



Sunderland Local Plan Examination

Story Homes and Mr Michael Ford - North of Usworth Hall

Matter Statement 2 - Spatial Strategy and Related Policies

Issued May 2019

1.0 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?

- 1.1 The Core Strategy and Development Plan (CSDP) includes a detailed summary of the spatial context in Section 2 (Sunderland Today) which introduces the ‘five unique sub areas’: The Urban Core; Washington; South Sunderland; North Sunderland; and The Coalfield.
- 1.2 Section 2 also includes commentary on the extent of the Tyne and Wear Green Belt which currently includes land around Washington and between settlements in The Coalfield and the City.
- 1.3 Section 4 (Spatial Strategy) sets out the strategy to deliver the vision and address the issues highlighted in the early sections of the CSDP. In terms of the housing strategy, Policy SP1 (Spatial Strategy) (subpoint 2) states that the spatial strategy seeks to deliver the identified growth and achieve sustainable patterns of development in each of the sub areas.
- 1.4 Paragraph 4.24 explains that some parts of the city are less constrained by Green Belt. Whilst Story Homes and Mr Michael Ford (“our Client”) supports the provision of housing in such locations, it is recognised that focussing all of the housing need in these areas could have implications on infrastructure and the environment. Our Client therefore supports the proposed strategy which seeks to rebalance the distribution across the sub areas to ensure the needs of the entire city are met.
- 1.5 The spatial strategy includes 11 Housing Growth Areas (and amendments to the Green Belt boundary) which are capable of delivering approximately 1,330 new homes in the plan period (paragraph 4.29). Six of these sites are located in the Washington sub area including HGA4 (North of Usworth Hall) for the delivery of approximately 205 homes.
- 1.6 The current Green Belt boundary constrains development in the Washington sub area. Notably, CSDP paragraph 4.23 states that “*Washington and Springwell have experienced limited development over a number of years*”.
- 1.7 CSDP paragraph 4.24 explains how a balanced approach has been taken to ensure the “*needs of the entire city are met*”. Our Client strongly supports the approach to the release of land from the Green Belt, as identified in paragraph 4.28, is “*the most sustainable solution*”. The Washington sub-area in particular would not be able to accommodate housing growth without doing so.

1.8 Therefore, our Client considers that the distribution of housing across the sub areas is justified and that the allocation of HGA4 will support the sustainable growth at Washington.

1.9 Notwithstanding the above, our Client considers that it would be helpful if the CSDP were to include a clear breakdown of the distribution of housing within each sub area.

1.10 Accordingly, our Client fully supports Policy SP1 and sub point 2(v) in particular which states that the spatial strategy will be delivered by “*delivering the right homes in the right locations through the allocation of homes in the A&D Plan and amending the Green Belt boundary to allocate Housing Growth Areas*”.

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

1.11 Section 4 of the CSDP is clear that it responds to the underlying principle of national policy to deliver sustainable development (paragraph 4.1). Policy SP1(2) states that the spatial strategy seeks to deliver sustainable patterns of development; with emphasis on the sustainable locations in close proximity to transport hubs and by encouraging higher density.

1.12 The CSDP includes amendments to the Green Belt boundary to deliver the spatial strategy. Our Client welcomes this approach and considers that it is necessary in order to achieve sustainable development and to meet housing needs across the city.

1.13 This approach is consistent with NPPF (2012) paragraph 84 which states that when “*reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*”. NPPF (2012) paragraph 85 also requires that (when defining Green Belt boundaries), plans should (among other things) “*ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development*”.

1.14 It is clear that the Existing Urban Area is unable to accommodate all housing growth and it would also not be appropriate to direct all growth to non-Green Belt locations as this is likely to have implications on existing infrastructure and the environment.

1.15 Our Client considers that the spatial distribution is an appropriate strategy which will deliver housing growth at accessible and sustainable locations and thereby limit the impact on climate change and CO2 emissions.

2.0 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?

2.1 The Existing Urban Area is identified in the Key Diagram (Figure 12) and is the location where Policy SP1 (2ii) seeks to direct the majority of development.

2.2 Paragraphs 4.19 – 4.29 explain the sources of housing supply which will deliver the identified housing growth. Paragraph 4.22 references the SHLAA which “*has identified that approximately 13,233 new homes can be delivered in the Existing Urban Area on a mixture of brownfield (44%) and greenfield sites (56%)*”.

