

Sunderland Core Strategy and Development Management Plan Examination in Public

Response to the Inspector's Matters, Issues and Questions

Made on Behalf of Persimmon Homes (Durham) – ID 1129305

Matter 3 – Housing and Employment Objectively Assessed Needs (OAN) and Requirements

Preamble

- 3.1 This Hearing Statement is made on behalf of Persimmon Homes (Durham) (our 'Client'), in advance of making verbal representations to the Examination in Public of the Sunderland Core Strategy and Development Management Plan (CSDMP). Our Client has made comments throughout the Core Strategy consultation process, including at the Publication Draft stage.
- 3.2 Our Client has multiple land interests in land within Sunderland City Council's Authority Boundary. This Hearing Statement is specifically in reference to our Client's land at the former Hendon Paper Mill and its proposed retention as an employment allocation within the proposed Key Employment Area designation KEA1.
- 3.3 A planning application has been submitted for residential development on the former Hendon Paper Mill (Planning Ref: 18/01820/FUL), which includes associated access, landscaping and infrastructure, and discussions are ongoing with the Council.
- 3.4 Our response to the relevant questions in Matter 3 are found below. We have had specific regard to the tests of soundness outlined in the National Planning Policy Framework (the 'Framework'); namely that the policies in the CSDMP are must be justified, effective, positively planned and consistent with national policy in order to be found sound. As the CSDMP was submitted to the Secretary of State by Sunderland City Council (the 'Council') prior to the transition deadline set in Annex 1 of the February 2019 Framework, we have referred back to the March 2012 Framework where appropriate within this Hearing Statement, as per the stated transitional arrangement.

Issue 1: The Housing OAN and Requirement.

Question 1.1: Does the evidence base support the requirement for housing of 745 dwellings per annum (dpa) or 13,410 dwellings for the LP period taking into account demographic and economic factors, market signals and affordable housing need?

- 3.5 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

Question 1.2: Is the approach to calculating the OAN and housing requirement reasonably consistent with other local planning authorities (LPAs) in the region?

3.6 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

Question 1.3 Should the housing requirement be higher: a. To support job growth, including that at the International Advanced Manufacturing Park (IAMP) and/or b. To support an uplift in Household Representative Rates for 25 to 44 age range and to help address the affordable housing imbalance?

3.7 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

Question 1.4 Alternatively should the housing requirement be lower taking into account factors such as the impact of Brexit and introduction of the standardised methodology for calculating Local Housing Need?

3.8 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.

Issue 2: The Employment OAN.

Question 2.1: Does the evidence base support the OAN of at least 95 ha of employment land?

3.9 The Council's 2016 Employment Land Review – SD.37 (ELR) is considered to be the primary reference for the Council calculating its proposed employment land need between a range of 95ha -115ha. The 2017 Employment Land Review Post EU Referendum Forecasting Analysis – SD38 (ELR-PEUR) purposefully does not set out to update this figure, but quite clearly sets out that the Council should consider planning for a level of demand towards the lower end of the range.

3.10 Whilst the ELR does make reference to the International Advanced Manufacturing Park (IAMP), it is our client's belief that the ELR and all subsequent updates and analysis fails to fully recognise the impact that the IAMP will have. Over the length of the plan it is unrealistic to assume that IAMP will not impact the supply of general employment land in Sunderland, in particular as some of the uses proposed for IAMP are already located within the authority. Some of the proposed uses within IAMP will also lend itself to general employment purposes, whether specifically for automotive or advanced manufacturing purposes or not.

3.11 IAMP does also include provision for employment uses outside of the automotive and advanced manufacturing sectors, and quite clearly will generate windfall employment land sites, such as has been evidenced with Rolls Royce who took a large former Dunlop Tyres factory in Washington. In turn, the Rolls Royce factory located in Pallion is being cleared and would provide 4.26ha of employment land.

- 3.12 Both the ELR and the ELR-PEUR set out that even if the recommendations of the sites to be deallocated in Sunderland South sub area were taken forward, then still 34.4ha (table 3.4 of the ELR PEUR) of supply in Sunderland South would contribute towards the 95ha required. This is despite Sunderland South only having an 11ha-14ha demand for employment land.
- 3.13 The recommendation in the ELR and the ELR-PEUR is to further reduce the amount of employment supply in Sunderland South over and above that already proposed, and to increase the supply of land in the Washington Sub area. The Council have failed to do this, and in doing so the Council's strategy of continuing with an oversupply of employment land in Sunderland South against the evidence base recommendations to deallocate further land within the sub area. This undermines the Council's employment land delivery strategy against its calculated supply.
- 3.14 In the Council's calculation of its employment land need, it must be taken into account that it included an adjustment for the loss of employment land for alternative uses. This level of adjustment is set at the replacement of 66% of employment land lost to alternative uses which is the equivalent of 3.2ha per annum. So the Council are actively planning to over allocate employment land with the understanding some of it will be lost to non-employment uses.
- 3.15 It is also important to consider that the target range of 95ha -115ha was set in the ELR from 2016. The 2017 ELR PEUR then states in paragraph 2.93 that the Council may wish to consider planning for a level of demand towards the lower end of that range. The Compliance Statement – SD.66 considers an updated employment land supply position, which whilst not fully publishing an update to the ELR considers that 92.85ha of employment land is available as of September 2018.
- 3.16 However, based on historical take-ups it is expected that around 20-24ha of employment land take up will have occurred during the 3-year period since the ELR was published, which therefore reduces the current employment land requirement to between 75ha and 95ha. When the expected employment land take up of between 20-24ha is factored in from the previous three years, this means the available employment land in the plan period is between 112.85ha and 116.85ha. This is right at the top end of the ELR recommendation of 95ha - 115ha, and contrary to the ELR PEUR recommendation to plan for a level of demand towards the lower end of that calculated range.
- 3.17 The Council are therefore unjustified in their approach to calculating employment land demand and are proposing to allocate employment sites for long term protection where, when assessing the evidence base, there is a lack of demand for employment land and this is contrary to paragraph 22 of the Framework. We have explored this in more detail within our Employment Note within Appendix B.

Issue 3: Alignment between housing and employment requirements

Question 3.1. Is there sufficient alignment between housing and employment requirements?

3.18 Our Client does not wish to make written representations on this part of the question as part of this Hearing Statement.