

Sunderland City Council Response to Matters, Issues & Questions

Matter 2 - Spatial Strategy and Related Policies

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?

In response to the Inspector's Preliminary Questions (EX1.005), the Council has proposed two modifications within the updated Schedule of Main Modifications (MM2 & MM3) to include tables showing the spatial distribution of development within the sub-areas. It is considered that these modifications will make the spatial distribution of development within the sub-areas clear within the Plan.

The spatial distribution of development in the Plan is considered justified and has been determined by the available land within the city, taking into consideration constraints such as highway capacities, physical site constraints and viability to ensure the most sustainable sites are brought forward, as set out in Compliance Statement (SD.66, paras. 6.110-6.121, pgs. 63-66).

The distribution of both employment and housing development utilises the most sustainable locations throughout the city and ensures new homes and employment opportunities are located in the right places to meet existing and future resident's needs.

1.2 Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?

The spatial distribution delivers a sustainable strategy for growth in the city having utilised the most sustainable locations for development in each of the sub-areas, therefore reducing the need to travel, distance travelled, and providing the opportunity for utilising alternative forms of transport including public transport, which will assist in reducing CO2 emissions and the impacts on climate change. The whole plan has been subject to a Sustainability Appraisal (SD.6) and as such the likely environmental and sustainability effects have been taken into consideration, which includes those associated with the proposed site allocations within the Plan.

2. The Split Between the Existing Urban Area and Elsewhere and Between Brownfield and Greenfield Land

2.1 Is the split between the Existing Urban Area and elsewhere and between brownfield and greenfield land clear from the Plan and justified?

Paragraph 4.22 of the Plan (SD.1; pg. 33), sets out how much of the housing supply can be delivered within the Existing Urban Area and paragraph 4.29 of the Plan (SD.1; pg. 34), sets out how many new dwellings are to be brought forward through the allocation of Green Belt sites and as such outside of the Existing Urban Area. However, it is acknowledged that this could be made clearer within the Plan and

therefore the Council have proposed a modification to paragraph 4.22 which is set out in the updated Schedule of Additional Modifications to make this split clearer (AM21).

2.2 Has the Plan robustly explored the effective use of brownfield land to meet development needs?

As set out in the Compliance Statement (SD.66; paras. 6.123-6.129; pgs. 66-67) and the SHLAA (SD.22; Table 1 pgs. 12-13; and paras. 4.46-4.53 pgs. 21-22) the use of brownfield land has been robustly explored and sites which are considered deliverable or developable have been fully assessed through the SHLAA process and included within the supply.

Whilst it is accepted that Whole Plan Viability Assessment for the Plan (SD.60), indicates that the city has challenging areas and brownfield sites will be difficult to deliver, sites of this nature have still been developed throughout the city and as such are relied upon to continuously deliver housing as part of the housing supply, with 44% of the deliverable SHLAA supply being on brownfield land.

In order to ensure that sites are used effectively, the SHLAA (SD.22 para. 4.25, pg. 17) considered the density of sites to maximise the amount of development. However, it was considered that this approach was not appropriate for the city's needs and did not reflect the SHMA due to the requirement for larger homes and bungalows (SD.66; paras. 8.82-8.83, pgs. 259-261).

2.3 Are there areas of brownfield land, including land identified as Key Employment Areas, that should be allocated for housing, taking into account employment land requirements and viability and deliverability issues?

The Council does not consider that there are additional areas of brownfield land, including land identified as Key Employment Areas (KEAs) that should be allocated for housing, taking into account employment land requirements and viability and deliverability issues.

The Council has sought to prioritise the development of brownfield land, with 44% of the deliverable SHLAA supply being on brownfield land. However, due to viability issues there remain a number of sites which could not be included within the deliverable supply for viability reasons.

Through the Employment Land Review (SD.37), the Council has already identified a number of former employment sites which are no longer required for employment purposes and where appropriate these have been included within the SHLAA (SD.22) as deliverable housing sites. However, the supply of employment land within the city is now becoming particularly tight (SD.66; paras. 9.20-9.24; pgs. 295-297) and therefore the Council does not consider it appropriate to release further existing employment areas for residential development, to ensure that there remains an adequate supply of employment land over the Plan period.