2.3 The CSDP is clear in the identification and justification of the allocated sites which are located outside of the Existing Urban Area. However, it is unclear from the key diagram where the

brownfield and greenfield opportunities are. As the only way to investigate this is through a time-consuming review of the SHLAA (which is likely to be updated frequently), our Client considers that the Plan should ideally include a breakdown of the brownfield and greenfield sites by sub area for ease of reference. Whilst this could be included in the CSDP, it could also be addressed in the subsequent Allocations and Designations Plan (Part 2 of the Plan).

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

- 2.4 Section 2 (Sunderland Today) (paragraphs 2.47 – 2.48) describes the historic delivery on brownfield sites and also highlights the proportion of dwellings which could be delivered on the previously developed sites identified in the SHLAA. In particular, Figure 8 presents the proportion of housing completions on previously developed land. This has averaged 90% between 1995-2016 although the percentage of completions on greenfield sites has gradually increased since 2012.
- 2.5 Section 4 (Spatial Strategy) (paragraphs 4.19 – 4.32) further explains the Council’s approach to identifying previously developed sites and the distribution of housing. Paragraph 4.20 highlights that much of the remaining land is highly constrained through contamination or other factors which affects the viability of redeveloping such sites. Our Client supports the Council’s approach which only includes previously developed sites which have been assessed as being deliverable.
- 2.6 A key aim of the CSDP is also to meet the housing needs of the entire city and to address any shortfall in the type of housing available. Accordingly, the identification of sites should also take into account other factors including accessibility, sustainability and attractiveness to the market.
- 2.7 It is clear that the housing strategy could not be delivered using only previously developed sites. There is also a shortage of land more generally within the Existing Urban Area and this is particularly notable in the Washington sub area. Amendments to the Green Belt are required to deliver the housing requirement/CSDP strategy and allow for sustainable development across the city.
- 2.8 Our Client considers that the Council’s approach is sound and achieves an appropriate balance between taking advantage of opportunities to reuse previously developed land and identifying sites which will meet the city’s housing need.

(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?

- 2.9 Our Client notes that the preparation of the Allocations and Designations Plan (Part 2 of the Plan) will consider non-strategic allocations in more detail.

3.0 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?

- 3.1 Whilst national policy states that “*Green Belt boundaries should only be altered in exceptional circumstances, through the preparation of the Local Plan*” (NPPF 2012, paragraph 83), it does not clarify what might constitute ‘*exceptional circumstances*’.
- 3.2 The CSDP evidence base includes an ‘*Exceptional Circumstances for Releasing Land from the Green Belt*’ report, prepared by Peter Brett Associates (June 2018). The report concludes (at paragraph 5.3) that the housing need; housing land supply; spatial distribution of housing land; and the need to support economic growth are exceptional circumstances to justify alterations to the Green Belt.
- 3.3 The report also states that “*it is clear that the identified housing targets and strategic corporate objectives cannot be achieved without the release of greenfield sites in the Green Belt locations*” (paragraph 5.4).
- 3.4 Paragraph 4.28 of the CSDP also explains that without alterations to the Green Belt boundaries, the Plan would not be able to accommodate housing needs. As explained in paragraph 4.24, the CSDP has sought to rebalance the distribution of housing growth as it would not be appropriate to direct the majority of the housing growth to a small area of the city. It is also evident that the Green Belt boundary severely constrains housing growth in certain areas of the city.
- 3.5 Our Client considers that the amendments to the Green Belt boundary are essential in order to deliver the spatial strategy and that exceptional circumstances have been demonstrated. The approach to amend the Green Belt to allow sustainable growth of existing communities and also accords with NPPF 2012 paragraph 84 which states that when “*reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development*”.
- 3.6 CSDP paragraph 4.40 states that Washington (the town and the sub area) is a highly sustainable location and paragraph 4.41 explains how the “*sub-area has been constrained from development by the tightest of the Green Belt boundaries and due to the lack of available land for development within the urban area*”. As this has resulted in suppressed housing need in the sub area, our Client agrees that amendments to the Green Belt are required to deliver the housing strategy which is focussed on sustainable development across the city.
- 3.7 For clarity, our Client considers that the Council’s approach is sound and that the Council has also explored all other alternative sources of land supply before electing to pursue alterations to the Green Belt Boundary.

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

- 3.8 The Council has undertaken a comprehensive Green Belt Review comprising three stages. This has included a review of all Green Belt parcels against the 5 purposes of the Green Belt; review of sites constrained by Category 1 constraints; and thorough testing against principles including sustainability, suitability, availability and achievability. This process has also involved

consultation with land promoters to ensure the decision making has been based on accurate and detailed technical information.

- 3.9 Our Client considers that the approach is robust and also consistent with the approach taken by neighbouring authorities including the approach taken by Newcastle City Council and Gateshead Council in the joint Core Strategy and Urban Core Plan (adopted March 2015).

