

Frequently Asked Questions

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1. What is a Local Plan?

The Local Plan is the statutory development plan for the city – our current Local Plan is known as the Unitary Development Plan (UDP). The Local Plan sets the spatial planning policies, guidance, land use designations and development site allocations for at least a 15-year plan period against which all planning applications and development proposals in the city are assessed. It sets the formal legal framework for sustainable development patterns and lays the foundations for enabling regeneration and economic growth, whilst protecting our most valuable built and natural environmental assets. Through this plan-led approach it seeks to ensure we get the right developments in the right place at the right time, and also for the right cost too.

2. Why do we need a Plan?

By law, all local councils must prepare and adopt a long-term development plan for their area and keep it up-to-date, setting out how much and where land can be developed to meet the future needs of local people and businesses. Once adopted, our Plan will form the basis for how we assess all planning applications. It will give a degree of certainty to developers and members of the public as to where development is likely to take place and guide decision makers on the most appropriate forms of development over the plan period to 2033.

3. What happens if we don't have a Local Plan?

Our current Unitary Development Plan (and subsequent Alteration No.2 for Central Sunderland) is becoming increasingly out-of-date. Without an up-to-date Plan, we can't show how we have enough land for new homes and jobs, and this puts our environment at risk from developers. This means that when developers apply for planning permission in areas we all want to protect, the council cannot so easily justify refusing permission as planning decisions are effectively taken out of the planned control of the council and instead simply determined against the Government's National Planning Policy Framework (NPPF) and its 'presumption in favour of sustainable development'. So, development happens in an uncoordinated way, rather than the council together with local communities being able to sensibly plan ahead for where things should most appropriately go in a strategically joined-up way that best meets the city's current and future needs and makes sure that new homes are created alongside the right local services, infrastructure, green space and jobs. And without land for businesses to grow, new jobs and investment will go elsewhere.

4. What key challenges is the council trying to tackle?

Evidence suggests that there is a requirement for a further 13,410 homes to be built in Sunderland up to 2033. Tackling the national shortage of new homes is also a key priority of the current and previous Governments. There is also a need to decide: how our town centres and employment areas should develop; how we should tackle high levels of deprivation; and to plan positively for the social, economic and environmental future of Sunderland. Further details of the challenges faced by Sunderland are given in the council's evidence base, available at www.sunderland.gov.uk/csdp

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5. How many new homes are needed?

13,410 new homes (net additional) need to be provided within the city by 2033.

6. Why do we need to build 13,410 houses?

The Local Plan needs to meet the requirements of the National Planning Policy Framework (NPPF). One of the requirements of the NPPF is for local authorities to significantly boost the supply of housing, as far as is consistent with the other policies in the NPPF.

The Plan also has to ensure that enough land is available to meet the housing needs of the city (often referred to as OAN, objectively assessed need). The city continues to lose population, particularly young family-forming households, to its adjacent authorities and yet they commute back into the city to work, which is not a sustainable option. The key reason for this loss is a lack of suitable housing in the right location. Hence the city needs to deliver sites which have high quality environments to encourage the development of larger family homes. Few such sites currently exist in the city.

By ensuring land is available to enable 13,410 new homes to be built, existing and future residents of the city will have choice in where they live and in the type of house they choose to live in.

7. How is the number of houses required calculated?

The calculation of Sunderland's future housing needs is set out in the Strategic Housing Market Assessment (SHMA). This is a technical document produced on the council's behalf by external independent experts that identifies the housing need in Sunderland and explains how it has been calculated.

The number of houses required – known as the objectively assessed housing need – has been calculated based on the Government's latest sub-national population projections published by the Office for National Statistics

The calculation used is consistent with national guidance set out within the Government's published Planning Practice Guidance.

8. What is a SHLAA?

A SHLAA is a Strategic Housing Land Availability Assessment and it identifies the future supply of housing and the sites that are expected to deliver housing in an authority area over a 15 year period. The SHLAA is updated annually.

Local councils are required to identify a 5-year housing land supply of suitable deliverable sites that are available now and achievable to develop within the next 5 years. The SHLAA identifies the 5 year housing land supply.

9. How were the sites identified?

Sites can be put forward for consideration in the SHLAA by anyone or any organisation. Typically they have been promoted by landowners, developers, agents, local businesses and individuals. A number of council-owned sites were also put forward. These were then assessed by the council in line with the Sunderland SHLAA Methodology, to determine if they were suitable for housing development.

10. What are the criteria used to identify/assess potential housing sites?

Sites are assessed against a wide range of criteria to determine their overall housing potential, including numerous environmental designations (eg. wildlife habitats and heritage assets) and physical restrictions (eg. utilities). This enables realistic assumptions to be made regarding a site's suitability, availability, achievability and economic viability to be taken into consideration. The approach follows standard national and regional guidelines and is set out in the Sunderland SHLAA Methodology.