Notwithstanding this, it should be noted that flexibility is an inherent part of CSDP Policy EG2. This allows alternative uses to come forward on KEAs (such as housing) where criteria set out within the policy are met.

3. Green Belt and Exceptional Circumstances (Green Belt Alterations will also be Discussed in Relation to Housing Growth Areas During Week 2)

3.1 Has, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?

Paragraphs 4.19-4.28 of the Plan (SD.1, pgs. 33-34) explain in summary how the Council has explored all sustainable and viable options to maximise the amount of development within the urban area, optimising densities and ensuring that all land is appropriately used. This is explained in full detail in paragraphs 6.142-6.165 of the Compliance Statement (SD.66, pgs. 69-75) and by the Exceptional Circumstances for Releasing Land from the Green Belt paper (SD.33).

3.2 Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities?

It is considered that Sunderland's methodology for Green Belt assessment is consistent with neighbouring authorities.

South Tyneside Council and Sunderland Council have reviewed their Green Belt boundaries at similar time periods and worked closely on a consistent Green Belt approach. This was particularly important given the joint work that was being undertaken on the preparation of the IAMP AAP. This resulted in very similar and compatible approaches being undertaken with regard to the Green Belt Assessments in each area (SD.11; pgs. 22-23).

Gateshead Council's Green Belt assessment was carried out in 2014, prior to Sunderland's assessment commencing. This was a joint approach with Newcastle City Council. At a meeting between Sunderland and Gateshead Council's on 15/12/17 there was acknowledgement from Gateshead of Sunderland's Green Belt approach (SD.11; Appendix 2, meeting of 15/12/17). Overall, outstanding Green Belt issues between the two authorities focus principally on the potential impact of development on the strategic Green Belt gap between Washington and Gateshead.

Durham County Council and Sunderland City Council have held meetings that discussed each authority's Green Belt approach. In a duty to cooperate meeting between the two authorities in 2016, queries were raised relating to the Sunderland Green Belt methodology. To ensure that the approach was consistent with Durham's approach, further investigation took place, and a follow-up meeting in 2017 confirmed that the approach being undertaken by Sunderland raised no further concern with Durham County Council (SD.11; pg. 30).

4. The principle of safeguarded land being identified to meet longer-term development needs (Green Belt alterations will also be discussed in relation to Safeguarded Land during Week 2)

4.1 Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs?

The NPPF indicates that Green Belt should only be altered in exceptional circumstances, through the preparation or review of a Local Plan (paragraph 83). When revising Green Belt boundaries, the NPPF also indicates that local planning authorities should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. The third bullet point under paragraph 85 of the NPPF explains that, where necessary, the Local Planning Authority should identify 'safeguarded land' between the urban area and the Green Belt, in order to meet likely longer term strategic development needs beyond the Plan period. Taking into consideration the guidance within the Framework, the Council considers it necessary to safeguard land between the urban area and the Green Belt to meet longer-term development needs.

4.2 Has enough land been proposed for safeguarding to meet longer-term development needs?

The Council considers that sufficient land has been proposed for safeguarding and to meet longer-term development needs. It is considered that the scale of safeguarded land is appropriate, especially given that Council's must now review their Local Plans every five years. Furthermore, past experience has demonstrated that over the course of the 15-year Plan period, new sustainable sites may come forward for redevelopment within the urban area, which will provide additional supply without the need for further Green Belt encroachment.

4.3 In general terms is the safeguarded land in the right place to meet longer-term development needs?

As set out in paragraph 6.115 of the Compliance Statement (SD.66; pg. 64) Washington lies in a highly sustainable location, with excellent transport links and the strongest employment market in the city. However, development (particularly housing) has been constrained by Green Belt boundaries for many years, with just 652 homes built between 2007-2015. Even accounting for the 6 HGA sites in the Washington sub-area, proposed residential development over the Plan period in this area is much lower than elsewhere in the city. Furthermore, the SHMA has identified a need in the city for larger family detached houses and Washington is considered to have the right housing market for this type of housing (SD.66; paras. 8.82-8.83, pgs. 259-261). Therefore, in locational terms, the 2 safeguarded sites are most appropriately located within the Washington sub-area, where demand is highest and future land supply is most constrained.

