

Sunderland City Council Response to Matters, Issues & Questions

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

1. The Housing OAN and Requirement

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

Section 6 of the SHMA (SD.23; pgs. 94-104) and Section 2 of the SHMA Addendum (SD.24; pgs. 4-14) set out in detail how the housing requirement contained within the Plan has been calculated. As part of this calculation account was taken of demographic and economic factors, market signals and affordable housing need. Further detail is also provided within the Compliance Statement (SD.66; pgs. 38-56).

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

Other local planning authorities within the region are at different stages of the plan making process and are therefore preparing their plans based on different national planning policy guidance. The Council consider that the approaches taken by Newcastle/Gateshead and North Tyneside Councils who have adopted their respective Local Plan's since the publication of the NPPF (2012), are reasonably consistent with the approach undertaken by Sunderland City Council. Those plans were prepared against the 2012 Framework and associated practice guidance, which is the same guidance against which the CSDP has been prepared and will be assessed.

Other local planning authorities within the region are preparing their emerging plans against the revised Framework (2019) and associated PPG and are therefore taking a different approach which is consistent with more recent national guidance.

1.3 Should the housing requirement be higher:

To support job growth, including that at the International Advanced Manufacturing Park (IAMP).

As set out within the SHMA (SD.23; pgs. 99-101) and SHMA Addendum (SD.24; paras. 2.10-2.23), a significant uplift has already been accounted for within the OAN calculation to support job growth, including the majority of those anticipated on the IAMP. Paragraph 6.81 of the Compliance Paper (SD.66) makes it clear how the vast majority of jobs growth at the IAMP has been taken account of as part of this calculation and why it is not considered appropriate to further increase the housing requirement.

- a) *To support an uplift in Household Representative Rates for 25 to 44 age range and to help address the affordable housing imbalance.*

As set out within the SHMA (SD.23; para. 6.14; pgs. 97-98) and SHMA Addendum (SD.24; paras. 2.6-2.9) consideration was given to including an uplift in Household Representative Rates for the 25 to 44 age range and whether it was necessary to provide an uplift to the OAN to help address the affordable housing imbalance. However, it was not considered appropriate to do so.

- b) *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?*

As set out within the Compliance Paper (SD.66; para. 6.66; pg. 48), the housing requirement within the Plan has been calculated using a post EU Referendum employment forecast, therefore the Council consider that the impacts of Brexit have been taken into consideration. Bearing in mind that the outcomes of the Brexit process are still uncertain, it is considered that the Council has taken the potential impacts into account as much as possible at this point in time.

As the Plan was submitted during transitional arrangements, it is being assessed against the 2012 NPPF and associated Planning Practice Guidance. The housing requirement has therefore been calculated using this guidance and it would not be appropriate to utilise the standardised methodology. Further justification is provided in the Compliance Statement (SD66; paras. 6.91-6.92; pg. 56).

Notwithstanding the above, it should also be noted that that even using the standardised methodology, the guidance indicates that consideration should be given to whether it would be appropriate to plan for a higher level of housing need to support economic growth.

2. The Employment OAN

2.1 Does the evidence base support the OAN of at least 95 hectares of employment land?

The Employment Land Review (SD.37) and subsequent Employment Land Review: Post EU Referendum Forecasting Analysis (SD.38) provide the evidence base to support the OAN of at least 95 hectares of employment land. These documents both concluded the need for between 95 to 115 hectares of employment land; albeit the Post EU Referendum Forecasting Analysis does indicate some downward pressure towards the bottom of this range. Further justification is provided in the Compliance Paper (SD.66; paras. 6.99-6.106; pgs. 58-62).

3. Alignment Between Housing and Employment Requirements

3.1 Is there sufficient alignment between housing and employment requirements.

The housing requirement has been calculated utilising the same employment forecasts used for calculating the employment land requirements (Experian September 2016). It is therefore considered that the housing and employment requirements are aligned.