

Sunderland Local Plan Examination

Hellens Land Limited – Hastings Hill

Matter Statement 7 - Strategies and Allocations for South Sunderland

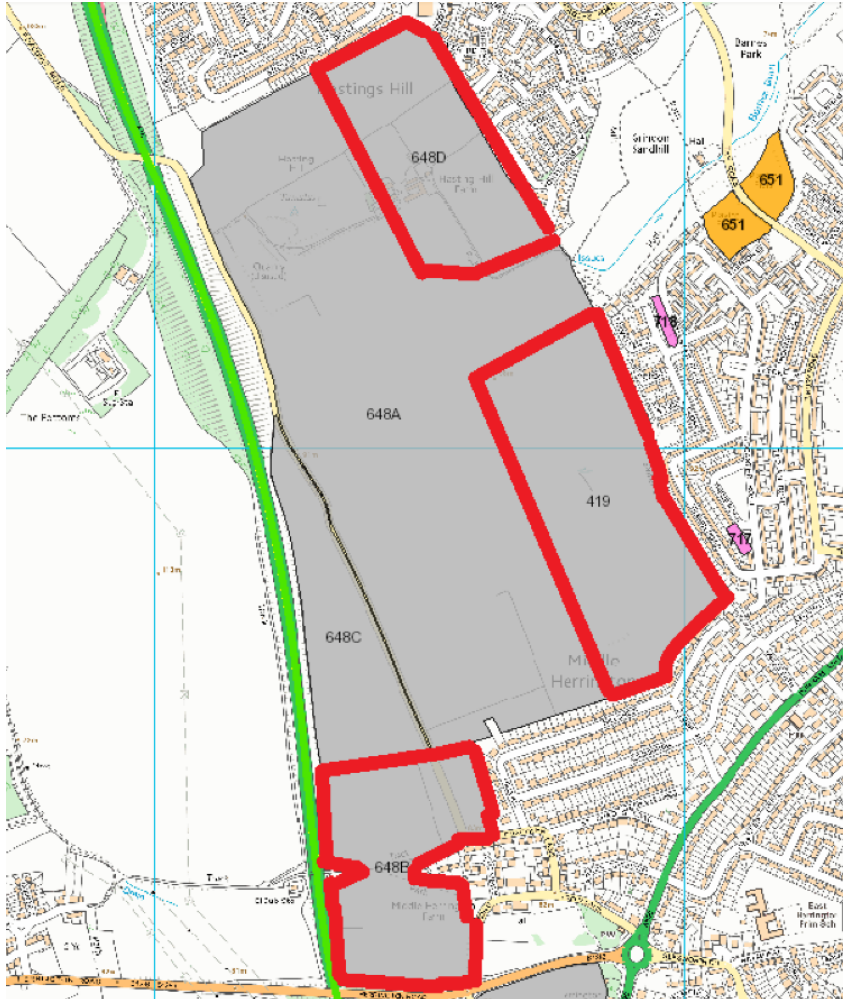
Issued May 2019

1.0 Strategic Policies

(1.2) Is Policy SP5 justified and effective?

- 1.1 Hellens Land Limited (“Hellens”) welcomes and supports the overall approach of Policy SP5 which sets out that South Sunderland will continue to grow and become a spatial priority for housing and economic development. Hellens agrees with paragraph 2.13 of the Core Strategy and Development Plan that the South Sunderland sub-area is the most populated sub area of the City and that it is currently constrained by being bounded to the south and west by Green Belt, coast line to the east and the River Wear to the north.
- 1.2 Hellens also agrees that amendments to the Green Belt are required to allow for the sustainable expansion of settlements to meet the long terms needs of the City. Given that current the Green Belt Boundary in Sunderland South constrains growth to the West, does not serve the purpose of the Green Belt and is an anomaly of the Green Belt, Hellens considers that it would be a logical approach to allow sustainable growth in this location.
- 1.3 Whilst Hellens supports the housing strategy in the CDSP, Policy SP5 could be extended to include the release of the land east of the A19 at Middle Herrington and Hastings Hill (SHLAA refs. 648B, 648D and 419, as shown in Figure 1 below), from the Green Belt for development in the plan period, if additional sites are needed.