By contrast, other areas proposed by consultees for safeguarding lie within South Sunderland and the Coalfield area –both of which are areas which have sufficient housing land supply for significant levels of housing growth. Of all homes identified in the SHLAA (May 2019 Update), 41% are located in South Sunderland and a

further 29% within the Coalfield. In general terms, any additional land allocations in these areas would need to be considered very carefully in terms of the potential for housing market saturation, as well as significant impacts to infrastructure and the environment.

The boundary alterations proposed for these 2 sites are also considered to be appropriate, ensuring the permanence of the new Green Belt boundary in accordance with the NPPF (explained in greater detail in paragraphs 6.378-6.382 of the Compliance Statement – SD.66, pgs.142-143). Other sites have been put forward for safeguarding by landowners and developers, but these are not supported by the Council (the reasons for which are explained in paragraph 6.389 of the Compliance Statement (SD.66; pgs.145-147).

5. The Principle of ‘Settlement Breaks’ and the Terms of Policy NE7

5.1 Does the evidence base and, in particular SD.48, support the principle and general extent of the settlement breaks?

The Compliance Statement (SD.66; paras. 6.175–6.179 and 12.172-12.178; pgs. 78 and 440-443) and Settlement Break Review (SD.48) provide a full justification for the principle and configuration of Settlement Breaks. Specifically, Sections 1 and 3 of the Settlement Break Report (SD.48, pgs. 2-4 and 7) explain the history of Settlement Break, together with their purpose and extent. The Settlement Break is divided up into 16 sections, together with an additional section outlining proposed land additions and minor boundary alterations (SD.48; pgs.11-173). The Settlement Break Review (SD.48) has enabled critical analysis to take place and to create a new strong and defensible Settlement Break boundary that will endure over the Plan period.

5.2 Are the provisions of Policy NE7 justified and consistent with national policy or are they too restrictive?

Settlement Breaks (by virtue of their role as Green Infrastructure corridors) are consistent with Section 11 of the NPPF which seeks to conserve and enhance natural environments. More specifically, NPPF paragraph 114 states that Local Plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and Green Infrastructure, and paragraph 99 further states that Local Plans should take account of climate change over the longer term...including through the planning of Green Infrastructure. Settlement Breaks (forming Green Infrastructure) are also in line with latest Government policy, such as the 25 Year Plan for the Environment.

The Council considers that the policy is positively prepared and effective and allows (in Part 2 of the Policy) for some forms of development to take place. Since 2013, the Settlement Break Review has also identified the loss of 35% of Settlement Break land, much of which has been allocated (and developed) for housing. Settlement Breaks represent a long-standing policy of open countryside around some of our built-up areas- they have worked well to help focus development in urban areas and support the retention of the city’s Green Infrastructure corridors. Public consultation has demonstrated support for Settlement Break retention by local residents and by

countryside groups. Without the Settlement Break policy in place, pressure for Settlement Break release for development would have increased further, potentially merging settlements, impacting further on the remaining sensitive environmental areas and creating development in less sustainable locations.

Developers have recommended that a more positive policy approach be adopted to support development on potential development sites which are sustainable and/or if a 5-year housing land supply cannot be proven. As with Policy NE8, the Council considers that there is a sufficient housing supply for the Plan period and the housing trajectory (SD.1; Figure 34; pg. 58) demonstrates that a 5-year supply can be maintained throughout this period. Nevertheless, if a shortfall did occur, a number of measures are in place to rectify this (SD.1; para. 6.9; pg. 58). Furthermore, Local Authorities must now review their Local Plans every five years. It is therefore considered that this would provide the opportunity to look at land supply again if necessary.

6. Whether Policy NE8 is Consistent with National Policy

6.1 Is Policy NE8 consistent with paragraphs 17 and 109 of the Framework?

Policy NE8 supports the core planning principles (outlined in paragraph 17 of the NPPF) which adhere to the principles of sustainable development (as outlined in paragraphs 7,8 and 9 of the NPPF). To reiterate, sustainable development is based on 3 dimensions: economic, social and environmental. Each strand should be considered equal and inter-dependent and mutually supportive of each other. Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life.

