

SUNDERLAND CORE STRATEGY AND DEVELOPMENT PLAN EXAMINATION

The Strategy and Growth Area of South Sunderland

Response to Inspectors' Matters, Issues and Questions

Made on Behalf of the Church Commissioners for England

Matter 4 - Housing Land Supply

Introduction

- 4.1 Our Client has a land interest at South Ryhope. Representations have been made to each stage of the plan making process which have supported the proposed allocation of South Ryhope for residential-led development as part of the South Sunderland Growth Area (SSGA) (referred to as Phase 1). Representations have also been made to support the release of Green Belt land immediately to the south of this draft allocation for further residential development (referred to as Phase 2). The development of both parcels of land would provide a suitable and sustainable location to deliver up to 615 dwellings, a local centre and associated public open space.
- 4.2 Phase 1 is a draft allocation and benefits from planning permission which was granted in September 2017 for up to 450 dwellings and a local centre. Phase 1 has been marketed and a preferred housebuilder selected.
- 4.3 Phase 2 extends to 15.62ha; it remains within the Green Belt and is located immediately south of Phase 1. There is no physical delineation between the two. Ryhope Dene runs partly through the southern boundary, with trees located alongside. This provides a physical and defensible boundary to the remainder of the Green Belt to the south.
- 4.4 Representations made by our Client have been accompanied by technical work demonstrating the suitability of the Site and an Illustrative Masterplan has also been provided setting out how development within Phase 2 could come forward.

Issue 1: Components of Housing Supply

1.1 Will the up to date housing supply position be clearly shown in the Plan (base date of 31 March 2019)?

- 4.5 Our Client would expect to see the up to date supply position within the Plan.

1.2 Will the components of the housing supply that will meet the housing requirement be clearly shown in the Plan (Table 22 of the Compliance Statement refers)?

- 4.6 Our Client would expect the components of the housing supply that will meet the housing requirement to be set out within the Plan.

1.3 Is the small sites allowance of 50 dpa justified by compelling evidence?

- 4.7 Our Client considers that the small sites allowance of 50dpa is justified by evidence within the SHLAA (2018). Our Client also supports the Council's approach to not including windfall allowance in the five-year supply due to a lack of compelling evidence that windfall sites will consistently become available in the next five-year period.

1.4 Is the flexibility factor of 8.5% sufficient to ensure that the housing requirement will be met over the Plan period?

- 4.8 To assist delivery in the supply of housing sites and to ensure deliverability, the Council has identified an additional 8.5% supply above the OAN.
- 4.9 We do not consider that this is sufficient to ensure that the housing requirement will be met over the Plan period.
- 4.10 We recommend that the forthcoming Site Allocations Plan should allocate more sites than required to meet the housing requirements, as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and we recommend that 20% would be an appropriate buffer.
- 4.11 Our Client is concerned that without additional Green Belt release now, sufficient sites will not be identified within the Site Allocations Plan that can deliver the housing requirement over the Plan Period.
- 4.12 Our Client's Site is suitable, available and deliverable and can help to ensure that the housing requirement will be met over the Plan period.

1.5 Is the allowance for demolitions of 20 units per year justified?

- 4.13 The allowance for demolitions of 20 units per year is justified. Within the SHLAA (2018) evidence is provided to demonstrate high levels of demolitions between 2007 and 2013, with lower levels from 2014 to 2018. Historic high-levels of demolitions were due to significant housing stock clearance and renewal which are no longer anticipated to occur going forwards.

- 4.14 Discounting large-scale demolitions, the Council have demonstrated that there has been an average demolition of 22 properties per year.

Issue 2: The Housing Trajectory and HIS

2.1 Is the data that supports the Housing Trajectory (Figure 34) based on realistic assumptions?

- 4.15 Our Client questions whether the data that supports the Housing Trajectory is based on realistic assumptions.
- 4.16 For instance, our Client's Site benefits from outline planning permission for up to 450 dwellings. The Site was taken into consideration as part of the SHLAA (2018), under the reference 426A. In assessing the Site with planning permission, the Council considered it would only be able to deliver 30dpa from 2020/21, leaving 70 dwellings to come forward beyond the Plan Period.
- 4.17 This build-out rate is considered to be significantly lower than what could be anticipated to come forward from the Site. Draft Policy H1 sets out that it will seek to increase the supply of larger detached dwellings to ensure that the housing stock meets the needs and aspirations of the City's existing and future residents. The housing mix for Phase 1 was therefore specifically tailored to provide the type of accommodation required by local residents.
- 4.18 There is considered to be a strong local market for the type and range of accommodation which will be delivered and there are likely to be two outlets. A build-out rate of 60dpa on this Site would be wholly achievable.
- 4.19 A revised trajectory was submitted to the Council with our representations to the Publication Draft Plan which demonstrates that Phase 1 which benefits from planning permission could be completed by 2027/2028.

