

Sunderland Core Strategy and Development Plan (2015- 2033)**Matter 4: Housing Land Supply****Representor number: 1175997****Homes
England****Issue 1: Components of Housing Supply**

1.1 Will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2019)?

No comments.

1.2 Will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan (Table 22 of the Compliance Statement refers)?

No comments.

1.3 Is the small sites allowance of 50 dpa justified by compelling evidence?

The SHLAA (SD.42) indicates that over the past five years, an average of 47 dwellings per annum (net) have been delivered through sites providing four or less units, this includes new build, change of use and residential splits.

However, it should be noted that these figures have been boosted by the introduction of permitted development rights allowing the change of use from B1(a), A1 and A2 to C3 residential through the prior approval process which was introduced in 2013 and made a permanent provision under The (the Amendment Order) to the Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO). In view of the fact that national trends indicate that the uses of these permitted development rights has decreased significantly due to the erosion of the number of properties that the owners feel would be better suited to residential use, it is reasonable to assume that the contribution that this form of development will make to delivery on small sites will decrease over the course of the plan period. Growing criticism of this form of development due to examples of poor design quality and poor housing standards may also serve to reduce its market appeal going forward.

Caution should also be exercised in relying upon the delivery of housing through the subdivision of existing units to meet objectively assessed need. Although such developments can clearly be acceptable in circumstances in which the existing property is well suited to subdivision, such proposals can cause harm to the character of areas, be of poor design quality and place strain on local infrastructure. In the absence of strong evidence to suggest that Sunderland has a sufficient number of properties which are capable of being appropriately subdivided, as evidenced by the absence of any policy seeking to control such developments in the submitted Plan, such contributions should also be discounted with any which are approved treated as windfalls.

It would also not be unreasonable to assume that the number of smaller sites coming forward will reduce post plan adoption due to the increased availability of new homes on larger sites which have been identified through the plan making process in part due to their deliverability, and thus market appeal. This is particularly the case in view of Whole Plan Viability Assessment (SD.60) which suggests that brownfield sites within Sunderland are particularly 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 that which the scheme is located. Therefore, it is highly likely that sites will become available which are acceptable for housing in planning terms but which would not achieve the values required to make them viable.

In view of these factors, it is not considered that compelling evidence exists for the small sites allowance put forward in the submitted plan and this allowance should be removed.

1.4 Is the flexibility factor of 8.5% sufficient to ensure that the housing requirement will be met over the Plan period?

Although the proposed flexibility factor goes some way towards ensuring that the housing requirement will be met over the course of the plan period. The heavy reliance on brownfield sites within the existing urban area and known viability constraints means that 44% of sites would be highly susceptible to the impacts of market fluctuation in build costs and/or house prices. An increased flexibility factor would enable a greater number of more deliverable greenfield sites to be allocated to ensure that target delivery rates can be achieved in the event that unfavourable market conditions impact upon the deliverability of brownfield sites.

The Land East of Washington, currently proposed for safeguarding, presents an opportunity to allocate a site which has already been earmarked for housing growth in the longer term to come forward to deliver circa 1,200 homes within the plan period. The site is also well suited to a phased delivery approach with an initial phase coming forward within the plan period as part of a comprehensive masterplanning exercise for the wider site, with the remainder capable of being held in reserve if required to ensure that longer term development needs are met.

1.5 Is the allowance for demolitions of 20 units per year justified?

Although it is acknowledged at 6.7 of the submitted Plan that the number of demolitions is likely to reduce compared with past trends due to large scale clearances having now been undertaken, the suggested figure of only 20 demolitions per annum is considered optimistic in view of historic trends. The same section of the Plan also states that “a number of small regeneration schemes are being finalised”. However, no details are provided as to the scale or timing of these schemes.

Notwithstanding Homes England’s view that the rate of demolitions is likely to be higher than 20 per year, it should also be noted that the 5 year housing land supply position presented at Table 18 of the Compliance Statement (SD.66) includes a figure of only 21 forecast demolitions within the 1-5 year period. As the demolitions figure presented in the Plan is described as being derived from an average figure, this average should be applied to each year of the 5 year housing land supply to ensure that any larger scale clearances which could reasonably occur later in the 5 year period are fully accounted for.

