Hearing Statement - Matter 7 (The Coalfield)

Sunderland Core Strategy and Development Plan

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

April 2019





I. Introduction

- 1.1. 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 Housing Growth Areas for The Coalfield
- 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 Housing Growth Areas for The Coalfield

Issue - 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.

Strategic Policies

1.1) Are Policies SP6 and SS7 justified and effective?

- 2.1. BDW consider that the general approach the Council has adopted through the above policies and their interaction with other policies and policy requirements in the plan could hinder the potential delivery of housing on the proposed allocations.
- 2.2. The proposed approach towards the housing allocations and other policy requirements could reduce the potential level of housing or even undermine the viability of schemes, hindering the delivery of sites in their entirety.
- 2.3. BDW is particularly concerned for instance with Policy H1 and once this is entwined with site specific requirements and the implications for schemes, in particular the need to deliver 10% of dwellings as accessible and adaptable homes.
- 2.4. BDW therefore consider a flexible approach be adopted through the plan and an increase in the housing requirement should be considered as part of the approach to ensure that the delivery of the OAN is achieved as a minimum.
- 2.5. BDW consider that the general approach the Council has adopted through the above policies and their interaction with other policies and policy requirements in the plan could hinder the potential delivery of housing on the proposed allocations



Identification of Sites

- 2.1) Do the Green Belt assessments support the HGAs The Coalfield and demonstrate exceptional circumstances for the removal of land from the Green Belt?
- 2.6. BDW has no specific comment in relation to this issue.
 - 2.2) If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?
- 2.7. BDW has no specific comment in relation to this issue.
 - 2.3) Are the configuration and scale of the HGAs justified taking into account development needs and the Green Belt assessments?
- 2.8. BDW has no specific comment in relation to this issue
 - 2.4) Are the configurations of the settlement breaks justified?
- 2.9. BDW has no specific comment in relation to this issue.

HGA9 - Penshaw

- 3.3) Is the site deliverable?
- 2.10. BDW has no specific comment in relation to this issue.



HGAI0 – New Herrington

4.3) Is the site deliverable?

2.11. BDW understands that there is no developer interest in the site. Therefore, at present there is no willing developer. Furthermore, the site is heavily constrained by Tree Preservation Orders and there are bats in the area. BDW therefore question whether the site can come forward in 3-4 years given the Club need to market the site and find a developer willing to overcome the site constraints and viability matters, especially as the deal will need to provide sufficient funds for the Club to relocate.

HGAII - Philadelphia

5.3) Is the site deliverable?

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

Infrastructure

- 6.1) Will the infrastructure to support the scale of development proposed in The Coalfield be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?
- 2.13. BDW has no specific comment in relation to this issue.
 - 6.2) Are the adverse impacts of the Central Section of the Coalfield Regeneration Route capable of being mitigated?



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

Delivery

- 7.1) Are the assumptions about the rate of delivery of houses from sites in The Coalfield realistic (anticipated delivery is shown in Appendices A, B, F and P of the SHLAA)?
- 2.15. As stated earlier, BDW question the potential delivery of the site given the constraints identified.
- 2.16. Notwithstanding the above, the constraints need to be overcome, the site is owned by the Club and therefore needs to be put to the market, legal agreements need to be drafted and agreed, planning permission needs to be granted, Section 106 Agreement needs to be negotiated, and conditions need to be discharged and the Club moved to a new facility and only then a developer can start on site.
- 2.17. BDW do not consider the site can come forward in 2024 years and is a much longer term opportunity.

Proposed Change

- 2.18. To overcome the objection and address soundness matters, the following changes are proposed:
 - Include greater flexibility within the Plan to account for the potential delay in delivery of proposed schemes.