

**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 for England**

**Matter 7 - The Strategy and Strategic Policies for South Sunderland**

**Introduction**

- 7.1 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.
- 7.2 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.
- 7.3 Phase 2 extends to 15.62ha and is capable of accommodating circa 144 dwellings and increasing the development capacity of Phase 1 to 471 dwellings; 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.
- 7.4 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: Strategic Policies****1.1 *Is Policy SP5 justified and effective?***

- 7.5 Policy SP5 is justified and effective. The Policy sets out the spatial priorities for South Sunderland. Part (2) of the Policy states that *“South Sunderland Growth Area (Policy SS6) is allocated as a new sustainable community”*.
- 7.6 The SSGA has been identified as a potential strategic growth area for housing for a number of years. The remainder of this matter demonstrates how the SSGA is justified by evidence and suitable for allocation.
- 7.7 The SSGA includes four sites, three of which benefit from planning permission and are fundamental to the delivery of Sunderland’s housing requirement.

**Issue 2: Port of Sunderland****2.1 *Is Policy SS5 positively prepared, particularly in addressing issues of transport links and flood risk?***

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

**Issue 3: Identification of Sites and Protected Areas****3.1 *Does the SHLAA support the SSGA?***

- 7.9 The SHMA identifies a need to provide housing stock to meet demand and household aspirations to help to stem the net out-migration which Sunderland is experiencing. It identifies a particular need for more executive housing and larger family dwellings within the city.
- 7.10 The SHLAA identifies potential housing sites across the city to meet this need, along with their potential capacities. Sites are sub-divided into the five sub-areas of Sunderland North, Washington, Sunderland South, Urban Core and the Coalfield.
- 7.11 Sites have been assessed within the SHLAA based on their availability, suitability, achievability and deliverability for residential development. Following an assessment of all sites, the development potential has been collected to produce an indicative housing trajectory. This sets out how much housing can be provided, and at what point in the future. Table 10 of the 2018 SHLAA identifies the distribution of deliverable and developable land supply across the five sub-areas, which shows that the majority of land supply is located in South Sunderland.
- 7.12 The South Sunderland sub-area has been assessed within the SHLAA. Three of the sites have planning permission and so identified as suitable, available, achievable and deliverable. The

remaining site (SHLAA site 477) has been identified in the SHLAA as suitable, available, achievable and developable.

- 7.13 It can therefore be concluded that the SHLAA does support the SSGA and housing delivery in this area has a key role in meeting housing demand. The SSGA will provide new housing that extends the current housing offer in the city and provides housing options that are not currently available.

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

- 7.14 The configuration and scale of the SSGA sites are justified. As discussed within question 3.1 above, the SHMA and SHLAA identify a need to provide additional housing to meet the identified need in Sunderland.
- 7.15 The SSGA has been identified as a potential strategic growth area for housing for a number of years and the sites within the SSGA are fundamental to the delivery of the housing requirement.
- 7.16 The SHLAA assesses each of the site's suitability and the scale of development which could be delivered on the sites within the SSGA and three of the sites benefit from planning permission. The scale and configuration of the sites fully takes account of their constraints and opportunities.
- 7.17 The SSGA allocation has been supported by significant background and technical evidence to ensure that the four sites come forward in a holistic manner and deliver all necessary supporting facilities and infrastructure.
- 7.18 Development needs arising from the additional housing provision has been fully justified within the Infrastructure Delivery Study (SP24) and the associated Viability Study (SP25). The Study establishes a baseline position in respect of issues including the overall pattern and volume of development proposed within the SSGA and identifies the requirements, quantum and phasing of infrastructure associated with the sites. This is discussed in greater detail under question 5.1 below.
- 7.19 Our Client's Phase 1 site referred to as 'South Ryhope' will accommodate 450 dwellings, a local centre including up to 500sq.m of floorspace, earthworks to facilitate surface and foul water drainage, structural landscaping and formal and informal open space.
- 7.20 Our representations have identified that Phase 2 of the site should be released from the Green belt. The linear park which runs through Phase 1 could be extended into Phase 2 and form part of the buffer from the Dene. Further areas of incidental open space and LEAP could

also be included within Phase 2. The central parcel of the site could be constructed at a medium density of 34 dwellings per hectare and the remaining parcels adjoining the Dene, attenuation pond and open space would be at a low 20 dwellings per hectare.

