

SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN EXAMINATION

The Strategy and Growth Area of South Sunderland

Response to Inspectors' Matters, Issues and Questions

Made on Behalf of the Church Commissioners of England

Matter 2 - Spatial Strategy and Related Policies

Introduction

- 2.1 Our Client has a land interest at South Ryhope. Representations have been made to each stage of the plan making process which have supported the proposed allocation of South Ryhope for residential-led development as part of the South Sunderland Growth Area (SSGA) (referred to as Phase 1). Representations have also been made to support the release of Green Belt land immediately to the south of this draft allocation for further residential development (referred to as Phase 2). The development of both parcels of land would provide a suitable and sustainable location to deliver up to 615 dwellings, a local centre and associated public open space.
- 2.2 Phase 1 is a draft allocation and benefits from planning permission which was granted in September 2017 for up to 450 dwellings and a local centre. Phase 1 has been marketed and a preferred housebuilder selected.
- 2.3 Phase 2 extends to 15.62ha; it remains within the Green Belt and is located immediately south of Phase 1. There is no physical delineation between the two. Ryhope Dene runs partly through the southern boundary, with trees located alongside. This provides a physical and defensible boundary to the remainder of the Green Belt to the south.
- 2.4 Representations made by our Client have been accompanied by technical work demonstrating the suitability of the Site and an Illustrative Masterplan has also been provided setting out how development within Phase 2 could come forward.

Issue 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?

- 2.5 Figure 9 of the Plan sets out the expected distribution of housing growth across the city during the Plan Period.

2.6 Our Client broadly supports the spatial distribution and in particular that the majority of new housing development is directed towards South Sunderland. The SHLAA provides justification and identifies the distribution of deliverable and developable land supply across the five sub-areas, which is in-line with the spatial distribution proposed within the Plan.

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

2.7 Our Client does not wish to make written representations to this question.

Issue 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?

2.8 Our Client does not wish to make written representations to this question.

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

2.9 Our Client does not wish to make written representations to this question.

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?

2.10 Our Client does not wish to make written representations to this question.

Issue 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?

2.11 Exceptional circumstances have been demonstrated for the alteration of Green Belt boundaries and a robust justification is set out within Part 1 of the Green Belt Review (SD33).

2.12 It has been demonstrated that additional housing allocations are required to meet the OAN and prior to releasing Green Belt, all alternatives to Green Belt release have been assessed. The Council has assessed all available and viable brownfield land and residential densities have been maximised. It can therefore be concluded that the identified housing targets and strategic corporate objectives cannot be achieved without the release of Green Belt land.

2.13 Whilst our Client supports the Council's approach for releasing Green Belt, they consider that the Council has incorrectly identified some of the sites which are to be removed from the Green Belt and allocated for residential development.

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

2.14 National Planning Policy sets out the tests for releasing Green Belt land. There is no set methodology and no requirement for methodologies of adjoining authorities to be "reasonably consistent" with one another.

2.15 Paragraph 85 sets out that when defining boundaries, local planning authorities should:

- *"Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *Not include land which it is unnecessary to keep permanently open;*
- *Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposed the development;*
- *Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period;*
- *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".*

2.16 Paragraph 80 of the NPPF sets out the five purposes of the Green Belt. The Council's methodology assesses Green Belt parcels against these purposes and scores them against different criteria along with whether they are affected by fundamental constraints. Sites not deemed to have a major impact to Green Belt purpose and not significantly affected by designations were then considered as part of the Site Selection process.

2.17 The Council proposes to allocate seven sites which are currently within the Green Belt for residential development.

2.18 Phase 2 of our Client's site was initially taken into consideration within the 'Green Belt Review Stage 1 Core Strategy Growth Options Stage' (2016) under the reference BU12. The

purpose of the report was to identify parcels of land which were fundamental to the purposes of the Green Belt and those which could be taken into further consideration for removal as part of a Stage 2 report.

- 2.19 Our Client's site was considered suitable for further consideration as part of the Stage 2 Report.
- 2.20 Since this time, the Council has reassessed the Site as part of the 'Green Belt assessment Stage 1 and Updated Stage 2, 2017' which was published in support of the Publication Draft consultation.
- 2.21 As part of this revised assessment, the Site has now been discounted at 'Stage 1'. No information has been provided by the Council to justify this change in position.
- 2.22 We agree with the way in which the Green Belt Review has been conducted in terms of assessing sites against the five purposes of the Green Belt however disagree with the findings.
- 2.23 Table 1 below sets out the contribution of the Site without and with the Phase 1 development. The Council's 2016 and 2017 scores are included for reference which show that there been no change to the score against the 'five purposes' despite the Site now being discounted at the Stage 1 Green Belt assessment.
- 2.24 Notwithstanding this, the contribution which Phase 2 of our Client's site provides to the five purposes of the Green Belt has been incorrectly assessed by the Council. Previous representations on behalf of our Client have included a full Green Belt Assessment and Landscape Visual Impact Assessment. The results of this are presented in Table 1 below.

