

Hearing Statement – Matter 7 (Washington)

Sunderland Core Strategy and Development Plan

On behalf of Barratt David Wilson Homes (North
East) (North of High Usworth)

April 2019



I. Introduction

- I.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, Housing Growth Areas and Safeguarded Land for Washington
- I.2. BDW has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.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.
- I.4. BDW has also expressed a desire to attend and participate in Matter 7 of the Examination in Public.

2. Matter 7 – The Strategy, Housing Growth Areas and Safeguarded Land for Washington

Issue – This matter considers the strategic policies (SP3, SS2 and SS3) and the Housing Growth Areas (HGAI-HGA6) for Washington.

Strategic Policies

1.1) Are Policies SP3 and SS2 justified and effective?

- 2.1. BDW **supports** the identification of land to the North of High Usworth. However, as stated in earlier representations BDW is concerned with elements of Policy SS2.
- 2.2. Policy SS2 states that Washington Housing Growth Areas should focus on providing a mix of family housing, make provision or contribution towards education and healthcare and enhance access to local facilities and services.
- 2.3. BDW is supportive in principle towards providing family housing and mitigating the impacts of development, however with all the policy requirements in the Plan, the prescriptive approach should not undermine the viability of schemes. Flexibility should therefore be incorporated into the policy.
- 2.4. It is also unclear what the third stem of the policy is referring to “enhance access to local facilities and services”. This policy aim appears open ended and without evidence or justification. If this policy aspect is site specific it should only be included in site specific policy boxes. We would welcome clarity on this and a consideration by the Council of the viability implications on site deliverability, depending on what the Council means by ‘enhancing access to local facilities and services’.
- 2.5. BDW is concerned with the interaction of Policy SS2 and its specific housing mix references and Policy HI Housing Mix. BDW is supportive for providing a focus on family housing, however, the SHMA 2016 and the 2018 Addendum provides the evidence base for this

aspect of the policy and it is unclear from the available evidence how the need is derived. BDW recommend that a flexible approach is taken regarding housing mix, which recognises that need and demand will vary from area to area and site to site, ensure that the scheme is viable and provides an appropriate mix for the location. BDW is concerned once the other aspects of Policy HI are entwined with Policy SS2 and the implications for schemes, in particular the need to deliver 10% of dwellings as accessible and adaptable homes, which is discussed in more detail in response to Policy HI.

- 2.6. BDW, therefore, do not consider there is a need for any of the bullet points as these aspects are covered by other policies in the plan or national policy.

Identification of Sites

2.1) Do the Green Belt assessments support the HGAs and areas of Safeguarded Land in Washington and demonstrate exceptional circumstances for the removal of land from the Green Belt?

- 2.7. BDW support the conclusion that “exceptional circumstances” exist to warrant release of Green Belt as part of the Local Plan and also support the release of the site at North of High Usworth for housing.
- 2.8. It is evident from analysis of the site that it would not have a material impact on the Green Belt. The site is located within a highly sustainable location on the edge of Washington. It performs the logical extension of Washington’s urban area. The site’s development would clearly accord with the emphasis set out in the Framework, particularly concerning the need to make more efficient use of land.
- 2.9. Furthermore, the sites benefit from being located close to a range of services and facilities, including local shops, public houses, primary school and other community facilities. The site is also within walking distance to bus routes to Newcastle and Sunderland.
- 2.10. The Local Plan evidence base includes detailed assessments of land parcels to ensure that the most appropriate Green Belt releases are proposed. As part of that process, the Local

Plan proposes the release of North of High Usworth from the Green Belt (as site 567). BDW support the release of this site from the Green Belt.

- 2.11. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not lead to urban sprawl, result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town. The site effectively rounds off the Washington Urban Area with housing off Stone Cellar Road to the south and the Golf Course car park and housing to the east. The A194(M) is located to the west. The new Green Belt boundary will be defined by an existing wide tree belt along the northern edge of the site, which accords with the principles of the Framework. Therefore, although the site is in the Green Belt it is a logical scheme with significant major benefits.
- 2.12. The site therefore does not serve any Green Belt purpose and as such development for residential purposes would create a logical long term boundary to the Green Belt.
- 2.13. Furthermore, the site is a suitable Green Belt change, providing a more logical, robust and defensible green belt boundary for the future

2.2) If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?

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

2.3) Are the configuration and scale of the HGAs and areas of Safeguarded Land justified taking into account development needs and the Green Belt assessments?

- 2.15. BDW supports the release of sites in Washington for housing land and safeguarded land for long term development.