- 7.21 The allocation of Phase 2 will ensure delivery of further housing in a sustainable location and help to contribute towards the 3,000 dwelling target within Policy SS6.

***3.3 Is the configuration of the settlement breaks justified?***

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

**Issue 4: SSGA**

- 7.23 ***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?***

- 7.24 The SSGA has been assessed through the SHLAA and Sustainability Appraisal.

- 7.25 Our Client's site forms part of the SSGA and has been granted planning consent. Landscape, heritage, biodiversity, access, transport, drainage and other constraints have therefore been considered in detail and in determining the planning application, the Officer found there to be no conflict with local or national planning policy, or any adverse impacts that would significantly and demonstrably outweigh the benefits of the development proposal.

- 7.26 There are also two additional planning permissions within the SSGA, demonstrating that development of these sites would also be acceptable.

- 7.27 We have submitted representations seeking the removal of Phase 2 of our Client's site from the Green Belt and including this parcel of land within the SSGA. Any constraints associated with Phase 2 are capable of being mitigated and development of the site would be acceptable.

- 7.28 The SHLAA identifies a number of constraints associated with Phase 2. These constraints are however the same constraints identified for Phase 1, although given the work undertaken for the planning application for Phase 1, it is recognised that these constraints can be mitigated. Phase 2 is immediately south of Phase 1 and would also be capable of mitigating the constraints identified.

- 7.29 The only reason for Phase 2 of the site not being suitable for development is therefore due to its Green Belt designation. Our previous representations and our response to question 3.2 of Matter 2 provide justification as to why the site should be released from the Green Belt.

- 7.30 An indicative masterplan for Phases 1 and 2 has been submitted with our representations which shows how the sites could be comprehensively planned. It includes enlargement of the attenuation basin approved as part of Phase 1 and vehicular access can be suitably accommodated from Phase 1.
- 7.31 A full Landscape Visual Impact Assessment has also been undertaken for Phase 2, which has been submitted with our representations. A series of design considerations have been identified as a result of this and these are incorporated into the draft masterplan.

***4.2 Are all the policy requirements within Policy SS6 necessary and clear to the decision maker?***

- 7.32 Policy SS6 provides a number of requirements for the SSGA. A number of these are necessary and clear, including:
1. Approximately 3,000 new homes;
  2. 10% affordable housing;
  3. A new primary school and extensions to two existing schools;
  4. A local centre;
  5. Community/cultural facilities;
  9. The completion of the Ryhope-Doxford Link Road.
- 7.33 Criteria 6, 7 and 8 of the Policy require “large expanses of public open space”, “woodlands” and “cycleways and footpaths”. These criteria are not clear, and we do not consider them necessary. The provision of public open space and woodland is required (where relevant) under Policies NE3 and NE4 of the Core Strategy and Policy NE1 sets out how the Green Infrastructure Network will be enhanced by *inter alia* linking walking and cycle routes to and through corridors where appropriate. Given these requirements are provided in other development management policies we do not consider them to be necessary within Policy SS6.

***4.3 Is the requirement for 10% of homes to be affordable justified?***

- 7.34 Delivery of the SSGA will require significant infrastructure delivery. The Infrastructure Delivery Study (SP24) and viability assessment (SP25) support the SSGA allocation and identify that increasing the affordable housing requirement beyond 10% would threaten viability.

7.35 Three of the four sites within the SSGA have planning permission and agreed to a contribution of 10% affordable housing, thus demonstrating further that the 10% requirement is justified.