2.2 Will the HIS (when available) demonstrate that a five-year supply can be maintained through the plan period?

- 4.20 Our Client does not wish to make written representations to this question.

Issue 3: Five Year Housing Land Supply

3.1 Is the use of a 5% buffer to calculate the housing land supply position appropriate?

- 4.21 Paragraph 47 of the 2012 NPPF provides guidance of when 5% or 20% buffers should be used. Where there has been a record of persistent under delivery of housing, the buffer should be increased to 20%.

4.22 Based on completions and the housing requirement in the North East RSS and proposed in the Sunderland Core Strategy and Development Plan, there has been a record of persistent under-delivery. Since 2009, Sunderland have failed to meet their housing requirement. This therefore suggests that the use of the 5% buffer is not appropriate, and the 20% buffer should be applied.

3.2 Is the inclusion of 250 units from small sites justified taking into account the need to avoid double counting?

4.23 It is not clear whether the 50 units per annum small sites allowance includes sites which are identified within the Council's supply.

4.24 If small sites are identified within the list of deliverable SHLAA sites, then this number should be taken from the 250 small sites allowance to avoid double-counting.

3.3 Generally, are the assumptions about the delivery from commitments and allocations realistic taking into account past completions?

4.25 The SHLAA identifies a total of 136 sites as deliverable and developable over the Plan period with a total combined indicative capacity of 10,225 homes. Of these, 1,213 are pending approval or have not been submitted for planning. All sites with planning permission have been considered deliverable.

4.26 There is a lack of evidence for the assumptions about the delivery of these sites and taking account of Sunderland's persistent record of under-delivery it is realistic to assume that a number of the sites identified as deliverable and developable in the SHLAA will not come forward.

4.27 Whilst the SHMA notes that in recent years there has been an up-turn in delivery levels, this is some way impacted upon by the Council's extra care programme delivering high completions and so may be an artificial up-turn.

4.28 We therefore suggest that a 20% buffer is provided to allow for non-delivery.

3.4 Are lead in times and build out rates realistic?

4.29 Please refer to our response to question 2.1 above.

3.5 Will there be a five-year supply of deliverable housing sites on adoption of the LP?

- 4.30 The SHLAA calculates that the Council will be able to demonstrate a 5.6 year supply of deliverable housing sites. This is however based upon a 5% buffer, which we consider should be increased to 20% to take account of past under-delivery.
- 4.31 The SHLAA 2018 sets out the Council five-year housing land supply position for the period 1 April 2018 to 31 March 2023.
- 4.32 The five-year requirement for 2018/19-2022/23 is 3,725 dwellings based on the OAN requirement of 745 dwellings per annum. The Council claim that they have a five-year supply of deliverable housing sites totalling 4,120 dwellings. These are made up of:
- SHLAA deliverable units under construction: 991 units
 - SHLAA deliverable units with consent: 1,687 units
 - SHLAA deliverable units pending approval or with 'strong developer interest' and no planning permission: 1,213 units
 - Small sites: 250 units
 - Demolition forecast: -21 units.
- 4.33 As can be seen above, a high proportion of the Council's five-year supply is made up of sites which have not yet been approved planning permission or which have not been submitted for planning yet. It is unrealistic to assume that this number of units on sites without planning permission will be delivered within five years.
- 4.34 Furthermore, there is little evidence provided to support the deliverability assumptions of the Sites and so our Client would question whether there will be five-year supply of deliverable housing sites on adoption of the Local Plan.

Issue 4: The wording of the Policy SP8

- 4.35 ***4.1 Will Policy SP8 as worded be effective in ensuring the delivery of at least 745 dpa?***
- 4.36 Our Client welcomes the recognition that the *"Council will work with partners and landowners to seek to exceed the minimum target of 745 additional dwellings per year"*.
- 4.37 To ensure that the Policy is effective, our Client however considers that further Green Belt release is required. The Council has only applied a flexibility factor of 8.5% which we do not

consider to be sufficient to ensure that Policy SP8 can be effective in *“exceeding the minimum target”* (our emphasis).

4.38 *4.2 Should the policy refer to measures that would be implemented in the event of under-delivery against the minimum target or does the Housing Delivery Test contained within the 2019 Framework provide sufficient safeguards in this respect?*

4.39 The Housing Delivery Test will help to ensure that the standard methodology OAN is met. This is however lower than the proposed housing requirement and does not align housing growth with the Council's economic ambitions.

4.40 The Council will therefore need to effectively monitor the delivery of the Core Strategy's housing requirement. We suggest that the policy should refer to measures that would be implemented in the event of under-delivery against the minimum target.