11. How many houses can the land identified through the SHLAA accommodate?

The current 2017/18 SHLAA identifies potentially suitable land for future housing development with an indicative capacity for about 10,527 dwellings over the plan period.

12. Where has this land been identified?

28% of the housing land supply is within the Coalfield, 7% is within Central Sunderland, 47% in Sunderland South, 11% in Sunderland North and 7% in Washington.

13. How much of the housing land supply is brownfield and how much is greenfield?

43% of the supply is on previously-developed 'brownfield' sites and 57% is on greenfield land.

14. Where should new housing go? Why can't more development be built on brownfield land?

The re-use of previously-developed 'brownfield' land remains a priority for the council, with over 80% of all our housing completions in recent years on such sites. However, there is only a finite supply of this type of land in sustainable locations. All brownfield sites potentially suitable for residential development have been accounted for and are included in the SHLAA schedule of potential housing sites.

Whilst there remains a number of major brownfield sites across the city a number of these sites are not available in the short term as a result of various physical constraints and the costs of bringing them back into use, meaning they are not viable for development. This means there is a shortage of housing land to meet the city's identified future needs, such that some previously-undeveloped 'greenfield' land needs to be considered for development. About 3,000 new homes are proposed to be built within the South Sunderland Growth Area.

The council is in discussions with the landowners of many of the large brownfield sites, including Vaux, Groves, Philadelphia and the Gentoo sites of Pennywell, Ford & Doxford Park, to ensure that these sites are brought forward. All these sites feature in the SHLAA.

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15. Where and what is the South Sunderland Growth Area?

The South Sunderland Growth Area (SSGA) is one of two proposed Strategic Sites in the Core Strategy. The area lies between Doxford Park and Ryhope and is made up of four development sites: Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. The area has the capacity to accommodate approximately 3,000 homes. A Supplementary Planning Document (SPD) has been prepared to help guide the future development of the area.

16. Is the council allocating areas of precious, prime agricultural land for housing development that should be used for growing food?

In developing the Local Plan we have tried to allocate as much housing on previously-developed 'brownfield' as possible. However, this would still not be enough to provide the amount of new homes required, which means we have had to also look at allocating some previously-undeveloped 'greenfield' land for possible additional housing developments. It is anticipated that about 43% of the planned homes in the draft Plan would be on 'brownfield' land. In accordance with Government guidance, we have sought to avoid/minimise any potential development on the most valuable, highest quality and most productive agricultural land.

17. Why can't all the empty properties be used for new housing instead of finding new sites?

There are currently about 3,600 vacant and empty homes in the city (about 2.9% of all housing in the city). About 2,600 of these are classed as long-term empty homes (ie. vacant for more than 6 months). These houses are empty for various reasons including: repossessions; those where the owners can't afford to sell due to negative equity; those where residents are living temporarily in care homes; those where the owner has passed away and the property is going through the probate process; second/holiday homes (investment properties); those where the owners are away in the armed forces; disused flats above commercial properties used for storage use; and those in a significant state of disrepair with too great a cost or lack of funding to renovate.

The council encourages owners to bring vacant residential properties back into liveable use; however the level of demand for new housing to meet the needs of the city's future population would still mean a need for building about 745 net additional new homes each year (ie. numbers after allowing for any demolitions or conversion losses that may take place).

18. Does the council have a five-year housing land supply?

The 2017/18 SHLAA indicates that the council does have a 5-year land supply in place. It has a supply of 5.6 years.

19. What about Brexit? Won't that reduce housing requirements?

It is not possible at this early stage to say exactly what the impact of the country's decision to leave the European Union will be and it is very difficult to fully understand the potential impacts of 'Brexit' at this stage. The council has nevertheless tried to take it into consideration as much as possible, and in an attempt to understand the potential impacts of 'Brexit' upon housing requirements in the city, the council has used a post-EU Referendum economic forecast when calculating its housing requirement. The situation will be kept under review to inform future reviews of the Local Plan.

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20. Where are these jobs coming from?

The jobs numbers contained within the plan are based on a post-EU Referendum jobs forecast from independent experts Experian. This considers long-term trends in jobs growth across a wide range of employment sectors and the likely changes in employment in each of these sectors in the future. The plan allocates a range of Primary and Key Employment Areas to support jobs growth. In addition, the International Advanced Manufacturing Park Area Action Plan (IAMP AAP) allocates a further 150 hectares of land to the north of Nissan for the creation of a new large-scale employment area. It is anticipated that the IAMP (approximately 60% of which is located within Sunderland, with the remainder in South Tyneside) will create approximately 7,850 jobs.

21. What is the difference between Greenfield land and Green Belt land?

'Greenfield' land is land that has not been previously built on (as opposed to 'brownfield' land that currently has or has previously had development on it). Residential gardens are regarded as 'greenfield' land, as well as parks/playing fields with pavilions on small parts of them.