***4.4 How does the South Sunderland Supplementary Planning Document (SPD) relate to Policy SS6?***

7.36 The South Sunderland Growth Area SPD is being prepared by the Council and once adopted, development within the SSGA is required to be in accordance with this document.

7.37 This is noted within the justification text to Policy SS6 however not within the Policy itself. Our Client therefore suggests that reference is made within the Policy.

***4.5 What is the up-to-date position in relation to planning permissions for the sites in the SSGA?***

7.38 Phase 1 of our Client's site is allocated at draft Policy SS6 as part of the SSGA. Our Client's site forms the eastern-most component of the SSGA, referred to as 'South Ryhope'.

7.39 An application was submitted by our Client in August 2016 and granted planning permission in September 2017 for the following:

**"Outline planning application with two means of vehicular access from A1018 (Saint-Nazaire Way) to be determined (all other matters reserved for subsequent approval), for the erection of up to 450 dwellings (Class C3); local centre including up to 500sq.m of floorspace (Class A1, A2, A3, A4, A5, C3, D1 or D2); earthworks to facilitate surface and foul water drainage; structural landscaping; formal and informal open space; car parking; site remediation; and all other ancillary and enabling works".**

7.40 The Site is now being marketed to potential housebuilders and developers.

***4.6 Are the sites deliverable?***

7.41 It has been identified that the sites within the SSGA are deliverable. In respect of our Client's site, the principle of housing has been agreed on the site and outline consent approved. The site is being marketed by our Client to prospective housebuilders and the site could start to deliver from 2020/2021.

7.42 Policy SS6 identifies capacity for approximately 3,000 new homes. Paragraph 4.1 goes on to explain that only 2,285 dwellings will be delivered over the plan period. Our Client does not

raise any objections to this as it will provide additional flexibility towards housing delivery over the plan period. Indeed, given the constraint which the Green Belt places on housing delivery, it is considered wholly appropriate to include sites which will deliver beyond the plan period.

7.43 With this in mind, it would be prudent to also allocate Phase 2 of our Client's site as part of the SSGA within the Core Strategy.

### **Issue 5: Infrastructure**

#### ***5.1 Will the infrastructure to support the scale of development***

7.44 The SSGA has been supported by significant background and technical evidence to ensure that the four sites come forward in a holistic manner and deliver all necessary supporting facilities and infrastructure.

7.45 An Infrastructure Delivery Study (SP24) and Viability Assessment (SP25) support the SSGA. Significant infrastructure is required to support the SSGA however documents SP24 and SP25 identify that due to the scale of the SSGA the required infrastructure can be supported by the development.

7.46 New infrastructure required includes:

- Affordable housing;
- A new primary school and extensions to existing primary schools;
- Local centre;
- Leisure and communal facilities;
- Over 50ha of greenspace;
- Allotments;
- Biodiversity mitigation;
- Subsidised buses;
- New cycleways and footpaths; and
- The completion of the Ryhope Doxford Link Road.

7.47 The following mitigation has been secured as part of the completed Section 106 Agreement for Phase 1 of our Client's Site:

- Funding towards existing and proposed allotment plots;
- Contribution to off-set the scheme's impact on local biodiversity;
- Contribution towards the extension of two existing primary schools and the development of a new 1.5 form entry primary school;
- Contribution to facilitate the construction of the proposed Ryhope to Doxford link road;
- Contribution towards the implementation of the strategic access management measures to suitably mitigate the scheme's impact on the SPA;
- Financial contribution towards bus links to service the development; and
- Contribution towards one multipurpose pitch and one 3G artificial turf pitch.

7.48 Draft Policy SS6 states at approximately 3,000 dwellings will be delivered in the SSGA. The Infrastructure Delivery Study bases the assessment upon up to 3,300 dwellings. Inclusion of Phase 2 of our Client's site within the SSGA would provide a further 144 dwellings which is not likely to undermine the infrastructure requirements of the SSGA and could contribute further to the new infrastructure provision.