

# Sunderland Local Plan Examination

## Burdon Lane Consortium - Burdon Lane

### Matter Statement 2 - Spatial Strategy and Related Policies

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Issued May 2019

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#### **1.0 The spatial distribution of development across the sub-areas**

##### **(1.1) Is the spatial distribution of development within the Sub-Areas clear from the Plan and justified?**

- 1.1 We respond to Matter 2 on behalf of the Burdon Lane Consortium (consisting of Taylor Wimpey, Persimmon Homes and Story Homes) (“our Client”).
- 1.2 The Core Strategy and Development Plan (CSDP) includes a detailed summary of the spatial context in Section 2 (Sunderland Today) which introduces the ‘five unique sub areas’: The Urban Core; Washington; South Sunderland; North Sunderland; and The Coalfield.
- 1.3 Paragraphs 2.13 to 2.16 provide context to the current circumstances in the South Sunderland sub area. It is the most populated sub area of the city and is served by a number of district and local centres. It is orientated towards the city centre and there are also key employment centres and transport links including the A19 within the sub area. Paragraph 2.15 states that South Sunderland is a popular residential area; it contains the largest proportion of the city’s housing stock and 47% of all deliverable and developable housing sites identified in the SHLAA (2018).
- 1.4 Paragraph 2.38 of the Plan describes how the existing stock is typically of a narrow range with 76% comprised of 2 and 3 bedroom homes and a notable shortage of 3 and 4 bedroom family houses and bungalows.
- 1.5 The Core Strategy and Development Plan (CSDP) comprises just part of the Local Plan and identifies the strategic sites (the South Sunderland Growth Area) and proposed Green Belt releases to deliver the majority of the identified housing requirement. The subsequent Allocations and Designations Plan (Part 2 of the Plan) is likely to contain further (non-strategic) housing allocations.
- 1.6 The South Sunderland Growth Area (SSGA) is the only source of housing supply identified in the South Sunderland sub area which is located outside of the Existing Urban Area. As set out in Policy SS6, the SSGA is identified for the delivery of approximately 3,000 new homes and therefore forms a key component (22%) of the housing strategy.
- 1.7 Paragraphs 4.24 – to 4.28 explain how the CSDP has sought to rebalance the distribution across the sub areas to ensure the needs of the entire city are met which requires the release of Green Belt land. Whilst this approach is welcomed, the Burdon Lane Consortium seeks to reiterate that the SSGA will play a crucial role in delivering much needed new housing in a desirable location. The SSGA is made up of four sites which includes two Unitary Development Plan (UDP) residential allocations and an employment allocation. The SSGA has therefore long been established as a suitable location for development.

- 1.8 The Burdon Lane Consortium considers that the distribution of housing across the sub areas is justified and that the SSGA will support the sustainable growth of the South Sunderland sub area. Notwithstanding the above, our Client considers that it would be helpful if the CSDP were to include a clear breakdown of the distribution of housing within each sub area.
- 1.9 Accordingly, our Client supports Policy SP1 (Spatial Strategy) but requests the follow revision to sub point 2(v) which should be addressed as a modification:
- v. delivering the right homes in the right locations through the allocation of homes in the A&D Plan, allocation of the South Sunderland Growth Area (SSGA) and amending the Green Belt boundary to allocate Housing Growth Areas;*
- 1.10 This amendment is required to ensure Policy SP1 includes reference to the SSGA for completeness.

## **(1.2) Has the spatial distribution had regard to the impacts on climate change, including CO2 emissions?**

- 1.11 Section 4 of the CSDP is clear that it responds to the underlying principle of national policy to deliver sustainable development (paragraph 4.1). Policy SP1(2) states that the spatial strategy seeks to deliver sustainable patterns of development; with emphasis on the sustainable locations in close proximity to transport hubs and by encouraging higher density.
- 1.12 The Existing Urban Area is unable to accommodate all housing growth and, as explained above, the SSGA has long been established as a suitable location for development. There are a number of existing district and local centres in the surrounding area and the SSGA has a strong relationship with the city centre. The SSGA will also provide residential-led development with provision of new services, facilities and open space to meet day-to-day needs and reduce the need to travel.
- 1.13 Our Client considers that the spatial distribution is an appropriate strategy which will deliver housing growth at accessible and sustainable locations and thereby limit the impact on climate change and CO2 emissions.

## **2.0 The split between the Existing Urban Area and elsewhere and between brownfield and greenfield land**

### **(2.1) Is the split between the Existing Urban Area and elsewhere and between brownfield and greenfield land clear from the Plan and justified?**

- 2.1 The Existing Urban Area is identified in the Key Diagram (Figure 12) and is the location where Policy SP1 (2ii) seeks to direct the majority of development.
- 2.2 Paragraphs 4.19 – 4.29 explain the sources of housing supply which will deliver the identified housing growth. Paragraph 4.22 references the SHLAA which “*has identified that approximately 13,233 new homes can be delivered in the Existing Urban Area on a mixture of brownfield (44%) and greenfield sites (56%)*”.
- 2.3 The CSDP is clear in the identification and justification of the allocated sites which are located outside of the Existing Urban Area. However, it is unclear from the key diagram where the brownfield and greenfield opportunities are. As the only way to investigate this is through a time-consuming review of the SHLAA (which is likely to be updated frequently), our Client considers that the Plan should ideally include a breakdown of the brownfield and greenfield

sites by sub area for ease of reference. Whilst this could be included in the CSDP, it could also be addressed in the subsequent Allocations and Designations Plan (Part 2 of the Plan).

