

Sunderland Core Strategy and Development Plan (2015-2033)
 Matter 2: Spatial Strategy and Related Policies
 Representor number: 1175997



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?

Paragraph 17 of “the Framework” (March 2012) describes that a core principle of land use planning is to:

“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable”.

Where the requirements of the Plan necessitate a Green Belt review, this is reinforced at paragraph 84 which states:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development....”

In view of the fact that a higher level of housing growth is proposed than required to meet baseline needs to meet the Council’s economic aspirations, it is logical that this additional growth be directed towards locations which are well related to established settlements and existing or emerging employment growth areas. Washington is clearly a sustainable location for housing growth, a fact recognised at paragraph 4.46 of the plan through the identification of the Land East of Washington as being capable of accommodating a sustainable community, albeit in the longer term.

Homes England is of the view that Washington is capable of accommodating a far higher number of homes over the plan period than currently identified, and that the Land East of Washington in particular is suitable, available and achievable for development, as opposed to being safeguarded to meet longer term development needs.

Washington is an established higher order settlement and a principal location for employment within Sunderland which continues to have the strongest employment land market within the City, and one of the strongest within the region. However, despite the obvious benefits to be gained from having a variety of high quality housing, serving all market sectors, in close proximity to important and expanding employment centres, the sustainability of Washington is not clearly expressed in the Plan with regards to the proposed distribution of housing growth across the City.

The submitted plan follows a trend which has seen comparatively little housing development in Washington as a proportion of Sunderland’s overall delivery in recent years. The submitted Plan acknowledges at paragraph 2.49 that only 14% of housing completions in the period 2008–2018 were in Washington.

Given Washington's role as an important and expanding local and regional employment centre, along with its historically suppressed housing market as a result of its significant Green Belt constraints, the Plan does not seize the opportunity to realign Sunderland's housing and employment growth through a more considered approach to the release of housing sites as part of the Green Belt review.

The submitted Plan relies heavily on the delivery of only six Housing Growth Areas totalling just 600 houses within the Washington sub-area. Of these, two sites at Usworth Hall(HGA4) and Rickleton(HGA6) represent 66.5% of this total. Due to the aforementioned development constraints, few sites in Washington are capable of being allocated through the forthcoming Allocations and Designations Plan, the sustained high level of demand for employment land within Washington means windfall developments would also be highly unlikely to make up for any shortfall arising from a failure of the HGAs to deliver as anticipated.

As a result, should any of these sites fail to come forward Washington would continue to make a disproportionately low contribution towards meeting Sunderland's housing need. It would fail to respond to market signals pointing to a latent housing demand in this area and also fail to capitalise upon the opportunity to improve housing quality and variety in the area, thus exacerbating the imbalance between housing and employment and foregoing opportunities to plan for truly sustainable growth.

Homes England are of the view that the proposed distribution of housing sites within the City is not justified when compared with reasonable alternatives and that a greater proportion of the City's housing growth should be directed towards Washington.

Homes England and all other parties with an interest in the land East of Washington, have made representations which demonstrate that the site is available, suitable and achievable for housing delivery. Allocation of this site for development within the Plan period would provide greater certainty that an appropriate level of sustainable housing growth will be achieved in Washington in recognition of its existing role as a key centre of employment and in support of its future growth potential.

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

The Land East of Washington is located within a highly sustainable position adjacent to the existing settlement of Washington and in close proximity to significant areas of employment around Nissan and the employment growth area at IAMP. The site effectively divides the settlement and the area covered by the IAMP AAP which anticipates circa 7,850 additional jobs will be created in the advanced manufacturing and automotive sectors during the plan period. Furthermore, the site is of a scale which is capable of providing local services and amenities to serve future residents of the site adding to its sustainability.

There are obvious benefits to creating settlements which are self-contained in relation to commuting patterns, with these factors having been a key driver in the development of Washington New Town through the application of Garden Village principles. The decision not to allocate the Land East of Washington for development within the plan period, therefore, represents a missed

opportunity to build upon Washington's historic role in aligning economic and housing growth requirements for Sunderland and the surrounding areas, this during a period in which the settlement is evolving to meet the needs of the 21st century workforce and its employers.

Allocation of the Land East of Washington for immediate delivery would improve the availability of modern, high quality and sustainably located housing which would be attractive to existing employees of Nissan and their co-located supply chain, particularly those employees seeking larger detached family homes for which Sunderland has a recognised shortfall, and for which this site is particularly well suited. Delivery of this site within the plan period would also assist in attracting investment into the IAMP as a high quality residential offer is a key consideration in the locational requirements of the operators that IAMP is targeting.

