

Sunderland Local Plan Examination

Philadelphia Estates 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/Philadelphia Estates Ltd, who are a wholly owned subsidiary of Esh Group.
- 1.2 The site which is subject to Policy HGA11 forms part of a wider site (the Philadelphia estate) which has a long and complex planning history. The subject site was subject to a planning application in 2012, which the Council were “minded to grant” in 2013, which sought planning permission for the redevelopment of the wider Philadelphia estate, though that part of the site which is subject to HGA11 was later removed from the application. The removal of the HGA11 land reflected discussions with the Council at that time, and the “call-in” of the application by the Secretary of State. It was thereafter agreed that the appropriate time to review the Green Belt and Phase 6 (the HGA11 land) would be through a future Local Plan Review. This then allowed phases 1 to 5 to progress through planning and significant work to begin on delivering the site, overcoming the technical constraints.
- 1.3 While the issues raised by the application for the wider site were complex, reflecting the former use of the site for mineral-working and industry, outline planning permission was ultimately granted for residential re-development of the site (500 homes) in June 2016 (the Council were minded to grant permission in 2014 but it took some time to complete the S106 agreement). The permission granted includes provision for early delivery of key infrastructure, and more specifically the new A182 to B1286 link road which is a major strategic highway improvement supported by the Council.
- 1.4 While there have been a number of issues to resolve since the grant of outline permission, particularly in respect of ground conditions and remediation, good progress has now been made and Philadelphia Estates expect to exchange contracts with two housebuilders later this month, which will be followed by the submission of reserved matters details before 10 June (which is the deadline for submission of reserved matters details for Phase 1a under the terms of the outline permission). As currently envisaged, the reserved matters submissions to be made will seek approval for 487 new homes. The other 13 units are to be provided by the registered provider, Durham Aged Mineworkers Association, as affordable homes – and indeed reserved matters approval has been granted and construction has commenced on this element of the scheme.
- 1.5 Philadelphia Estates remain strongly supportive of the Council’s proposed deletion of the HGA11 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.

1.6 Throughout our responses below, we refer to the HGA11 site as 'Phase 6' of the overall Philadelphia estate development.

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 Philadelphia Estates support the Council's assessment that any constraints to development associated with the HGA11 site can be addressed or mitigated so that development of the site would be acceptable.

2.2 The Council's SHLAA (2018) identified a number of potential constraints to development. These constraints are discussed in turn below. It is, however, important to recognise from the outset that the HGA11 site is the least constrained part of the wider Philadelphia site, reflecting the fact that most of the site remains undeveloped. Detailed work was undertaken in 2012, when the application for the wider site was first submitted, which included consideration of the land which now comprises the HGA11 allocation, and no constraints were identified at that time which could not be satisfactorily addressed.

2.3 While there will clearly be a need to undertake updates to that work at the time of a planning application, there has been no significant changes to the character of the site or the surrounding area which would suggest that any different conclusion will be reached.

Landscape

2.4 As set out in the previously submitted Vision Document prepared by Philadelphia Estates Ltd (March 2018), the site falls away from south to north and ties into the relatively flat area of the former Philadelphia Complex. The 'Phase 6' site is likely to need some relatively minor re-grading, however the topography is not a constraint on development.

2.5 A Landscape and Visual Impact Assessment (2012) has been undertaken by Philadelphia Estates to understand the impact of developing Phase 6 on the wider landscape. The assessment concludes that the introduction of a new landscape buffer defining the edge of development could be beneficial. This buffer will provide a further benefit by providing a new recreational link which connects the residential area of Newbottle to the south and New Herrington to the North, incorporating access to the New Herrington Recreational Park and local authority playing pitches. In landscape and visual impact terms, with the mitigation proposed, Phase 6 will be perceived as an integrated extension to the existing pattern of development.

2.6 The proposed boundary to the HGA11 allocation works with the existing site levels, creating an earth-bunded recreational walkway along the natural ridge where the housing land is at a lower level, falling away toward the main Philadelphia site. This will ensure that negative visual impacts can be avoided and also that a new and defensible Green Belt boundary is established which will ensure the long term protection of the Green Belt beyond.

Heritage and Archaeology

2.7 The Philadelphia complex contains two areas of listed industrial buildings, one to the north east and one to the south, which is nearest Phase 6. The extant permission will sensitively restore and re-use these buildings, bringing significant heritage benefits in the form of a suitable

beneficial use for these buildings. Phase 6 itself does not contain any heritage assets and is sufficiently separated by intervening land uses, namely the extant residential development.

- 2.8 As part of the historical assessment of the Phase 6 site geophysical surveys have been completed. These surveys did not identify any notable archaeological features. Any future development would require a scheme of trial trenching to be agreed with the County Archaeologist, however there are no indications that this would preclude development.

Ecology

- 2.9 A Phase 1 Habitat Survey Report has been undertaken and this concluded that while there were features suitable for supporting roosting bats within the trees on site, foraging potential was limited due to its poor connectivity. Recent up to date ecological surveys on the adjoining extant Philadelphia site have not given rise to any constraints that would preclude development.