### **(2.2) Has the Plan robustly explored the effective use of brownfield land to meet development needs?**

- 2.4 Section 2 (Sunderland Today) (paragraphs 2.47 – 2.48) describes the historic delivery on brownfield sites and also highlights the proportion of dwellings which could be delivered on the previously developed sites identified in the SHLAA. In particular, Figure 8 presents the proportion of housing completions on previously developed land. This has averaged 90% between 1995-2016 although the percentage of completions on greenfield sites has gradually increased since 2012.
- 2.5 Section 4 (Spatial Strategy) (paragraphs 4.19 – 4.32) further explains the Council’s approach to identifying previously developed sites and the distribution of housing. Paragraph 4.20 highlights that much of the remaining land is highly constrained through contamination or other factors which affects the viability of redeveloping such sites. Our Client supports the Council’s approach which only includes previously developed sites which have been assessed as being deliverable.
- 2.6 A key aim of the CSDP is also to meet the housing needs of the entire city and to address any shortfall in the type of housing available. Accordingly, the identification of sites should also take into account other factors including accessibility, sustainability and attractiveness to the market.
- 2.7 It is clear that the housing strategy could not be delivered using only previously developed sites and there is also a shortage of land more generally within the Existing Urban Area. The SSGA has long been established as a suitable location for development. It provides a key component of the housing strategy for the city and will allow for sustainable development in the South Sunderland Sub area.
- 2.8 Our Client considers that the Council’s approach is sound and achieves an appropriate balance between taking advantage of opportunities to reuse previously developed land and identifying sites which will meet the city’s housing need.

### **(2.3) Are there areas of brownfield land, including land identified as Key Employment Areas, that should be allocated for housing, taking into account employment land requirements and viability and deliverability issues?**

- 2.9 Our Client notes that the preparation of the Allocations and Designations Plan (Part 2 of the Plan) will consider non-strategic allocations in more detail.

## **3.0 Green Belt and Exceptional Circumstances (Green Belt alterations will also be discussed in relation to Housing Growth Areas during Week 2)**

### **(3.1) Has, in principle, exceptional circumstances been demonstrated for the alteration of Green Belt boundaries?**

- 3.1 The Burdon Lane Consortium does not wish to comment.

**(3.2) Is the methodology for Green Belt assessment reasonably consistent with that used by adjoining authorities?**

3.2 The Burdon Lane Consortium does not wish to comment.

**4.0 The principle of safeguarded land being identified to meet longer-term development needs (Green Belt alterations will also be discussed in relation to Safeguarded Land during Week 2)**

**(4.1) Is safeguarded land between the urban area and the Green Belt required to meet longer-term development needs?**

4.1 The Burdon Lane Consortium does not wish to comment.

**(4.2) Has enough land been proposed for safeguarding to meet longer-term development needs?**

4.2 The Burdon Lane Consortium does not wish to comment.

**(4.3) In general terms is the safeguarded land in the right place to meet longer-term development needs?**

4.3 The Burdon Lane Consortium does not wish to comment.

**5.0 The principle of ‘Settlement Breaks’ and the terms of Policy NE7**

**(5.1) Does the evidence base and, in particular SD.48, support the principle and general extent of the settlement breaks?**

5.1 The Burdon Lane Consortium does not wish to comment.

**(5.2) Are the provisions of Policy NE7 justified and consistent with national policy or are they too restrictive?**

5.2 The Burdon Lane Consortium does not wish to comment.

**6.0 Whether Policy NE8 is consistent with national policy.**

**(6.1) Is Policy NE8 consistent with paragraphs 17 and 109 of the Framework?**

6.1 Our Client recognises that the area of Open Countryside relates to a relatively small area of the City towards the south and west. Notwithstanding this, Policy NE8 could preclude development on sites which are sustainable; whereas the NPPF (2012) seeks a more flexible and positive approach.

6.2 As set out in our Client’s response to question 6.3, additional text is offered to ensure the CSDP is sufficiently flexible.

**(6.2) Is the Plan clear as to areas of ‘valued landscape’ and are these areas justified?**

- 6.3 The only reference to ‘valued landscape’ appears in CSDP paragraph 10.43 which simply refers to NPPF (2012) paragraph 109. The CSDP does not go any further than this reference, nor is there is any specific national guidance as to what might constitute valued landscape.
- 6.4 A valued landscape is a high bar and it should not be attributed to large swathes of land across the city. If there are any landscapes in the district which the Council considers to be ‘valued’, our Client considers that it would be helpful for the CSDP to identify these landscapes based on clear evidence. This would be provide clarity to all parties in decision making over the course of the plan period.

**(6.3) Should Policy NE8 allow for development sustainably located on the edge of settlements, particularly where there is a lack of a 5 year housing land supply?**

- 6.5 Our Client considers that to ensure the CSDP is flexible, and able to adapt to unforeseen circumstances, Policy NE8 should include the following additional text:
- “At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites, which are located entirely or partially within the Open Countryside, that would both make a positive contribution to the five year supply of housing land and be well related to existing settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the CSDP. Proposals that come forward under this mechanism should be of a scale that respects the physical size of the settlement.”*
- 6.6 This additional text is an adapted version of a Main Modification (ref. MM08) to Scarborough Borough Local Plan Policy HC1. Following the examination of the Local Plan, during September 2016, Inspector William Fieldhouse proposed a similar modification in his report (paragraph 139) dated 9 February 2017.
- 6.7 Our Client suggests including the above text to ensure the CSDP is positively prepared and effective. The additional text should be included to ensure a positive approach to the consideration of housing proposals of a scale and in locations well related to the settlement hierarchy if at any time during the plan period the Council is unable to demonstrate a five year supply of deliverable housing sites.