapelgarth	Outline planning only for the 750 houses. No reserved matters submitted at present. Delivery reliant on RDLR, A19 and A690.
426A	Ryhope	Outline planning permission only. Delivery reliant on RDLR, A19 and A690.
477	Burdon Lane	No planning permission.

2.13. As can be seen from the planning position of the individual sites, all are dependent on the delivery of strategic road infrastructure and the majority only have outline planning permission with Burdon Lane the only one having no planning status. This emphasises the delivery issues with the SSGA.

#### **4.6)** Are the sites deliverable?

2.14. BDW supports the principle of the SSGA but considers that the delivery expectations for the scheme should reflect the potential actual delivery. BDW considers the proposed trajectory does not reflect the appropriate delivery of infrastructure to facilitate the proposed scheme.

### Infrastructure

- 5.1) Will the infrastructure to support the scale of development proposed in South Sunderland be provided in the right place and at the right time, including that related to transport, the highway network (particularly the Ryhope-Doxford Link Road), health, education and open space?
- 2.15. BDW is concerned that the infrastructure required for the delivery of SSGA may not be delivered at the appropriate time to deliver the number of homes indicated in the housing trajectory for the Plan. For instance, BDW's current approved development for Phase I of



Cherry Knowle for 304 houses is currently restricted to 20 houses prior to a scheme for Seaton Lane junction being agreed and 40 occupations prior to completion of the junction improvements. BDW has currently submitted a Section 73 Condition Variation to amend the later part of this condition this to 120 occupations, which is currently awaiting determination. BDW is aware that the traffic works to accommodate these units should take place this summer 2019, although this has not been formally confirmed by DCC. Nevertheless, this is still substantially short on delivery for the entire scheme due to the need for major infrastructure works being required to enable delivery of the wider SSGA.

- 2.16. BDW is also aware that Highway's England's response to recent planning permissions is to insist on a Grampian condition restricting delivery numbers on schemes until highway improvements have taken place.
- 2.17. BDW is aware that major works need to be undertaken on the A19 and A690 to facilitate the Story Homes, Persimmon and Taylor Wimpey elements of the scheme. These improvements require Housing Infrastructure Fund funding. The HIF programme is delayed and until an announcement is made by Government the funding for the improvement scheme is not secured and as such housing delivery is delayed and that source of funding cannot be relied upon.
- 2.18. BDW therefore is therefore concerned with the delivery trajectory for SSGA, which should be adjusted to reflect a more realistic approach to the delivery of infrastructure.

### Delivery

- 5.1) Are the assumptions about the rate of delivery of houses from sites in South Sunderland realistic (anticipated delivery is shown in Appendices A, F and N of the SHLAA)??
- 2.19. BDW is supportive of the South Sunderland Growth Area, but considers that the delivery of housing will potentially start in earnest later and be taken over a much longer period of time.



- 2.20. As explained earlier, BDW consider that with the infrastructure constraints and uncertainty over the funding and delivery timescales for the major infrastructure required to deliver the South Sunderland Growth Area the delivery rates in the Plan's housing trajectory are overly optimistic.
- 2.21. BDW **is also concerned** that the actual portrayal and expectations for housing delivery within the South Sunderland Growth Area has not been transposed accurately into the Core Strategy and Development Plan.
- 2.22. The South Sunderland Growth Area SPD shows that the estimated number of dwellings is 2,825 dwellings, whilst Policy SS6 states that the new neighbourhood will be approximately 3,000 dwellings.
- 2.23. Furthermore, the updated SHLAA 2018 suggests in the schedules in Appendix A that the sites which make up South Sunderland will create a total capacity of 2,955 dwellings of which only 2,165 dwellings will be delivered within the Plan Period by 2033 with the rest being delivered beyond Plan Period, whilst paragraph 4.61 states that delivery will be 2,285 dwellings in the plan period.
- 2.24. The table below comprises figures from the SHLAA 2018:

Site No.	Site Name	Capacity	Estimated Completions within Plan Period	Estimated Completions beyond Plan Period
062	Cherry Knowles	800	780	20
081	Chapelgarth	750	420	330
426A	Ryhope	450	290	160
477	Burdon Lane	955	675	280
	Total	2955	2165	790



- 2.25. BDW supports the principles of the South Sunderland Growth Area, however considers that the Core Strategy should be clear about that which is expected to be delivered within the Plan period and hence which should be accounted for against the housing requirement. BDW understand and support the need to allocate the entire area to allow for infrastructure provision, however as acknowledged in the trajectory in the SHLAA 2018 the whole site yield will not be entirely delivered within the Plan period.
- 2.26. Furthermore, BDW is concerned that delivery at SSGA will be slower than expected due to delivery of infrastructure and key junction improvements such as with the Seaton Lane junction which has cross boundary implications with Durham. It should be noted that BDW's current approved development for Phase I of Cherry Knowle for 304 houses is currently restricted to 20 houses until issues with the Seaton Lane junction can be addressed. This has major implications for delivery of the SSGA.
- 2.27. BDW understands that 2,165 dwellings is included in the SHLAA figure of 10,225. This approach needs to be clarified by the Council otherwise BDW is concerned that the Objectively Assessed Housing Need will not be achieved and therefore the Plan will not be in accordance with the Framework or PPG.
- 2.28. BDW therefore suggests the Plan needs to incorporate greater flexibility and further allocations elsewhere in the City, such as BDW's site at East of Washington (Washington Meadows) in case infrastructure provision hinders the delivery of the SSGA.

### **Proposed Change**

- 2.29. To overcome the objection and address soundness matters, the following changes are proposed:
  - Amend trajectory to reflect more appropriately the anticipated delivery of the SSGA.
  - Include greater flexibility in the Plan
  - Identify East of Washington (Washington Meadows) for housing in the short term.
  - Allocate at least a first phase of 150 to 750 houses at Washington Meadows.

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