Figure 1 Location of sites (SHLAA refs. 648B, 648D and 419)



Source: Sunderland Council SHLAA Interactive Map, Lichfields site boundary markings in red

- 1.4 Hellens considers that this approach would be consistent with the revised NPPF (2019) (paragraph 136), which prescribes that in reviewing Green Belt boundaries, Local Planning Authorities should have regard to their intended permanence so that they can endure beyond the plan period. As such, the Council needs to satisfy itself that there will be *sufficient* land, at appropriate locations, to meet development needs beyond 2033.
- 1.5 This is particularly applicable to the South Sunderland sub-area since it is heavily constrained. Hellens' preferred approach would therefore be for these sites to be allocated for delivery within the plan period. If the Council does not support this approach, Hellens requests that the sites are released from the Green Belt and included as safeguarded land (Policy SS3), noting that there is currently no safeguarded land at all in the South Sunderland sub-area.
- 1.6 As detailed in our response to 2.3 below, the land represents a deliverable housing site with no identified constraints that preclude its allocation for residential development. Hellens therefore considers that the release of the site from the Green Belt is a logical location to deliver new homes and would allow housing growth to support the Council's identified housing need in the most populated sub-area of Sunderland.

3.0 Identification of Sites and Protected Areas

(3.2) Is the configuration and scale of the SSGA sites justified taking into account development needs and the SHLAA and other assessments?

- 3.1 As outlined above, whilst supporting the overall approach of Policy SP5, Hellens considers that Policy SP5 (2) could be extended to include the release of the land east of the A19 at Middle Herrington and Hastings Hill (SHLAA ref. 648B, 648D and 419, as shown in Figure 1 above), from the Green Belt for development in the plan period, if additional sites are required.
- 3.2 The Council's most recent assessment of the sites (SHLAA (2018) ref. 648B, 648D and 419) assess the sites as not currently developable. However, Hellens has considered the Council's SHLAA (2018), along with other evidence-based documents, and has previously sought to respond to any potential concerns about developing the site. These are re-iterated below.

Site 648B

- 3.3 This site is suitable for residential development. It relates well to the existing built form of Middle Herrington, with the A19 acting as a defensible boundary to the west and the Herrington Welfare Park to the east. Middle Herrington has a range of facilities including a primary school, public house, village hall and small shops/businesses. It benefits from strong road linkages, with easy access to the A19 and Sunderland City Centre via the A690. The site also benefits from strong public transport links, with access via Herrington Road to the south.
- 3.4 The assessment within the Stage 3 GBSSR concludes that the site is not suitable for release from the Green Belt due to policy constraints such as hydrology, but also in relation to impact on Green Belt purpose, wildlife corridor, the historic environment, landscape and highways access. The below affirms that the site is suitable for Green Belt release and should be allocated for residential development. As technical reports referenced below have already been submitted to the Council as part of previous representations, these are not re-submitted.

Hydrology

- 3.5 A Flood Risk Assessment and Drainage Strategy (February 2017) has been undertaken by Patrick Parsons.
- 3.6 This confirms that, should the site be allocated and granted permission for residential development, NWL will begin the investment process to identify and implement a solution to enable surface water and foul water to discharge into a public sewer network.
- 3.7 It sets out that the site is within Flood Zone 1, where there is less than a 0.1% (1 in 1000) chance of flooding occurring each year. Paragraph 4.8 of the report references that Sunderland City Council's Strategic Flood Risk Assessment states that there is no significant risk of groundwater flooding in the area. Whilst the Environment Agency Surface Water Flood Map identifies that small individual areas centrally on site are subject to a high flood risk, these areas correspond with the low spots identified on the topographic survey and surface water flooding would be reduced or eliminated post development as the site levels would be regraded to direct surface water away from buildings and towards landscaped or impermeable areas through positive drainage.
- 3.8 The report confirms that the proposed development is appropriate and sustainable in relation to the NPPF.