Green Belts are a specific planning designation, typically designated around the outer edges of the country's major towns and cities to help council's manage urban sprawl in a sustainable planned manner, prevent settlements merging together, preserve the setting and special character of historic settlements and encourage the recycling of derelict and other urban land within towns and cities.

Green Belt is predominantly greenfield in nature but also cover various previously-developed 'brownfield' sites too, such as small hamlets and farmsteads, former colliery-related industrial land and Ministry of Defence properties. The quality of 'greenfield' land in the Green Belt, and the contribution that different parts play in serving the purposes and functions of the Green Belt, also vary from place to place.

22. Why does the Plan only identify Green Belt sites?

Green Belt land continues to be protected through the Government's new National Planning Policy Framework (NPPF) and there is a general presumption against new development on Green Belt land except in very special circumstances. Nevertheless, the NPPF also advises that (amongst other circumstances) the development of previously-developed 'brownfield' sites in the Green Belt, as well as limited infilling in villages, should generally be regarded as acceptable in locations where this would not adversely impact on the general openness of the Green Belt. Needing to provide sufficient land to meet the housing and employment land requirements of the city's future population may be regarded as an exceptional circumstance that would warrant a review of Green Belt boundaries – given the likely extent of land required, it is considered unlikely that we will have sufficient developable land (through the development of 'brownfield' and lower value 'greenfield' sites) within the current urban areas of Sunderland to sustainably provide for our identified development needs over the next 20-25 years.

Furthermore, the NPPF specifically requires local authorities to fully provide for their objectively assessed and identified housing and economic growth needs, as far as is reasonably possible, although Green Belt is stated as a possible exception to this rule. If we do not provide for our full growth needs then our new Local Plan could be at risk of being declared 'unsound' and not fit-for-purpose by the planning inspector at independent examination. This would mean the council would not be able to adopt it and thus leave the city with an increasingly out-of-date development plan and therefore open to planning decisions being instead made in accordance with the NPPF's 'presumption in favour of sustainable development' (which in itself would not prevent necessary Green Belt development from taking place if developers could justify its need as an overriding very special circumstance), rather than the council in partnership with local people being able to strategically plan and control what development happens where and when.

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The NPPF says that Green Belt boundaries can only be amended as part of a Local Plan and only in exceptional circumstances. When the Local Plan is examined by an Inspector, the council (and the landowners and/or prospective developers of the site) will need to prove whether or not there are exceptional circumstances. To be able to answer that question, the council needs to ensure it really understands the current Green Belt and how each part performs against the purposes of including land in the Green Belt.

23. What are exceptional circumstances and why hasn't the council decided if they exist yet?

The National Planning Policy Framework (NPPF) states that Green Belt boundaries can only be amended as part of making a Local Plan and can only be done so in exceptional circumstances. The Government does not provide any guidance as to what would be an exceptional circumstance, but it has said that unmet housing need alone is unlikely to be an exceptional circumstance. The council's evidence base, that supports the policies in the CSDP, includes a Green Belt Exceptional Circumstances Paper. This paper sets out fully why exceptional circumstances exist that justify the need for alterations to the Green Belt.

24. How have you chosen which Green Belt sites to release for development? What is the Green Belt Assessment?

The Green Belt Assessment is part of the evidence that allows the council to consider whether any exceptional circumstances exist. The Green Belt Assessment has been undertaken in three stages:

- **Stage 1 (Growth Options)** – during this stage, Sunderland's Green Belt was divided into 13 sub-areas, which were then broken down further into smaller 'fields'. The 'fields' were then assessed against the five Green Belt purposes set out in the NPPF. Some land parcels which performed a strong Green Belt function were then excluded from further consideration, while others were recommended to be carried forward for the next stage of assessment.
- **Stage 2 (Update of Stage 1)** – 'Call for Sites' review and Constraints Assessment) – this stage of work involved a review of Stage 1 to consider consultation responses, an assessment of specific sites put forward by landowners and developers through a 'call for sites' exercise, and a 'Category 1' constraints review (that is, whether the Green Belt was constrained by SSSI, RAMSAR, Flood Zone 3, SAC, SPA and other policy designations of national importance). This review excluded further parts of the Green Belt from further consideration.
- **Stage 3 (Site Selection)** – this report considered the overall deliverability of the sites taken forward from Stages 1 and 2. Each site was assessed against a range of suitability, availability and achievability criteria, and a conclusion was reached as to which sites were deemed to be the most appropriate for release from the Green Belt.

In addition to these assessments, a Green Belt Boundary Review has been undertaken to help determine the most appropriate, strong and robust Green Belt boundary to serve the city over the Plan period and beyond. This review recommends minor land additions and deletions.