Highways and Accessibility

- 2.10 The approved highways and accessibility infrastructure across the Philadelphia estate was designed to accommodate residential development on the Phase 6 when first designed in 2012.
- 2.11 Implementation of Phase 6 will deliver the opportunity to complete footpath and cycle networks around and through the site, specifically the link running along the southern and eastern edge.
- 2.12 The previously submitted highways note by SAJ Transport Consultants (March 2018) has assessed the projected trip generation from Phase 6 which shows that trips will be dissipated across the wider road network. Whilst detailed impacts will need to be assessed through a Transport Assessment, the level of trip generation and distribution is considered unlikely to have a severe impact on the surrounding road network.
- 2.13 Furthermore, development of the Phase 6 site will bring significant benefits in terms of non-vehicular transport and would increase the catchment and commercial viability of bus services using the new link road. The enhancements to pedestrian and cycle links will be beneficial to new and existing residents.

Flood Risk and Drainage

- 2.14 The site lies wholly in Flood Zone 1 and the drainage strategy for future development has been designed to tie into the principles approved within the extant development at Philadelphia.
- 2.15 The Drainage Statement carried out by 3e Consulting Engineers for Phase 6 explains how the surface water from the new development will be discharged. The site has the potential to incorporate various sustainable urban drainage features, including infiltration trenches, porous paving and swales, to control surface water flows and provide improvements to water quality.
- 2.16 Foul water from 'Phase 6' will discharge into the infrastructure provided within the main site, via connections into the extant development at the Philadelphia Complex.

Coal Mining Legacy

- 2.17 There are no known coal mining constraints that would preclude development of the Phase 6 site. There is a former mine entry within the extant Philadelphia development site but this does not impact on the Phase 6 site. As with the majority of development in the former coalfield, groundwater risk will need to be considered at the detailed design stage but this does not preclude development coming forward.

Noise

- 2.18 As part of the 2012 application a Noise and Vibration chapter was produced to inform the Environmental Statement submitted with the 2012 application. This assessment included the Phase 6 site. The noise assessment concluded that the impact of development within the Phase 6 area is acceptable and that this part of the wider Philadelphia site experiences the lowest decibel levels from surrounding noise sources. A noise assessment would be provided as part of a future planning application submission but should not require any embedded mitigation.

(5.2) Are all the policy requirements within HGA11 necessary and clear to the decision maker?

- 2.19 This is a question for the Council to respond to, but Philadelphia Estates Ltd supports Policy HGA11 and the 10 policy criteria associated with it.

(5.3) Is the site deliverable?

- 2.20 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.
- 2.21 Table 1.0 below sets out the expected delivery trajectory of the site:

Table 1.0 – Expected Housing Delivery Trajectory

Site	2015-2020	2020-2025	2025-2030	2030-2033	Overall
Philadelphia Complex	50	175	175	100	500
Phase 6		75	75	45	195
Total	50	250	250	145	695

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

- 2.22 The Council's Site Assessment notes that Phase 6 is a sustainable site and that the wider Philadelphia complex will provide additional facilities. In addition to approximately 500 homes, the extant permission will deliver a range of facilities which will markedly increase the provision and quality of services, facilities and employment space in the area – including learning and enterprise building, a food store and a range of other retail and commercial facilities. The housing in Phase 6 will support these services in providing a wider catchment area whilst also ensuring that the new homes are well situated to benefit from the creation of these new facilities.
- 2.23 The delivery of an additional 195 homes within Phase 6 will support the commercial viability of local bus services and contribute to the feasibility of new routes utilising the new link road through the former Philadelphia Complex.
- 2.24 The front-loading of the link road as part of the first phase of the extant development site ensures that Phase 6 has the necessary road and highway infrastructure in place prior to the commencement of development.

- 2.25 With regards to education provision, Philadelphia Estates is committed to providing a developer contribution towards any shortfall in provision where this is evidenced and fully justified.
- 2.26 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.
- 2.27 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).

(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)?

- 2.28 Phase 6 will be delivered as part of the wider Philadelphia Complex and is capable of delivery relatively early in the development. In the context of delivery timescales for infrastructure serving Phase 6, construction is anticipated to begin around 2023. It is anticipated that labour will be assigned to phase 6 during the build of the previous five phases to shorten setup times and delivery of the first units.
- 2.29 Discussions with housebuilders for all phases of the Philadelphia development are at an advanced stage moving toward submission of reserved matters and there is strong market interest to deliver the extant homes then moving into Phase 6 once access becomes available through the wider site.
- 2.30 This phase of development can deliver a range of house sizes and tenures, including affordable housing, supporting a build out rate of approximately 15 dwellings each year (alongside around 35 dwellings per year across the wider site. In total therefore, the HGA11 allocation will help to ensure delivery of around 50 dwellings per year between 2020 and the end of the plan period.

3.0 Conclusion

- 3.1 Philadelphia Estates strongly support the proposed allocation of the HGA11 site for residential development. The site is not subject to any constraints which cannot be addressed or mitigated and is capable of early delivery; indeed, alongside the wider Philadelphia estate site it will make a significant contribution to housing delivery throughout the remainder of the plan period.