Ecology

- 3.9 A Preliminary Ecological Appraisal (PEA) has been undertaken by Penn Associates. It identifies that the site is around 5.5km from the International/European designated wildlife sites (Durham Coast SAC, Northumbria Coast SPA and Ramsar site) meaning there may be a requirement for a Habitats Regulations Assessment; albeit at this stage direct impacts are likely to be low. Mitigation may be required in relation to indirect impacts.
- 3.10 The site is within proximity to six national sites and there is a single local wildlife site within 1km of the site, but this is separated by the A19 which is a significant barrier to ecological connectivity meaning there are no direct adverse impacts on the local wildlife site predicated as a result of the proposed development.
- 3.11 The southern part of the site is semi-improved grassland with some trees and shrubs whilst the northern part of the site is arable. The PEA identifies that the majority of the site is of less than local value for nature conservation. It identifies there are areas of local value for nature conservation. Any proposed development would seek to prevent the loss or mitigate loss where necessary.
- 3.12 There are no identified constraints that cannot be overcome through appropriate mitigation.

The Historic Environment

- 3.13 Northern Archaeological Associates have undertaken a Geophysical Report to assess the extent of archaeological features on site.
- 3.14 The anomalies identified within this site, whilst impacted on by modern disturbance such as buried utilities, are largely considered to relate to medieval phases or activity including agricultural activity such as ridge and furrow, raised platforms and in-filled stream. There are no insurmountable historic or archaeological issues identified.

Landscape

- 3.15 A Landscape and Visual Overview of the site has been undertaken by Southern Green. This considers that site 648B has a lower visual sensitivity to residential development, subject to detailed layout considerations. Potential landscape and visual effects could be reduced through the retention of the existing trees along the southern boundary with Herrington Road, integration of public rights of way and appropriate stand-off distances.

Highways and Access

- 3.16 Whilst the Green Belt review queries whether access is achievable, in a letter from WYG Transport, it is confirmed that access to site 648B is achievable via Herrington Road. The letter confirms that there are good opportunities for pedestrian and cyclists to connect to the existing network. The letter concludes that there are no insurmountable transportation issues that would prevent the residential development of the site.

Availability

- 3.17 Our client has a controlling interest in the land and has confirmed that the site could be made available to deliver housing in the short term (i.e. 0-5 years). This will make a valuable contribution to the housing needs of both St Chad's ward, in which the site is located, and the wider needs of Sunderland.

- 3.18 As identified within the Core Strategy, there is an identified housing need in Sunderland. At local level, the site is located within the St Chad's ward. Noting desk top research relating to the St Chad's Ward:
- St. Chad's is a strong market area: a review of 'time on market' data for 2015 demonstrates that houses in this locality took an average of 183 days to sell against the Sunderland wide average of 211 days.
 - There is a clear need for larger family houses both a City Wide and St. Chad's level:
 - a Only 7.5% of dwellings in St. Chad's have four or more bedrooms compared to 14.5% of dwellings in Sunderland as a whole; and
 - b Only 7.8% of dwellings in St. Chad's are detached, compared to 11.6% for Sunderland as a whole.
 - There is a need for affordable housing: and
 - There is a back log of need and newly arising need.

3.19 Clearly the delivery of housing at the subject site will help to achieve the aspirations at both the local authority and local level within a strong market area. Particularly noting that previous draft site HRS11 (Land at West Park, Middle Herrington) is no longer proposed for housing. The allocation of the site for housing will help meet the identified need in this area.