Table 1: Assessment of the Site Against the Five Purposes of the Green Belt

Purpose	Existing Baseline (Barton Willmore Assessment)	Future Baseline (Barton Willmore Assessment)	SCC Green Belt Review 2016	SCC Green Belt Review 2017
Check the unrestricted sprawl of large built-up areas	Some/Limited	Limited	Major overall adverse impact	Major overall adverse impact
Prevent neighbouring towns from merging	Limited	Limited/None	Moderate overall adverse impact/some mitigation feasible	Moderate overall adverse impact/some mitigation feasible
Assist in safeguarding the countryside from encroachment	Some	Some/Limited	Major overall adverse impact	Major overall adverse impact
Preserve the setting and special character of historic towns	None	None	Zero	Zero
Assist in urban regeneration	Same contribution as any other land parcel within the Green Belt	Same contribution as any other land parcel within the Green Belt	Greenfield land in open countryside	Greenfield land in open countryside

2.25 In summary, we consider that the Council’s methodology for assessing Green Belt boundaries to be consistent with the NPPF and therefore appropriate. It is consistent with neighbouring authorities in that it complies with National Planning Policy and assesses sites against the purposes of the Green Belt. However, there are flaws within the assessment itself and the Council are not justified in their approach for discounting our Client’s Site.

Issue 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?

2.26 The Plan identifies safeguarded land under Policy SS3. The policy justification explains the reason for this being safeguarded and confirms that the Council has *“identified Safeguarded Land in order to provide a degree of permanence to the Green Belt boundaries in the longer term, so that they should be capable of enduring beyond the Plan Period”*.

2.27 We agree that safeguarded land is required to meet longer-term development needs and this is in-line with paragraph 83 of the NPPF which requires that at the time of review of Green Belt boundaries, authorities should have regard to their intended permanence in the long term, so they should be capable of enduring beyond the plan period.

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

2.28 Our Client does not consider that enough land has been proposed for safeguarding to meet longer-term development needs.

2.29 Land East of Washington and land South of East Springwell has been removed from the Green Belt and designated as Safeguarded Land. This comprises approximately 100ha of land to east of Washington and to the west of the International Advanced Manufacturing Park.

2.30 Whilst our Client does not have specific objections to the allocation of this parcel of land as Safeguarded Land, they do not consider that one parcel is sufficient to meet longer-term development needs beyond the plan period.

2.31 Our Client is concerned that the allocation of a single large parcel of land may prejudice the delivery of housing should there be any deliverability issues associated with the site. Should the parcel of land not be developable in the future then Green Belt boundaries would need reviewing again to release additional land. Clearly it would therefore be prudent to allocate additional safeguarded land to ensure that Green Belt boundaries can endure beyond the plan period.

2.32 Phase 2 of our Client’s Site at Ryhope is suitable, available and deliverable and could be released from the Green Belt for future housing growth.

- 2.33 A brief background to our Client's Site is provided within the introduction of these Matter Statements and detailed representations have been made at each stage of the plan making process.
- 2.34 Phase 1 of our Client's Site benefits from planning permission and is a draft allocation. Once this phase has been developed, the contribution that Phase 2 would make to the purposes of the Green Belt would be comparatively less than the existing baseline scenario. Phase 2 is not considered to contribute to the 'five purposes' of the Green Belt and should be removed and allocated for residential development. This approach would accord with draft Policy SS6 in delivering "*approximately 3,000 dwellings*" within the SSGA.
- 2.35 Alternatively, the Phase 2 site would be appropriate for allocation as safeguarded land. This would provide additional flexibility to housing delivery and ensure the Council's long-term housing need is maintained.

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

- 2.36 To ensure longer-term development needs, additional safeguarded land should also be included in the south of Sunderland. The reliance of one large parcel of safeguarded land in the north of Sunderland is not sufficient to meet longer-term development needs.

Issue 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?

- 2.37 Our Client does not wish to make written representations to this question.

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

- 2.38 Our Client does not wish to make written representations to this question.

Issue 6: Whether Policy NE8 is consistent with national policy.

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

- 2.39 Our Client does not wish to make written representations to this question.

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

- 2.40 Our Client does not consider the Plan to be clear as to the areas of 'valued landscape'.

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?

2.41 Our Client does not wish to make written representations to this question.