Homes England is supportive of the site being identified for release from Green Belt protection given its negligible contribution to the Green Belt and obvious development potential. However, allocation of this site for development within the plan period would facilitate the transition to sustainable modes of transport thus reducing peak hour congestion on the road network. These factors would have an immediate positive impact on reducing CO2 emissions associated with existing commuter trips to nearby employment locations.

Furthermore, the co-ordinated delivery of housing and employment would allow those relocating to the area in order to take up positions at IAMP to live within close proximity to their place of work. If the site comes forward for housing after IAMP has been substantively developed, as currently proposed, the opportunity to encourage sustainable commuting patterns would be diminished as many relocating workers would already have chosen to move to less sustainable locations, or committed to commutes from existing residential areas in the wider region due to the limited local housing options in Washington.

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?

The submitted Plan takes a proactive approach to bringing forward previously developed land. Sunderland has an admirable track record in the delivery of housing on brownfield land with 90% of housing during the period 1995 – 2016 having been delivered on brownfield sites. However, this has inevitably diminished the supply of brownfield sites which are financially viable, appropriately located and acceptable in planning terms for the development of housing, particularly those of a size in which economies of scale can assist in overcoming viability constraints or in which values can be increased through the creation of a sense of place.

The Whole Plan Viability Assessment (SD.60) advises caution in relying on brownfield sites in the plan making process. Sites within the urban area are susceptible to variations in the value of new homes due to the strong influence of site specific characteristics rather than the particular ward or postcode the scheme is located in. The viability assessment also states that its analysis indicates that brownfield sites will often be unviable, even without the proposed affordable housing policy requirement, whereas greenfield sites are comfortably able to bear the 15% requirement.

In view of the viability constraints in developing brownfield sites for housing in Sunderland, the plan should be amended to include a greater proportion of greenfield sites to ensure that:

- 1). the plan has sufficient flexibility to continue to deliver the required level of homes should market conditions tighten, and;
- 2). That delivery does not become reliant on reduced levels of developer contribution in order to make brownfield schemes viable.

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

The SHMA (SD.22) indicates that the main shortfalls in house types within the City are for larger family dwellings and bungalows. Increasing densities on brownfield sites within the urban area would not assist in meeting this specific housing need.

In view of the need to balance the requirement to prioritise brownfield sites with viability considerations; economic growth aspirations and issues around the location, mix and distribution of housing stock within Sunderland, Policy H1/1(iii) provides a flexible approach to ensure that appropriate densities are achieved on both brownfield sites and less constrained greenfield sites in order to respond to the shortfall in more land hungry, and in the case of bungalows potentially less viable, housing typologies.

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 continued availability of sites within this sub-area is particularly important in Washington to ensure that the sub-area's attractiveness to employers is not diminished. Such losses could serve to diminish the supply and availability of employment land and also risk introducing sensitive receptors, decreasing the attractiveness of nearby employment sites. However, it is recognised that a balance must be struck in the distribution of housing and employment land in order to facilitate sustainable patterns of movement and to reduce the impact of development on the city's existing highway infrastructure.

In view of the Council's economic growth aspirations it is important to maintain a strong supply of employment sites to ensure that the needs of all market sectors and scales of operation can be met so that opportunities for expansion, relocation and co-location are not lost. Furthermore, the recognised viability constraints associated with redeveloping brownfield sites in Sunderland would make housing delivery on such sites challenging and do little to provide certainty that development needs will be met over the plan period.

Although it is recognised that there are a number of poorly performing employment areas in the southern parts of the city, the submitted Plan seeks to rebalance the distribution of housing sites due to the predominance of housing delivery in this area in recent years and the associated impacts on infrastructure. Any effort to redevelop employment sites for housing in this area would, counteract this strategic aim.

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?

Homes England agrees with the Council that the scale of the need for housing and employment is such that it cannot be met within the existing urban area. Furthermore, due to the disproportionate number of new homes delivered in the less constrained southern part of the city in recent years, with this growth having placed pressure on infrastructure such as the road network and school capacity, there is a clear justification to identify the most appropriate sites within the Green Belt in the northern part of the City to accommodate the required level of growth and to rebalance the spatial distribution of housing sites within the city towards more sustainable patterns of development.

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

Gateshead and South Tyneside Councils submitted Regulation 19 representations which stated that with the Land East of Washington should only be released if there is clear justification presented through a review of the Local Plan.

Homes England is of the view that sufficient justification has been demonstrated for the Land East of Washington site to be released for development within this plan review, as opposed to safeguarding for longer term development. Furthermore, As South Tyneside have stated that they are unable to identify sites within their own area to meet housing needs, the rationale for this site being released is enhanced as it is the largest available site within close proximity to the South Tyneside Boundary which can be made available in advance of their own plan being adopted with an appropriate proportion of Green Belt releases.