3.20 Should the site be removed from the Green Belt and permission granted for housing, there are no doubts on the availability of this land to support new housing development that will be achieved within the next five years.

Deliverability and Developability

3.21 It has been demonstrated that the site is suitable, available and achievable for housing development and therefore deliverable. There are no constraints that would prevent the release of the site from the green Belt and its allocation for residential development.

Site 648D

3.22 The site is suitable for residential development. It relates well to the existing built form of Middle Herrington and represents a natural extension to the Goldsmith Road and Brockenhurst Drive estates.

3.23 The site is well served by existing facilities within Grindon and Middle Herrington including a primary school, public house, village hall and small shops/businesses. It benefits from strong road linkages, with easy access to the A19 and Sunderland City Centre via the A690. The site also benefits from strong public transport within Grindon.

3.24 The assessment within the Stage 3 GBSSR concludes that the site is potentially suitable for housing development. It identifies that ground conditions, physical constraints and hydrology appear suitable and feasible. It identifies that mitigation would be required to reduce the impact on archaeology wildlife, landscape and access arrangements would need to be resolved.

3.25 However, the site was not selected for Green Belt deletion because of potential cumulative issues relating to impact on the Green Belt, access, the need to provide a suitable buffer to the SAM, impact on wildlife and loss of agricultural land.

Hydrology

- 3.26 The Council's Stage 3 GBSSR concludes that hydrology appears to be suitable and feasible.
- 3.27 Notwithstanding this, a Flood Risk Assessment and Drainage Strategy (February 2017) has been undertaken by Patrick Parsons.
- 3.28 This confirms that, should the site be allocated and granted permission for residential development, NWL will begin the investment process to identify and implement a solution to enable surface water and foul water to discharge into a public sewer network.
- 3.29 It sets out that the site is within Flood Zone 1, where there is less than a 0.1% (1 in 1000) chance of flooding occurring each year. Paragraph 4.8 of the report references that Sunderland City Council's Strategic Flood Risk Assessment states that there is no significant risk of groundwater flooding in the area. Whilst the Environment Agency Surface Water Flood Map identifies that small individual areas centrally on site are subject to a high flood risk, these areas correspond with the low spots identified on the topographic survey and surface water flooding would be reduced or eliminated post development as the site levels would be regraded to direct surface water away from buildings and towards landscaped or impermeable areas through positive drainage.
- 3.30 The report confirms that the proposed development is appropriate and sustainable in relation to the NPPF.

Ecology

- 3.31 A Preliminary Ecological Appraisal (PEA) has been undertaken by Penn Associates. It identifies that the site is around 5.5km from the International/European designated wildlife sites (Durham Coast SAC, Northumbria Coast SPA and Ramsar site) meaning there may be a requirement for a Habitats Regulations Assessment; albeit at this stage direct impacts are likely to be low. Mitigation may be required in relation to indirect impacts.
- 3.32 The site is within proximity to six national sites and there is a single local wildlife site within 1km of the site but this is separated by the A19 which is a significant barrier to ecological connectivity meaning there are no direct adverse impacts on the local wildlife site predicated as a result of the proposed development.
- 3.33 The southern part of the site is arable land. The northern part is grassland with rig and furrow and permanent semi-improved grassland. The PEA identifies that the majority of the site is of less than local value for nature conservation. It identifies there are areas of local value for nature conservation. Any proposed development would seek to prevent the loss or mitigate loss where necessary. There are no identified ecology constraints that would preclude the development of the site for housing. Indeed, there is scope that the protection of the land to the west could bring about ecological benefits.

The Historic Environment

- 3.34 Northern Archaeological Associates have undertaken a Geophysical Report to assess the extent of archaeological features on site. There is evidence of prehistoric activity within and in the local environs of the site. The scheduled monument of Hastings Hill cursus and causewayed enclosure lie to the west of site. No upstanding remains of the monument exist however the geophysical survey recorded the presence of features. Hastings Hill round barrow schedule monument is around 200m north. Ridge and furrow has been identified in the site.

