

GEORGE F. WHITE



SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN EXAMINATION

Response to Inspector's Matters, Issues and Questions for the Examination and Hearing Sessions

Prepared on behalf of Mr A. Carr in relation to land at Tunstall Poultry Farm, Ryhope, SR2 OBF

CLIENT NAME	Mr A Carr
CLIENT REFERENCE	NCL400076
DATE	May 2019
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INTRODUCTION

- 1.1 George F. White (Planning and Development) have been instructed by Mr Carr (the 'Client') to submit representations on his behalf to the Inspector's Matters, Issues and Questions for the Examination and Hearing sessions of the Sunderland Core Strategy and Development Plan Examination.
- 1.2 We would like to be kept informed and notified about the progression of the Examination by way of email (naomiteasdale@georgefwhite.co.uk).

BACKGROUND

- 2.1 Our Client has a land interest in 3.55ha of partly previously developed land, located at Tunstall Poultry Farm, Ryhope SR2 0BF; ('the site') is shown below and on the plan at Appendix A. The site is located to the west of Ryhope and south of Ryhope Colliery and lies to the south of the Road known as Eltham Road. The site forms part of the SHLAA site assessment ref 477 – Land North of Burdon Lane.
- 2.2 The site is wholly contained within the land identified as the proposed Strategic Site Policy, known as the South Sunderland Growth Area (SSGA) and has been allocated for residential purposes as part of a wider allocation known as land north of Burdon Lane whereby a consortium of willing house builders are on board to deliver 955 units.
- 2.3 Our Client is promoting development of their land and has already had interest from a number of national developers. Once the Local Plan is adopted, a delivery contract will be formalised and planning sought. It is worth noting that the site is within single ownership with direct access to the highway which will ultimately improve the deliverability of the site through wider variety of housing and different type of housing from the wider allocated site.



Figure 1: Site Location Plan

REPRESENTATIONS

- 3.1 The following representations are made to the Inspector's Matters, Issues and Questions for the Examination and Hearing sessions of the Sunderland Core Strategy and Development Plan Examination.
- 3.2 Comments are provided in response to Session 11, Matter 7, The Strategy and Growth Area for South Sunderland and we will seek to address each question in turn.

Matter 7 – The Strategy and Growth Area for South Sunderland

1. Strategic Policies

Is Policy SP5 justified and effective?

- 3.3 It is expected that the Council will respond in detail to this question. However, we can confirm that our client strongly supports this Strategic Policy which enables South Sunderland to continue to grow and become a spatial priority for housing and economic development. Policy SP5 allocates South Sunderland Growth Area (SS6) as a new sustainable community. The Council have undertaken a thorough assessment of areas as set out in the examination evidence base which justifies the spatial strategy for growth which we consider robust.

2. Port of Sunderland

Is Policy SS5 positively prepared, particularly in addressing issues of transport links and flood risk?

- 3.4 Our client does not intend to make representations to this policy.

3. Identification of sites and protected areas

Does the SHLAA support the SSGA?

- 3.5 Yes. The SHLAA identifies the distribution of the deliverable and developable land supply across five sub-areas within Sunderland in order to meet the housing requirement. The majority of land supply is located in South Sunderland (47%). Our client's site forms part of land north of Burdon Lane which a consortium of willing house builders on board to deliver 955 units (SHLAA Ref 477). The SHLAA assesses each site for their overall housing potential with realistic assumptions regarding a sites suitability, availability, achievability and economic viability taken into consideration. The Council have assessed our Client's land as part of the wider allocation and concludes the following reinforcing the sites deliverability;

'Site forms part of the South Sunderland Growth Area and has been masterplanned. A consortium of willing housing builders on board with the masterplan and delivery of 955 units. Subject to planning consents, the site is expected to deliver 955 units throughout the plan period, through multi-outlet delivery. A planning application has been submitted (invalid) by Persimmon Homes for part of the site, as such site moved forward into the back end of years 1-5'.

Our Client's proposed delivery strategy for the element of the site within their ownership reinforces the Council's SHLAA assessment of delivery by adding to the 'multi-outlet' delivery. It is widely acknowledged from other strategic sites elsewhere that a multi-developer approach increases overall delivery rates.

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

- 3.6 Yes. The SSGA is divided into 4 areas and our client's site forms part of land North of Burdon Lane. The configuration and scale of the site proposed is considered to be appropriate having regard to the spatial vision and strategic priorities of the Local Plan.
- 3.7 Strategic Policy SP1 seeks to deliver at least 13,410 new homes, supported by adequate infrastructure. The SHLAA sets out the deliverable and developable housing land supply by sub area and as previously mentioned 47% is located in South Sunderland (4,779 dwellings) which is reflective of the identification of South Sunderland as a major new growth area. Strategic Site Policy SS6 sets out that sites within SSGA will deliver approximately 3,000 new homes. This is consistent with the recognition that it is the largest of the four sub areas and is consistent with NPPF objective of significantly boosting the supply of homes as well as the Council's spatial strategy to meet the identified housing requirement.
- 3.8 The SHMA identifies a need to increase the number and range of houses with a particular need for more executive housing and larger family dwellings. Our client's site can be brought forward independently to meet the identified development needs of the area. It also allows development by a different developer to that of the wider site, leading to quicker delivery and more varied delivery in terms of housing type.
- 3.9 The SSGA sites as shown on the Masterplan have taken into consideration site constraints and opportunities following the SWOT analysis and adopts the development principles which we support.