Issues 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?

With the Council's strategic aim of redistributing growth away from the southern part of the area to locations where housing development can be more readily accommodated, twinned the significant land availability constraints in this part of the City, there is a clear justification for safeguarding land within the Washington sub area to provide greater certainty as to the longer term direction of growth

The adoption of the IAMP AAP (November 2017) provides a further impetus for a review of surrounding areas of Green Belt land to assess their continued contribution to the open character of the Green Belt.

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

Whilst an appropriate quantity of land is proposed to be safeguarded to meet longer term development needs across the City. The failure of this approach to direct an appropriate level of housing growth to the Washington undermines the strategic aim of rebalancing housing distribution, the strategy is also unresponsive to changing circumstances that can occur over a plan period.

To ensure that a selection of sites are available to respond to changing circumstances, a more flexible and responsive approach would be to allocate the land East of Washington and instead safeguard an appropriate selection of HGA sites to meet longer term development needs. Alternatively, the HGA sites could be removed from the Green Belt and held in reserve with policies stipulating the circumstances in which they can come forward. This approach would provide maximum flexibility in ensuring housing needs are met during, and beyond, the plan period.

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

It is considered appropriate that safeguarded land be located within Washington, this provides a clear indication of the long term aspiration to rebalance the distribution of housing and employment land in recognition of the sustainability of the settlement. However, Homes England are of the view that the suitability, availability and achievability of the site East of Washington provides sufficient justification to allocate this site for development within the plan period.

The land East of Washington is of an appropriate scale and suitably located for residential development to support the existing and growing local employment market. A co-ordinated approach to the development of housing alongside development at IAMP would generate substantial benefits and ensure that the benefits of both developments both are fully captured, particularly in relation to sustainability.

Homes England are of the view that a more robust approach would be to allocate the land East of Washington for development within the plan period and either safeguard or hold in reserve, some or all of the Housing Growth Area sites to ensure that land is available to meet longer term housing development needs.

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 settlement breaks are intended to perform particular functions, preventing the merging of settlements within the southern part of the City and maintaining the green infrastructure network. As such, it is appropriate that these areas be afforded specific protection from developments which may otherwise be permitted under Policy NE8 due to the requirements of national policy to permit development outside of settlements in certain circumstances. For instance, rural or entry level exceptions sites could potentially see the settlements merged in the absence of specific policy protection.

Although Policy NE7/1(ii) states that the designation of settlement breaks will assist in regeneration of the urban area of the City, this is a secondary function which is implicit in the restrictive nature of the policy. As such, the inclusion of Policy NE7/1(ii) may serve to dilute the true purpose of the

policy and could be removed without undermining the overriding intention of preserving the distinction between settlements and maintaining the green infrastructure network.

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

As proposals which maintain the functionality of the settlement breaks, or for which the benefits would outweigh any negative impacts can be considered acceptable, the policy has sufficient flexibility to be considered consistent with national policy.

6. Whether Policy NE8 is consistent with national policy.

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

In view of the specific issues faced in planning for growth in Sunderland, Homes England considers Policy NE8 to be consistent with paragraphs 17 and 109 of the Framework.

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

Policy NE9 seeks to conserve and enhance the "varied landscape character" of the area by directing developers to consider high quality landscape design, implementation and management as an integral part of their proposals.

As no definition is provided for the term "valued landscape" in the NPPF, and as no further clarification is provided in National Practice Guidance, the proposed approach to landscape character is appropriately addressed through reference to the landscape character assessment within Policy NE9.

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?

Although the Plan is submitted for examination under the transitional arrangements of the 2018 NPPF (as updated March 2019), the most recent version of the NPPF will be a material consideration in the determination of applications and monitoring of the local plan after adoption. As such, provisions are in place to ensure that plans are reviewed if delivery rates begin to stall through the application of the housing delivery test.

With regard to Sunderland's submitted plan, given the Green Belt constraints on edge of settlement development in the northern part of the city and the distribution of housing delivery in recent years, any provisions allowing development of unallocated edge of settlement sites would place strain on infrastructure in the south of the city and undermine efforts to direct developments towards brownfield sites within the established urban area and rebalance the distribution of housing and employment land in order to encourage more sustainable patterns of movement.

Should it be considered that additional flexibility is required to ensure that a 5 year housing supply is maintained, the Land East of Washington could be allocated for development and some or all of the HGAs held in reserve so that a range of sites of varying scales can be made available. Alternatively, the Land East of Washington could be identified as a reserve site to provide a large site for which all of those with an interest are keen to develop at the earliest possible opportunity.