- 3.35 The development of the site could realise benefits to the historic environment through an improved understanding of the site (professional and public) enhanced through information boards and also the development of the site for housing would protect some below ground archaeology which is currently at risk through the intensive farming of the site. The land to the west of the site within Hellens' control would be protected for public open space; providing a public benefit and protecting historic assets.

Landscape

- 3.36 A Landscape and Visual Overview of the site has been undertaken by Southern Green.
- 3.37 The report identifies that site 648D would have a low sensitivity to the introduction of residential development subject to detailed design including appropriate set back distances, boundary treatments and open space.

Highways and Access

- 3.38 Whilst the Green Belt review queries whether access is achievable, Gentoo has confirmed their agreement to work with Hellens to achieve suitable accesses to site 648D. Access to site 648D would be via Goldsmith Road.
- 3.39 In a letter from WYG Transport, it is confirmed that access to site 648D is achievable via Goldsmith Road. It also suggests a second access from North Farm Avenue. The letter confirms that there are good opportunities for pedestrian and cyclists to connect to the existing network.
- 3.40 The letter concludes that there are no insurmountable transportation issues that would prevent the residential development of the site.

Availability

- 3.41 Our client has a controlling interest in the land and has confirmed that the site could be made available to deliver housing in the short term (i.e. 0-5 years). This will make a valuable contribution to the housing needs of Sunderland.
- 3.42 Should the site be removed from the Green Belt and permission granted for housing, there are no doubts on the availability of this land to support new housing development that will be achieved within the next five years.

Deliverability and Developability

- 3.43 It has been demonstrated that the site is suitable, available and achievable for housing development and therefore deliverable. It is our client's firm view that the site should be removed from the Green Belt and allocated for residential development.

Site 419

- 3.44 In terms of whether the site is suitable for residential development, it relates well to the existing built form of Middle Herrington and represents a natural extension to Hillcrest and Tilbury Road. The site is well served by existing facilities within Middle Herrington including a primary school, public house, village hall and small shops/businesses. It benefits from strong road linkages, with easy access to the A19 and Sunderland City Centre via the A690. The site also benefits from strong public transport links via Thorney Close.

- 3.45 The assessment within the Stage 3 GBSSR concludes that the site is potentially suitable, and that ground conditions, physical constraints and hydrology appear suitable and feasible. However the site was not deleted for Green Belt because of potential cumulative issues including access, Green Belt purposes and the need to provide a suitable buffer to the adjacent Scheduled Ancient Monument, impact on wildlife and agricultural land.

Hydrology

- 3.46 The Council's Stage 3 GBSSR concludes that hydrology appears to be suitable and feasible. Notwithstanding this, a Flood Risk Assessment and Drainage Strategy (February 2017) has been undertaken by Patrick Parsons.
- 3.47 This confirms that, should the site be allocated and granted permission for residential development, NWL will begin the investment process to identify and implement a solution to enable surface water and foul water to discharge into a public sewer network.
- 3.48 It sets out that the site is within Flood Zone 1 where there is less than a 0.1% (1 in 1000) chance of flooding occurring each year. Paragraph 4.8 of the report references that Sunderland City Council's Strategic Flood Risk Assessment states that there is no significant risk of groundwater flooding in the area. Whilst the Environment Agency Surface Water Flood Map identifies that small individual areas centrally on site are subject to a high flood risk, these areas correspond with the low spots identified on the topographic survey and surface water flooding would be reduced or eliminated post development as the site levels would be regraded to direct surface water away from buildings and towards landscaped or impermeable areas through positive drainage.
- 3.49 The report confirms that the proposed development is appropriate and sustainable in relation to the NPPF.