4.0 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?

- 4.1 The NPPF states that amendments to Green Belt boundaries “*should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*” (NPPF 2012, paragraph 83).
- 4.2 Paragraph 85 (of the 2012 NPPF) allows for plans to identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer term development needs but making it clear that safeguarded land is not allocated for development at the present time.
- 4.3 The approach to include safeguarded land appears to be consistent with the provisions in national policy. The area identified in Policy SS3 and on the Policies Map includes a relatively large area of land at East Washington and a smaller area which lies immediately adjacent to the Housing Growth Area at East Springwell (HGA2).
- 4.4 The proposed allocation of HGA4 (North of Usworth Hall) represents a partial extent of the land available for development. Whilst our Client strongly supports the release of HGA4 from the Green Belt, it is considered that the site in Policy HGA4 could be extended to include the additional land for delivery in the plan period. The completed technical work demonstrates that the wider 18ha site is deliverable and could provide around 340 homes within the plan period. This minor modification to the Green Belt boundary will also ensure it is defined using a physical feature which is readily recognisable as per the requirements of NPPF (2012) paragraph 85.
- 4.5 If the approach to extend the allocation of HGA4 is not supported, it is considered that the additional land within the control of our Client immediately north of the HGA4 could be included as safeguarded land.

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

- 4.6 The NPPF (2012) (paragraphs 79 to 85) requires Local Planning Authorities to have regard to the intended permanence of Green Belt boundaries so that they should be capable of enduring beyond the plan period.
- 4.7 As such, the Council needs to satisfy itself that there will be sufficient land, at appropriate locations, to meet development needs beyond 2033. This is particularly applicable to the Washington sub-area since there is limited available land within the built-up area and the Green Belt boundary is drawn tightly around the existing settlements.

4.8 The supporting text to Policy SS3, at paragraph 4.45 states that safeguarded land is considered necessary for a number of reasons including to provide a degree of permanence to the Green Belt and also to provide flexibility.

4.9 As stated in the response to Question 4.1, if the approach to extend the allocation in Policy HGA4 is not supported, it is considered that the additional land within the control of our Client immediately north of the HGA4 allocation could be included as safeguarded land.

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

4.10 The area of safeguarded land is largely concentrated in a single location at East Washington with the inclusion of a single other small parcel of land on land South of Springwell. Our Client has previously suggested that it would be a more logical approach to 'pepper pot' areas of safeguarded land around the city.

4.11 As stated in the response to Questions 4.1 and 4.2, if the approach to extend the allocation in Policy HGA4 is not supported, it is considered that the additional land within the control of our Client immediately north of the HGA4 allocation could offer be included as safeguarded land.

5.0 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?

5.1 Our Client does not wish to comment.

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

5.2 Our Client does not wish to comment.

6.0 Whether Policy NE8 is consistent with national policy.

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

6.1 Our Client recognises that the area of Open Countryside relates to a relatively small area of the City towards the south and west. Notwithstanding this, Policy NE8 could preclude development on sites which are sustainable; whereas the NPPF (2012) seeks a more flexible and positive approach.

6.2 As set out in our Client's response to question 6.3, additional text is offered to ensure the CSDP is sufficiently flexible.

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

6.3 The only reference to 'valued landscape' appears in CSDP paragraph 10.43 which simply refers to NPPF (2012) paragraph 109. The CSDP does not go any further than this reference, nor is there is any specific national guidance as to what might constitute valued landscape.

- 6.4 A valued landscape is a high bar and it should not be attributed to large swathes of land across the city. If there are any landscapes in the district which the Council considers to be ‘valued’, our Client considers that it would be helpful for the CSDP to identify these landscapes based on clear evidence. This would be provide clarity to all parties in decision making over the course of the plan period.

(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?

- 6.5 Our Client considers that to ensure the CSDP is flexible, and able to adapt to unforeseen circumstances, Policy NE8 should include the following additional text:

“At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites, which are located entirely or partially within the Open Countryside, that would both make a positive contribution to the five year supply of housing land and be well related to existing settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the CSDP. Proposals that come forward under this mechanism should be of a scale that respects the physical size of the settlement.”

- 6.6 This additional text is an adapted version of a Main Modification (ref. MM08) to Scarborough Borough Local Plan Policy HC1. Following the examination of the Local Plan, during September 2016, Inspector William Fieldhouse proposed a similar modification in his report (paragraph 139) dated 9 February 2017.

- 6.7 Our Client suggests including the above text to ensure the CSDP is positively prepared and effective. The additional text should be included to ensure a positive approach to the consideration of housing proposals of a scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites.