

# Sunderland Local Plan Examination

## Story Homes and Mr Norman Elliott - Springwell

### Matter Statement 7 - Strategies and Allocations for Washington

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Issued May 2019

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#### 1.0 Strategic Policies

##### (1.1) Are Policies SP3 and SS2 justified and effective?

##### Policy SP3 (Washington)

- 1.1 In respect of their land interest at Springwell (HGA2 and SS3), Story Homes and Mr Norman Elliott (“our Client”) support the Council’s approach to the release of land from the Green Belt in the Washington sub-area for residential development.
- 1.2 Our Client agrees with paragraph 4.40 which states that Washington (the town and the sub area) is a highly sustainable location and that the Washington “*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.*” (paragraph 4.41). This has resulted in suppressed housing need within the local area. Accordingly, our Client agrees that amendments to the Green Belt are required to allow for sustainable expansions of settlements to meet the long terms needs of the city.
- 1.3 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 which, 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.
- 1.4 Therefore, our Client considers that the distribution of housing across the sub areas and that the allocation of HGA2 is justified and it will support the sustainable growth at Springwell.
- 1.5 Policy SP3(3) details the Housing Growth Areas (HGAs) which includes land at East Springwell (HGA2) and also land to be safeguarded (Policy SS3). Policy SS3 includes land South of Springwell which lies immediately adjacent to the proposed East Springwell Housing Growth Area (HGA2).
- 1.6 Whilst our Client strongly supports the release of both parcels from the Green Belt, Policy HGA2 includes only a partial extent of the land available for development with the remaining land identified in Policy SS3 as safeguarded land. As set out in our previous representations to the CSDP (Publication Draft), our Client considers that this should instead be included in Policy HGA2 for delivery in the plan period to allow a comprehensively planned development of the site. The Technical Summary Document (submitted to the consultation on the CSDP Publication Draft in 2018) demonstrates that the wider 6.55 hectare site is deliverable and could provide approximately 140 homes within the plan period.

1.7 Our Client considers Policy SP3 to be justified and effective. The Council’s approach to the release of land from the Green Belt for residential development is strongly supported and the proposed allocation of the site. However, our Client considers that the allocation (HGA2) would more effectively deliver the strategic priorities of the CSDP if all of the land available for development were allocated.

1.8 The development of additional homes on the site will deliver significant and lasting economic, social and environmental benefits to the local community. Socially, it would further contribute to meeting Sunderland’s housing requirement, widening the range and choice of new homes in the wider Washington sub area, whilst concurrently helping to retain and attract economically active, skilled residents who will generate significant local area spending, enhancing the vitality of local services. Development of the site also has the potential to deliver biodiversity enhancements through the creation of new habitats and other environmental benefits by promoting sustainable methods of travel.

**Policy SS2 (Washington Housing Growth Areas)**

1.9 Policy SS2 appears to be consistent with the equivalent overarching policies for the housing growth areas in the other sub-areas. Our Client broadly supports Policy SS2 but offers the following comments in response to each of the sub points.

1.10 SS2(1) states that development should “*provide a mix of housing types with a focus on family homes*”. Whilst this appears to be a reasonable requirement, it is currently unclear whether this aligns entirely with the requirements in Policies H1 (Housing Mix) and H2 (Affordable Homes). For example, Policy H1 in particular encourages the provision of larger detached dwellings which is supported to vary the existing housing stock and support economic growth initiatives. However, it is unclear whether this is the same as requiring a focus on family homes.

1.11 SS2(2) states that development should “*address impacts and make provision or contributions towards education provision and healthcare*”. In order to be effective, this should be linked to the planning obligation tests set out in the NPPF (2012) (paragraph 204). Accordingly, we request the following amendment:

*“2. address impacts and make provision or contributions towards education provision and healthcare where justified and necessary.”*

1.12 SS2(3) states that development should “*enhance access to local facilities and services and*”. As currently drafted, the requirements upon an applicant are not clear and thus the policy is not effective. We suggest that the following amendment would provide clarity and ensure the effectiveness of the policy:

*“3. enhance access to local facilities and services where appropriate and”*

1.13 With these suggested minor amendments our Client would consider that Policy SS2 is justified and effective.

**2.0 Identification of Sites**

**(2.1) Do the Green Belt assessments support the HGAs and areas of Safeguarded Land in Washington and demonstrate exceptional circumstances for the removal of land from the Green Belt?**

2.1 The Council’s suite of evidence relating to the Green Belt comprises the following reports:

- Green Belt Review Stage 1 – Core Strategy Growth Options Stage (2016) (SD.29);
- Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30);
- Green Belt Site Selection Report (2017) (SD.31);
- Green Belt Assessment 2018 Addendum (2018) (SD.32);
- Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (2018) (SD.33); and
- Review of the Sunderland Green Belt Part 2: Boundary Assessment and Recommendations (2018) (SD.34).

2.2 Together these reports provide an iterative approach to the selection of sites for release from the Green Belt for housing development. The Green Belt Site Selection Report (2017), which provides the third stage of assessment identifies 15 sites proposed as Housing Release Sites. This includes land at East Springwell (Policy HGA2) and South of Springwell (Policy SS3) which was assessed under parcel reference 424.

2.3 The Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt (2018) report provides an assessment of whether there are exceptional circumstances which justify amending the Green Belt boundary within Sunderland City Council’s administrative area. The report concludes that exceptional circumstances do exist that justify the removal of some land from the Green Belt in the Council’s administrative area.

2.4 The exceptional circumstances relate to the housing need and land supply as well as the spatial distribution of housing land, and the need to support economic growth. The recognised imbalance in the spatial distribution of identified housing land supply is particularly relevant to the justification for releasing the HGAs in the Washington sub area. The report finds that the lack of identified housing land supply in the north of the city compared to the southern part of the city (which is not constrained by Green Belt), is leading to an over-concentration of supply in one location and pressure on local infrastructure and environmental impacts.

2.5 Our Client therefore considers that the Council’s evidence base relating to the Green Belt provides robust support for the Housing Growth Areas, and positively demonstrates exceptional circumstances for the removal of land from the Green Belt.

**(2.2) If exceptional circumstances have been demonstrated have these been clearly articulated in the Plan?**

2.6 The exceptional circumstances which justify the removal of land from the Green Belt are set out in the Spatial Strategy (section 4 of the CSDP), and paragraphs 4.14 – 4.28 are of particular relevance.

2.7 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.

2.8 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*”.

- 2.9 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 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.
- 2.10 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*”.
- 2.11 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*”.
- 2.12 It is also considered that the Plan provides a clear and comprehensive explanation of the exceptional circumstances which exist to justify the removal of land from the Green Belt.

### **(2.3) Are the configuration and scale of the HGAs and areas of Safeguarded Land justified taking into account development needs and the Green Belt assessments?**

- 2.13 The proposed allocation of HGA2 (East Springwell) represents a partial extent of the land available for development with the remaining land identified in Policy SS3 as safeguarded land.
- 2.14 Whilst our Client strongly supports the release of both parcels from the Green Belt, it is considered that the site in Policy HGA2 should be extended to include the additional land for delivery in the plan period. This would allow a comprehensive development of the site which would aid design and provision of site infrastructure. The completed technical work demonstrates that the wider 6.55 hectare site is deliverable and could provide around 140 homes within the plan period.

### **(2.4) Is there any justification for the allocation of the safeguarded sites at this stage?**

- 2.15 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).
- 2.16 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.
- 2.17 The approach to include safeguarded land appears to be consistent with the provisions in national policy. Accordingly, our Client supports the principle of including safeguarded land. However, the selection of sites for safeguarding is unorthodox. The area identified in Policy SS3 and on the Policies Map includes a relatively large area of land at East Washington and, comparatively, a much smaller area which lies immediately adjacent to the Housing Growth Area at East Springwell (HGA2).

- 2.18 As explained earlier in the statement, this smaller parcel is being promoted for development as part of a wider development with the land identified in HGA2. Our Client considers that it would be a logical approach to extend the HGA2 allocation for delivery in the plan period.

### **3.0 HGA2 – East Springwell**

#### **(4.1) Is the Council satisfied that the landscape, heritage, biodiversity, access, transport, drainage and other constraints are capable of being mitigated so that development of the site would be acceptable?**

- 3.1 Our Client supports the Council's assessment that any constraints to development can be mitigated so that development of the site would be acceptable.
- 3.2 The Council's SHLAA (2018) and Development Frameworks document (2018) identifies a number of site constraints and opportunities including landscape and visual impact; biodiversity; residential amenity; highways; and drainage.
- 3.3 The submitted technical assessments provide detailed responses although we have also sought to highlight the key issues below and provide clarity on the status of the constraints identified in the Development Frameworks document and the SHLAA.

#### **Landscape**

- 3.4 A Landscape and Visual Statement (LVS) has been undertaken which demonstrates that the visibility of the site from the surrounding area is relatively limited. The indicative masterplan for the site has been shaped by the Landscape and Green Infrastructure Framework drawing which identifies the key landscape considerations and design opportunities. The LVS also outlines how development at the site could deliver new green infrastructure which would strengthen the local and city-wide networks and therefore contribute to delivering other CSDP objectives.

#### **Archaeology and Heritage**

- 3.5 Durham University Archaeological Services has undertaken a review of the above and below ground heritage considerations at the site, which is submitted and summarised in the Technical Summary Document. In terms of heritage assets, there are several Grade II listed buildings located in the vicinity of the proposed site; however, none have a significant interrelation with the proposed development and their settings will not be affected. The Bowes Railway scheduled monument is over 650m to the west of the proposed development area and would not be affected by the proposals. With regards to below ground heritage there is no direct evidence of prehistoric or Roman activity within the study area.

#### **Ecology**

- 3.6 To advise on the ecological impacts, E3 Ecology undertook an initial scoping survey of the site and more recently completed a Preliminary Ecological Appraisal (PEA). The mitigation strategy proposed in the PEA aims to minimise the effects on biodiversity by avoiding significant negative impacts where possible through good design and developing approaches to mitigate any remaining unavoidable impacts. The proposals also provide opportunity for ecological benefit through habitat creation and supplementation and bat and bird box provision, contributing to local and national conservation targets.

### Movement

- 3.7 A Highways Appraisal has been undertaken by SAJ Transport Consultants to assess the access options, accessibility and traffic impact. The Appraisal confirms that a suitable vehicular access to the site can be achieved to serve the development. The Development Frameworks document states that the site lies within 800m of Springwell Village Centre (providing facilities including a local shop, community centre, public house and primary school) and is well served by public transport with bus stops located within 400m of the site providing regular connections to Nissan, The Galleries, Concord, Sunderland, Gateshead and Newcastle. This concurs with SAJ's assessment which concludes that the site is demonstrably accessible to services nearby and further afield.

### Drainage

- 3.8 In terms of flood risk, the site is located entirely within Flood Zone 1 although a narrow band through the site is subject to surface water flooding. The indicative layout does not include any properties in this area. A Flood Risk Assessment (FRA) undertaken by Coast Consulting Engineers has informed this indicative layout and the provision of SUDS would ensure the effective management of surface water.

### Summary

- 3.9 The studies previously carried out by Story Homes as described above show that the technical constraints of the site are capable of being mitigated, allowing the development of this sustainable site to be delivered.

### **(4.2) Are all the policy requirements within HGA2 necessary and clear to the decision maker?**

- 3.10 Policy HGA2 includes a number of sub points and requirements for development. Consistent with the submitted representations to the consultation on the Regulation 19 draft, our Client requests the following changes:
- i. deliver approximately 60140 new homes;*
- 3.11 This change is requested consistent with our view that land within HGA2 should be extended to include the currently identified as safeguarded. This would facilitate a comprehensively planned development.
- iv. ~~be of high architectural quality to protect~~ seek to retain long distance views to the southern edge of the development from the south.*
- 3.12 The requested change to sub point iv is needed to ensure the policy requirement is effective. A development high architectural quality may not necessarily result in protected long distance views, whereas the suggested amendment is less prescriptive.
- vi. include additional buffers, mitigation and/or design as necessary to address noise implications from the A194(M) directly bordering the eastern edge of the site;*
- 3.13 The above revisions to sub point vi are requested to allow flexibility in addressing any potential noise implications.

viii. retain ~~all~~ healthy trees and hedgerows where possible and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality; and

- 3.14 Whilst Story Homes intends to retain healthy trees and hedgerows, there is a need for additional flexibility in sub point viii to ensure the policy is effective and to allow for a planning balanced judgement in the event that the loss of some trees/hedgerows may be necessary (eg. to create the site access or internal roads).
- 3.15 With the above amendments, our Client considers that the policy requirements are justified and clear.

### **(4.3) Is the site deliverable?**

- 3.16 The site is suitable for housing, is available for development now, and is achievable as the site can be delivered within five years. The site also has the benefit of an end developer in Story Homes who has been actively promoting the site for several years. The site is deliverable in accordance with footnote 11 of the NPPF (2012) and capable of delivering within 5 years of the CSDP being adopted.

## **4.0 Infrastructure**

### **(9.1) Will the infrastructure to support the scale of development proposed in Washington be provided in the right place and at the right time, including that related to transport, the highway network, health, education and open space?**

- 4.1 Strategic Priority 13 of the CSDP is to 'ensure that the city has the infrastructure in place to support its future growth and prosperity.' and this will be delivered by policies 'ID1 Delivering Infrastructure' and 'ID2 Planning Obligations'. The CSDP is supported by the Infrastructure Delivery Plan (IDP) (SD.59) which sets out the infrastructure requirements associated with the development planned through the CSDP and discusses how planned provision will be delivered.
- 4.2 The IDP is informed by infrastructure providers and sets out the infrastructure projects needed to deliver the CSDP. The IDP considers the level of growth planned for the City, and whilst it considers the requirements arising from the development of the strategic development sites, this does not extend to the HGAs. The CSDP will be supported by the Allocations and Designations Plan, which will provide more detailed policy requirements for the allocated sites, including the HGAs. It is intended that the IDP will be updated regularly and that any requirements identified through the development of the Allocations and Designations Plan will be included in a future iteration of the IDP.
- 4.3 Further information regarding the requirements and associated solutions for specific types of infrastructure is provided in the evidence base which support the CSDP. Of particular relevance are:
- Sunderland Green Infrastructure Strategy (2018) (SD.46);
  - Greenspace Audit and Report (2018) (SD.47);
  - Sunderland Local Plan – Initial Assessment of Transport Impacts and the two subsequent addendums (2017-18) (SD.51, SD.52 and SD.53); and
  - Local Plan Education Planning Report (2018) (SD.62).

- 4.4 The CSDP is also supported by a series of Statements of Common Ground between the Council and Infrastructure providers. These, together with the evidence documents described above, provide assurances that, through continued joint working between the Council and providers, the necessary infrastructure will be provided in a timely fashion.

## 5.0 Delivery

### **(10.1) Are the assumptions about the rate of delivery of houses from sites in Washington realistic (anticipated delivery is shown in Appendices A., b, F and O of the SHLAA)?**

- 5.1 The SHLAA includes a delivery schedule at Appendix B for the Housing Growth Areas. The SHLAA (and CSDP) adopts a conservative approach anticipating that none of the HGAs will deliver within the first 5 years (2018-2023).
- 5.2 For HGA2, the SHLAA assumes that the site (60 dwellings) will deliver 30 homes in years 2024/25 and 30 homes 2025/26. Whilst our Client is satisfied that these delivery rates are realistic, there is a likelihood that the HGA2 site could deliver earlier in the plan period. Our client has also considered the scenario if the wider site (HGA2 together with the additional land currently identified under Policy SS3) comes forward, which is anticipated to be completed by the middle of the plan period.