

Sunderland Local Plan Examination

Esh Developments Ltd

Matter Statement 7 - Strategies and Allocations for the Coalfield Growth Area

Issued 10 May 2019

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Esh Developments Ltd.
- 1.2 The site which is subject to Policy HGA10 lies adjacent to a much larger site which Philadelphia Estates have been promoting for development for a number of years, and the relevant context to that site is set out in a separate response relating to Policy HGA11.
- 1.3 Specifically in relation to the HGA10 site, Philadelphia Estates/Esh Group have an option contract in place to acquire the site and develop it for residential purposes, subject to the grant of planning permission.
- 1.4 Philadelphia Estates are strongly supportive of the Council's proposed deletion of the HGA10 site from the Green Belt and its allocation for housing development and, while many of the questions raised by the Inspector are for the Council to respond to, we are pleased to supplement this by our own responses to the questions as set out below.

2.0 Matter 7: The Strategy and Housing Growth Areas for the Coalfield

(5.1) 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 sites would be acceptable?

- 2.1 Our client supports the allocation of land at New Herrington Workmen's Club for residential development. The site does not currently contribute to the five purposes of the Green Belt and is a suitable and sustainable site which will contribute towards meeting the Coalfield's housing needs. This vacant, underused brownfield site is well integrated into the existing pattern of urban development that surrounds the site, with good access to public transport and local amenities.
- 2.2 The Council's SHLAA (2018) identified several potential constraints to development, including Tree Preservation Orders, Bats and the Green Belt. These and other potential constraints are discussed in turn below:

Landscape and Tree Preservation Orders

- 2.3 The site is defined by the tree line to the south; the urban landscape to the west, north and east; and the semi-urban sport facilities and public open spaces to the south beyond the tree line. The site is therefore well-defined.

2.4 The Council's SHLAA highlights the existing Tree Preservation Order (TPO) on the site. The Preliminary Tree Investigation suggested these protected trees do not provide public benefits in respect of amenity value. The investigation also advised that some trees within the centre of the site and along the southern and east boundaries are of poor condition and as such can be removed.

2.5 The investigation observed that the trees along the northern boundary facing onto Kitchener Terrace hold the greatest amenity value and they would be retained as part of the site's redevelopment.

Heritage

2.6 The only building of any heritage value within the site is a post-war non-designated heritage asset with modern features situated on the western side of the site. The building is of limited heritage value, and it is not currently anticipated that the building would need to be retained as part of the site's redevelopment.

Biodiversity

2.7 The site's limited ecological value lies in its bat roosting and foraging potential. Ecological surveys will be undertaken and mitigation proposed at the time of any planning application submission.

Drainage

2.8 The site lies within Flood Zone 1 as identified by the Environment Agency and as such is at the lowest risk of flooding. There is sufficient land on site to provide any required surface water run-off mitigation as necessary, which would be incorporated into the design of the development.

Transport

2.9 The existing access to the west can accommodate the vehicle trips for 30 dwellings with improvements as necessary. There is also scope for a potential access from the north east corner of the site from Kitchener Terrace. The scale of development which can be accommodated on this site would only require local highways works as necessary.

Green Belt

2.10 Paragraph 134 of the NPPF sets out the five purposes of the Green Belt. The site's contribution to these purposes is set out below:

a) to check the unrestricted sprawl of large built-up areas

2.11 The site is surrounded to the west, north and east by residential development. To the south is existing public open space including sports facilities, which are set to be retained in the emerging Plan. The site therefore makes no contribution in terms of checking unrestricted sprawl.

b) to prevent neighbouring towns merging into one another;

2.12 As set out above, the retention of the existing public open space to the south of the site would prevent sprawl to the south. The development of the site would not lead to the merging of the built-up area of New Herrington to the north and Newbottle to the south. Therefore the site makes no contribution to this purpose.

c) to assist in safeguarding the countryside from encroachment;

2.13 Much of the site has been developed and it cannot be considered to be ‘countryside’. Furthermore, as set out above, the retention of the existing public open space to the south of the site would prevent sprawl to the south. Therefore, the site makes no contribution to this purpose.

d) to preserve the setting and special character of historic towns;

2.14 There are no designated Conservation Areas in New Herrington – or any notable designated heritage assets or landmarks with a special character. The development of the site would therefore not have an adverse effect on the setting or special character of a historic town. As such, the site makes no contribution to this purpose.

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

2.15 The site comprises a derelict building and a disused bowling green, which is surrounded to the west, north and east by residential dwellings. The development of the site would include the regeneration of disused brownfield land which is well integrated with the surrounding existing pattern of urban development. As such, the continued protection of this site as Green Belt would not contribute to this purpose but release of it for residential redevelopment would.

2.16 Clearly, therefore, the site does not meet any of the five purposes of the Green Belt set out in paragraph 134 of the NPPF. The site makes a weak contribution to the Green Belt overall, and it would be entirely appropriate to amend the Green Belt boundary through the Plan process to enable the site’s redevelopment and regeneration.

(5.2) Are all the policy requirements within HGA10 necessary and clear to the decision maker?

2.17 Our client considers there to be a number of requirements that are considered disproportionate to a housing site for approximately 20 units as currently outlined, these are as follows:

- HGA 10 (i) this should be revised to approximately 30 dwellings;
- HGA 10 (iii) the exact location of the replacement club building is to be decided and could incorporate SCC land to the South. The location of the building has a direct relationship to the number of housing units achievable on the site and therefore the capital receipt to subsidise the replacement community building.;
- HGA 10 (iv) this should be amalgamated with (iii) as they are one of the same facility;
- HGA 10 (vi) this criteria is overly restrictive and should be deleted as it not necessary to be introduced as a policy requirement. Issues relating to trees and vegetation across the site should be considered at the time of, and in the circumstances of, a future planning application – and also in the context of development viability and the community benefits arising from the scheme as part of the overall ‘planning balance’.

(5.3) Is the site deliverable?

2.18 The site is suitable for housing, is available for development now, and is achievable as the site can start to deliver within the first five years of the plan period. The site is deliverable in

accordance with the NPPF's definition in Annex 2 of the Framework, and capable of delivering within 5 years of the Plan being adopted.

(7.1) Are the assumptions about the rate of delivery of houses from sites in The Coalfield realistic (anticipated delivery is shown in Appendices A, B, F and P of the SHLAA)?

- 2.19 This site is anticipated to be delivered within the first five years following the Plan's adoption and will be delivered within the Core Strategy and Development Plan period.
- 2.20 There is market interest to deliver the site.
- 2.21 This phase of development can deliver a range of house sizes and tenures, including affordable housing.

3.0 Conclusion

- 3.1 Philadelphia Estates strongly support the proposed release of the HGA10 site from the Green Belt and its allocation residential development. The site does not meet any of the five purposes of Green Belts set out in the NPPF and the Local Plan provides an appropriate and important opportunity for the Green Belt boundary to be reviewed. The site is not subject to any constraints which cannot be addressed or mitigated and is capable of early delivery, within the first five years of the plan period.