2. The Housing Trajectory and HIS

2.1 Is the data that supports the Housing Trajectory (Figure 34) based on realistic assumptions?

No comments.

2.2 Will the HIS (when available) demonstrate that a five-year supply can be maintained through the plan period?

No comments.

3. Five Year Housing Land Supply

3.1 Is the use of a 5% buffer to calculate the housing land supply position appropriate?

Although it is recognised that Sunderland has achieved strong housing completion rates in recent years, a review of a longer period of time comparable with that of the proposed plan period illustrates that Sunderland have routinely delivered far fewer homes than the 745pa figure presented in the submitted plan. Table 5.3 from the 2017 SHMA update (SD.23) shows that Sunderland achieved gross housing completion rates above this level in only 8 of the 18 years between 98/99 and 15/16. The table describes average delivery rates of only 655pa in the period 11/12 to 15/16 and an average of 706pa during the period 98/99 to 15/16.

As such, to ensure that the five year housing land supply can be considered to be robust and reflective of Sunderland's track record of housing delivery it would not be unreasonable to apply the higher buffer of 20%.

3.2 Is the inclusion of 250 units from small sites justified taking into account the need to avoid double counting?

As detailed above in response to issue 1.3, Homes England does not feel that there is sufficient justification for an allowance of 50 units per annum on small sites. Therefore, the 5 year housing land supply should be amended to reflect this position.

3.3 Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions?

No comments.

3.4 Are lead in times and build out rates realistic?

No comments.

3.5 Will there be a five year supply of deliverable housing sites on adoption of the LP?

No comments.

4. The wording of the Policy SP8

4.1 Will Policy SP8 as worded be effective in ensuring the delivery of at least 745 dpa?

The wording of Policy SP8 could be reworded to be more effective in ensuring the required rate of housing delivery is achieved. The numbering of the various categories of the housing land supply suggests a ranking or prioritisation in the types of land to come forward, whereas once adopted each type of site would be equally acceptable provided schemes were acceptable in relation to detailed planning considerations.

Although it is clearly desirable to direct development towards previously developed sites within the existing urban area, the Plan recognises the viability challenges associated with developing brownfield sites in Sunderland and that specific housing needs cannot be fully met using these sites alone. As such, the Plan proposes the allocation of areas outside of the established settlements to ensure that the Plan is both sufficiently flexible and capable of delivering the types of housing for which there is a specific need. As each of these site typologies will be important in meeting housing needs across the plan period, the typologies should be presented in bullet point form.

The current wording also includes both SHLAA sites and sites to be allocated in the forthcoming A&D Plan. However, the latter will be comprised of the former so these are in fact the same sites. As such

this distinction may cause confusion in bringing forward the A&D Plan and the status of SHLAA sites following SHLAA updates after the A&D Plan is adopted.

The inclusion of reserve sites within the Plan would ensure it is responsive and sufficiently flexible to changing market conditions. Should this approach be taken forward, the inclusion of wording specifying the criteria before which reserve sites can be brought forward for development should be inserted at the end of Policy SP8 after the site typology list.

4.2 Should the policy refer to measures that would be implemented in the event of under-delivery against the minimum target or does the Housing Delivery Test contained within the 2019 Framework provide sufficient safeguards in this respect?

The Housing Delivery Test provides an appropriate monitoring mechanism to ensure that any issues of, or trends towards, under delivery of housing can be identified. However, the Plan does not include policies which would allow additional deliverable sites to be released if housing fails to come forward at the rate identified in the submitted Plan.

In view of the fact that the Plan identifies sites which are suitable for the delivery of housing in the longer term in the form of Safeguarded sites, an appropriate response is to instead allocate sites to be held in reserve and to be released should issues of under delivery arise.

As such, if the Land East of Washington is not allocated for development within the plan period as per this statement, this site should be released from the Green Belt but held in reserve for release in line with certain pre-determined criteria.