- 2.16. BDW considers that in accordance with the Spatial Strategy, Washington is a focus for growth. Washington is a sustainable settlement located on key transport corridors and with significant employment opportunities and growth areas nearby, particularly at IAMP. BDW considers that further housing should be brought forward at Washington to support the growth ambitions of Sunderland and enhance the economic benefits stemming from IAMP. At present, BDW considers there is insufficient housing focussed on Washington to take advantage of the economic growth ambitions generated by IAMP. This under provision could potentially undermine both the plan and the benefits from IAMP.

2.4) Is there any justification for the allocation of the safeguarded sites at this stage?

- 2.17. BDW supports the identification of safeguarded land. Similar to the response to Question 4.1 BDW supports the conclusion that “exceptional circumstances” exists to warrant release of Green Belt as part of the Local Plan for safeguarding for longer term development needs. The Framework states that in undertaking Green Belt reviews boundaries should be amended for the long term. Paragraph 139 states that Green Belt boundaries should “identify land between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period”.
- 2.18. However, BDW maintains their concern that flexibility needs to be incorporated into the plan and insufficient housing land has been identified. Furthermore, with the identification and progress at IAMP additional housing land needs to be identified in Washington. This will deliver the greater flexibility the plan requires along with delivering new housing alongside new employment creating an engine for growth that will deliver and support the growth ambitions of Sunderland.

HGA3 – North of High Usworth

5.1) 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 site would be acceptable?

- 2.19. BDW **support** the allocation of the site North of High Usworth. The site is available, suitable and achievable and therefore deliverable in accordance with the Framework.
- 2.20. A range of technical work has been undertaken, including transport, ecology, arboricultural, geo-environmental, noise, flood risk and drainage, heritage and masterplanning. Further survey work is also ongoing. An initial site masterplan is attached at Appendix I.
- 2.21. From the initial assessments there are no technical issues that would prevent development or are insurmountable. The site is therefore considered to be achievable and therefore deliverable in accordance with national guidance. The technical assessments are available if necessary and can be submitted upon request.
- 2.22. The Transport Statement for the site has been undertaken by Milestone Transport Planners and shows that the site is suitable for residential development. The main access into the site can be taken from Stone Cellar Road. It is considered that a safe and suitable access can be created into the site, and that the development would not have a significant detrimental impact on the local highways network. There is therefore no insurmountable constraint with regard to impact on local highways and access.
- 2.23. The site has good accessibility being in close proximity to the A195, A194(M), A184 and A1231 which provides routes towards Sunderland and Newcastle. The site also has good accessibility towards the A1 and A19 which provides connectivity to the north and south. The site is adjacent to a number of bus stops which provide access to routes, including towards Sunderland and Newcastle. The site is close to services and facilities, including schools, post office, and retail and employment opportunities.
- 2.24. There is no identified road traffic accident problem with the local network and it is reasonable to assume that the low level of additional use generated by the proposed development would not adversely impact on this situation.

- 2.25. In accordance with the Framework, the Transport Statement has demonstrated that:
- Sustainable transport modes are available to reduce the need for major transport infrastructure.
 - Safe and suitable access to the site can be achieved for all people and;
 - The impacts of the development are not significant and as a result, improvements are not required within the transport network
- 2.26. The Transport Statement has demonstrated that the development will have no material adverse impact on the local and wider highway system in terms of either capacity or safety.
- 2.27. The site falls within Flood Zone 1 and is not at risk from flooding. The drainage work has identified a drainage strategy for the site. It has confirmed the attenuation required on site and demonstrated the suitability of the area identified on the masterplan for this purpose.
- 2.28. Initial assessments show that the majority of the site is of low ecological value being a section of golf course and semi-improved grassland. The scheme represents an opportunity to achieve gains for biodiversity through environmental and ecological enhancement. The geo-environmental assessment, heritage assessment and noise survey have confirmed the suitability of the site to accommodate future development.
- 2.29. The site can therefore come forward and deliver housing in the short term.

5.2) Are all the policy requirements within HGA3 necessary and clear to the decision maker?

- 2.30. BDW maintain their original objection that the policy requirements are vague and that the evidence base does not justify the approach.
- 2.31. The approach appears to be fairly prescriptive and if applied rigidly could have implications for the site's delivery.
- 2.32. BDW is concerned about the following:
- Policy stem ii) create a new durable Green Belt boundary to the north.

2.33. No evidence or justification has been presented for this aspect of the policy. The northern boundary is defined by an existing wide tree belt and hedgerow, which is well defined and accords with national guidance on Green Belt boundary definitions. BDW do not consider this policy stem is required and should be removed.