Is the configuration of the settlement breaks justified?

- 3.10 It is expected that the Council will respond in detail to this question. However, we support the recommended release of land north of Burdon Lane for housing development as per the findings of the Settlement Break Review which concluded that 35% of Sunderland's settlement breaks (including the SSGA area) have a limited role hence its recommendation to release.

4. SSGA

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?

- 3.11 This question is principally for the Council to answer but the following paragraph is our response in relation to our client's site.
- 3.12 The site has been subject to a detailed Desktop Assessment and Appraisal. Further work will be carried out in advance of a detailed planning application post adoption of the Local Plan. However, the following is the current understood position regarding the site:

Landscape

- 3.13 The site is well contained below the ridge line, facing into the settlement to the north and will therefore not cause significant impact on the local visual and landscape character of the area.

Heritage

- 3.14 The site is not considered to be of any particular heritage significance. It is understood that some limited archaeological remains have been identified in the surrounding areas. A detailed Archaeological Assessment will therefore be complete prior to the submission of a planning application and mitigation/recording designed accordingly.

Biodiversity

- 3.15 The site does not contain any high value ecological habitats. All usual surveys will be completed prior to a planning application being made to the Council and mitigation designed accordingly.

Access and Transport

- 3.16 Independent access can be gained to the public highway which falls within our client's ownership and has already been upgraded to provide a bellmouth access and footpath to within the site boundary, allowing independent delivery. A plan of the extent of the adopted public highway (orange) and associated adopted verge (green) is included in figure 2, below.



Figure 2: Location of Adopted Highway (Orange) and Adopted Highway Verge (Green) in relation to site access and existing bellmouth/footpath access.

- 3.17 We have had regard to the Infrastructure requirements for SSGA and the various developer requirement's/contribution's will be provided at the necessary time once planning permission has been secured. It should however be noted that there are no key infrastructure requirements which would affect delivery of our client's land independent to other development's.

Drainage

- 3.18 The site is located within Flood Zone 1 and therefore has a low probability of flooding. The site runs downhill towards a public highway and not anticipated to have any abnormal requirements in terms of drainage. A detailed Flood Risk Assessment and Drainage Strategy will be prepared and submitted alongside any subsequent application.

3.19 In summary, assessments of the site to date have not indicated any matters which would impede the delivery or be beyond the bounds of normal mitigation for a site of this nature. It should also be noted that the Council have assessed this site as part of the wider allocation and did not identify any adverse impact which could not be overcome through appropriate mitigation.

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

3.20 It is expected that the Council will respond in detail to this question. However, our client will comply with the relevant policy requirements in bringing forward a detailed planning application.

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

3.21 It is expected that the Council will respond in detail to this question. There is nothing known at the present time which would affect delivery of affordable housing on our client's site.

How does the South Sunderland Supplementary Planning Document (SPD) relate to policy SS6?

3.22 It is expected that the Council will respond in detail to this question. However, the SPD helps inform the formulation and assessment of individual proposals for development within the SSGA. Whilst Policy SS6 outlines the development requirements, the SPD makes clear the Council's expectations for future development covering key strategic issues such as design standards, infrastructure delivery, flood risk, environmental management. The Infrastructure requirements on page 111 are important to ensure where and when development takes place. There are no known infrastructure requirements which would affect delivery of our client's land independent to other developments in the short term.

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

3.23 It is expected that the Council will respond in detail to this question. However, we understand that there is an impending planning application for the wider site which the Council/Developers can elaborate upon further. Our client intends to wait until adoption of the Local Plan before finalising a contractual relationship with a delivery partner and submission of a detailed planning application in line with the Masterplan.

Are the sites deliverable?

- 3.24 Our client's site is unconstrained and can be delivered independently to other developments in the short term and following adoption of the Local Plan is adopted. The site is suitable, available, achievable and therefore developable within the plan period.

5. Infrastructure

Will the infrastructure to support the scale of development proposed in South Sunderland be provided in the right place at the right time, including that related to transport, the highway network (particularly the Ryhope-Doxford Link Road), health, education and open space?

- 3.25 It is expected that the Council will respond in detail to this question. However, we have had regard to the Infrastructure requirements for SSGA and the various developer requirements/contributions will be provided at the necessary time once planning permission has been secured. It should however be noted that there are no key infrastructure requirements which would affect delivery of our client's land independent to other developments.

6. Delivery

Are the assumptions about the rate of delivery of houses from sites in South Sunderland realistic (anticipated delivery is shown in Appendices A, F and N of the SHLAA)?

- 3.26 The schedule of delivery set out in the SHLAA shows a steady rate of delivery for land North of Burdon Lane which includes our client's site over the plan period and we agree that delivery will start within 1-5 years. However, we are of the considered view that the number of completions could indeed be higher within the 1-5 year period given our client's intentions to develop the site in the short terms coupled with the large amount of interest shown by national house builders.

SUMMARY

- 4.1 These representations have been prepared by George F White in support of the proposed strategic policy for South Sunderland and in particular allocating our clients site for residential purposes as part of a wider allocation known as land North of Burdon Lane.
- 4.2 The level of growth proposed is consistent with NPPF and will ensure that new housing is delivered in the most sustainable locations which is considered a sound approach.
- 4.3 Our Client's land is available, achievable and developable within the plan period. Our client's intentions are to finalise arrangements with a delivery partner upon adoption of the Local Plan with detailed planning application to follow shortly after. That will facilitate swifter and more varied delivery of housing within the SSGA.

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