Ecology

- 3.50 A Preliminary Ecological Appraisal (PEA) has been undertaken by Penn Associates. It identifies that the site is around 5.5km from the International/European designated wildlife sites (Durham Coast SAC, Northumbria Coast SPA and Ramsar site) meaning there may be a requirement for a Habitats Regulations Assessment; albeit at this stage direct impacts are likely to be low. Mitigation may be required in relation to indirect impacts.
- 3.51 The site is within proximity to six national sites and there is a single local wildlife site within 1km of the site, but this is separated by the A19 which is a significant barrier to ecological connectivity meaning there are no direct adverse impacts on the local wildlife site predicated as a result of the proposed development.
- 3.52 The site is arable land with a central/eastern area of arable grass and trees. The PEA identifies that the majority of the site is of less than local value for nature conservation. It identifies there are areas of local value for nature conservation. Any proposed development would seek to prevent the loss or mitigate loss where necessary. There are no ecological constraints that would preclude the development of the site for housing.

The Historic Environment

- 3.53 Northern Archaeological Associates have undertaken a Geophysical Report to assess the extent of archaeological features on site.

- 3.54 There is evidence of prehistoric activity within and in the local environs of the site. The scheduled monument of Hastings Hill cursus and causewayed enclosure lie to the west of site.
- 3.55 No upstanding remains of the monument exist however the geophysical survey recorded the presence of features. Hastings Hill round barrow scheduled monument is around 200m north. In areas, there is reduced topsoil which indicates that agricultural activity is likely to have destroyed features.
- 3.56 The development of the site could realise benefits to the historic environment through an improved understanding of the site (professional and public) enhanced through information boards and also the development of the site for housing would protect some below ground archaeology which is currently at risk through the intensive farming of the site. The land to the west of the site, within the control of Hellens would be gifted to the Council and protected for public open space; providing a public benefit and protecting historic and ecological assets.

Landscape

- 3.57 A Landscape and Visual Overview of the site has been undertaken by Southern Green.
- 3.58 The report identifies that sections of site 419 would have a lower sensitivity to the introduction of a proposed residential development, subject to detailed layout. This could be achieved through appropriate green corridors, SUDs features, appropriate boundary treatments and set back distances. All of which could be provided on site.

Highways and Access

- 3.59 Whilst the Green Belt review queries whether access is achievable, Gentoo has confirmed their agreement to work with Hellens to achieve suitable accesses to site 419. Access to site 419 would be via Trevelyan Close.
- 3.60 Indeed, in a letter from WYG Transport, it is confirmed that access could be achieved to site 419 via Trevelyan Close. The letter confirms that there are good opportunities for pedestrian and cyclists to connect to the existing network. The letter concludes that there are no insurmountable transportation issues that would prevent the residential development of the site.

Availability

- 3.61 Our client has a controlling interest in the land and has confirmed that the site could be made available to deliver housing in the short term (i.e. 0-5 years). This will make a valuable contribution to the housing needs of both St Chad's ward and the wider needs of Sunderland.
- 3.62 Should the site be removed from the Green Belt and permission granted for housing, there are no doubts on the availability of this land to support new housing development that will be achieved within the next five years.

Deliverability and Developability

- 3.63 It has been demonstrated that the site is suitable, available and achievable for housing development and therefore deliverable. There are no identified constraints that preclude the removal of the site from the Green Belt and its allocation for residential development.

Summary

- 3.64 As demonstrated above, the land to the east of the A19 at Middle Herrington and Hastings Hill (SHLAA refs. 648B, 648D and 419), represents a deliverable site in the context of the NPPF (Annex 2, page 66), with no known constraints that would preclude development. Hellens therefore considers that the release of the site from the Green Belt is a logical location to deliver new homes and would allow housing growth to support the Council's identified housing need in the most populated sub-area of Sunderland, if additional sites are required.
- 3.65 Hellens' preferred approach would be to allocate these sites for delivery within the plan period. If the Council does not support this approach, Hellens requests that the land should be released from the Green Belt and included as safeguarded land (Policy SS3).