2.34. BDW suggest the following wording for Policy stem ii): *trees to be retained along the Northern Boundary where possible.*

Policy stem iii) maintain wildlife and green infrastructure corridor west-east and limit impact to the area landscape character

2.35. It is unclear what east-west corridor is being referred to and where this location is within the site. No evidence or justification has been presented for this aspect of the policy.

2.36. BDW suggest the following wording for Policy stem iii): *ecological enhancement to be provided on site as appropriate, justified by an ecological assessment, of the site.*

Policy stem iv) retain existing screening of the site from north and west, including any additional buffers and acoustic barriers as necessary to address implications from the A194(M)

BDW has undertaken a Noise Assessment for the site which shows that noise is not a significant issue for the site. The Noise Assessment only recommends an acoustic barrier around the gardens of a number of properties and some enhanced glazing with the tree belt retained where possible.

BDW suggest the following wording for Policy stem iv): *retain as much of the existing tree belt boundary along the boundaries where possible.*

Policy stem v) retain all healthy trees and hedgerows and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality

2.37. No evidence or justification has been presented for this aspect of the policy. BDW has undertaken a full arboricultural survey and ecological survey of the site which identifies which trees and hedgerows can be removed and potential mitigation measures and

ecological enhancement measures. The terminology exceeds national guidance and the Councils own emerging policies.

- 2.38. BDW suggests the following wording for Policy stem v): *the site layout should have consideration for the retention of healthy trees wherever possible, unless there is clear justification for their removal, such as the creation of the site access.*

Policy stem vi) retain the southern edge of the site to provide amenity space and potential location for SuDS

- 2.39. BDW is concerned that this aspect of the policy is directing retention of specific trees and hedgerows and where potential open space should be located without evidence or justification being presented.

- 2.40. BDW suggests the following wording for Policy stem vi): *the site layout should be designed to incorporate usable public open space, where possible.*

Policy stem vii) be of high architectural quality and be designed with consideration of the village character to the south

- 2.41. This policy stem appears to overlap and repeat Policy HI on housing mix.

- 2.42. BDW pride themselves on high quality designed schemes, designed in accordance with Building for Life 12. The site layout will be well designed, as demonstrated by the draft masterplan.

- 2.43. BDW is concerned with all the criteria and requirements overlapping there could be implications for the scheme. The criteria are unnecessary as other policies both local and national address all matters. The only criteria necessary is that the site be allocated for housing.

- 2.44. BDW notes the correspondence and a potential proposed modification regarding the permissive footpath along the western boundary of the site. BDW is agreeable to retain, promote and upgrade the footpath within the boundary of the allocation. However, this can be considered further at planning application stage.

5.3) Is the site deliverable?

- 2.45. BDW considers that the site is deliverable. As stated in response to Question 5.1 the site has been fully assessed. BDW considers that the site at North of High Usworth is deliverable in the short term and will reinforce the housing supply and address the City's housing needs in the early periods of the Local Plan. The site is fully capable of being delivered in the next 5 years.

Infrastructure

9.1) Will the infrastructure to support the scale of development proposed in Washington be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?

- 2.46. BDW has undertaken significant assessments for its sites in Washington and the infrastructure is in place, or can be provided on site such as schools, for the schemes to come forward in an appropriate and timely manner.

Delivery

10.1) Are the assumptions about the rate of delivery of houses from sites in Washington realistic (anticipated delivery is shown in Appendices A, B, F and O of the SHLAA)?

- 2.47. BDW considers that the site at North of High Usworth (HGA3) is deliverable in the short term and is fully capable of being delivered in the next 5 years as shown in Appendix B.

Proposed Change

2.48. To overcome the objection and address soundness matters, the following changes are proposed:

- Incorporate the BDW suggestions in the representation above, or
- Remove Policy HGA3 stems ii to vii.

Appendix I: Site Masterplan



Private						
Code	Name	Storeys	Beds	Sqft	No.	Total Sqft
RO	Roseberry MID	2	2	679	4	2716
RO	Roseberry END	2	2	679	5	3395
MA	Maidstone MID	2	3	830	2	1660
MA	Maidstone END	2	3	830	7	5810
MO	Moresby	2	3	854	2	1708
DE	Derwent	2	3	907	7	6349
WI	Windermere	2	4	1074	7	7518
RI	Ripon	2	4	1120	5	5600
RA	Radleigh	2	4	1316	11	14476
	Total				50	49232

Affordable						
Code	Name	Storeys	Beds	Sqft	No.	Total Sqft
KE	Kenley	2	2	614	9	5526
	Total				9	5526

Total						
Code	Name	Storeys	Beds	Sqft	No.	Total Sqft
	Total				59	54758

	hectares	acres
approx gross area	3.34	8.25
approx nett area	1.75	3.76
coverage		14563