In light of this, the Council has examined the city's open countryside in the Strategic Land Review (SP.18, see references 859, 860 and 861), and this demonstrates that these areas are remote and rural, and subject to numerous physical and environmental constraints/features. These features help to create an overall area of higher landscape value and provide quality wildlife/Green Infrastructure corridors. They represent the least sustainable development areas in the city.

In contrast to paragraphs 17 and 109 of the NPPF (and in relation to the supply of sustainable development sites put forward by this Plan), these areas of Open Countryside:

- Have less scope to produce thriving local places and support the vitality of main urban areas;
- Are more likely to impact negatively on the intrinsic character and beauty of the countryside, and on biodiversity and valued landscapes;
- Are less likely to support public transport services; and
- Are less likely to enhance the natural environment and to avoid land of lesser environmental value.

6.2 Is the Plan clear as to areas of 'valued landscape' and are these areas justified?

The Council has proposed a modification to the supporting text to the policy through the updated Schedule of Main Modifications (MM40) to cross reference to the Sunderland Landscape Character Assessment (LCA) (SP.47). The text also clarifies that areas identified for 'landscape protection' are classed as high landscape areas, and that these are considered to represent valued landscapes, as set out within the NPPF.

Paragraphs 1.13-1.14 (pg. 11) and Appendix 1 of the Sunderland LCA (SP.47) clarifies the approach undertaken to determine 'valued landscapes' in the city. For each character area, features of particular value are identified and an evaluation of landscape value has been made. This is based on generic criteria for judging landscape value presented in the 3rd edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). In each case, a judgement has been made as to whether the overarching strategy for each character area is based around *landscape protection* or *landscape enhancement* (or in some cases a combination of the two) as defined in the European Landscape Convention.

The areas where the strategy is aimed at *landscape protection* equate to the areas of higher landscape value within the city, and these are identified in Figure 3.2 of the Sunderland LCA (SP.47; pg.11). Other features and designations indicating locally valued landscapes include key open spaces and parks, nature reserves and conservation areas. These are shown alongside the landscape strategies in Figure 3.2 of the Sunderland LCA.

The Sunderland Landscape Character Assessment contributes to the aims of national planning policy by:

- Providing reliable evidence of the intrinsic character of the landscape, including its historical aspects;
- Highlighting the features of the landscape, including those of the Heritage Coast, which are valued and are worthy of conservation or enhancement;
- Highlighting aspects of the landscape which are sensitive to changes in the landscape; and
- Providing justification for the selection of areas which could be protected for their landscape significance.

6.3 Should Policy NE8 allow for development sustainably located on the edge of settlements, particularly where there is a lack of a 5-year housing land supply?

It is not considered that this policy would be appropriate within Sunderland and premature within the context of the revised NPPF. The Council considers that there is a sufficient housing land supply for the 15-year Plan period and the housing trajectory (as set out in Figure 34 of the Plan - SD.1; pg. 58) demonstrates that a 5-year supply can be maintained throughout this period. Nevertheless, if a shortfall did occur, a number of measures are identified to rectify this (paragraph 6.9 of the Plan - SD.1; pg. 58).

Furthermore, Local Authorities must now review their Local Plans every five years, and at such a time, a review of the OAHN can be undertaken, which if altered, could significantly impact on the city's housing needs (which could not be predicted at present). Past experience has also consistently demonstrated that over the course of the 15-year plan period, there will inevitably be new sustainable sites coming forward for redevelopment within the urban area and on brownfield land. These sites should be considered before any relaxing of greenfield sites takes place.

The Strategic Land Review (SP.18, references 859, 860 and 861) demonstrates that the open countryside areas identified through Policy NE8 tend to represent remote and rural areas, that are subject to numerous physical and environmental constraints/features. This indicates that they represent the least sustainable development areas in the city.

Any proposal to release land in the Open Countryside once a 5-year housing land supply could not be proven, would be contrary to the NPPF as it would prioritise the less sustainable development sites in the city potentially ahead of a Plan review and a comprehensive review of potential development sites, which it is likely would identify other more appropriate and sustainable development sites.