

CABINET – 26 JUNE 2008

EXECUTIVE SUMMARY SHEET – PART I

Title of Report:

**SUNDERLAND CITY COUNCIL LOCAL DEVELOPMENT FRAMEWORK:
HOUSING ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (HADPD)
ISSUES AND OPTIONS: REPORT OF PUBLIC CONSULTATION**

Author:

Director of Development and Regeneration

Purpose of Report:

This report is to inform the Cabinet of comments received following the consultation exercise on the Issues and Options stage of the HADPD and agree the next steps.

Description of Decision:

Cabinet is requested to:

- i) Note the key issues received from the consultation exercise on the Issues and Options stage of the HADPD;
- ii) Agree the next steps to progress the HADPD

Is the decision consistent with the Budget/ Policy Framework? Yes

If not, Council approval is required to change the Budget/ Policy Framework

Suggested reason for Decision:

To progress the preparation of the Housing Allocations DPD of the LDF

Alternative options to be considered and recommended to be rejected:

The City Council has a statutory duty to prepare a Local Development Framework, The programme for preparation of the DPD is included in the Sunderland Local Development Scheme approved by Council in March 2007. Consequently no alternative options can be recommended.

Is this a “Key Decision” as defined in the Constitution?

Yes

Is it included in the Forward Plan?

Yes

Relevant Review Committee:

Environmental and Planning Review Committee

Planning and Highways Committee

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ISSUES AND OPTIONS: REPORT OF PUBLIC CONSULTATION**

REPORT OF THE DIRECTOR OF DEVELOPMENT AND REGENERATION

1.0 PURPOSE OF REPORT

1.1 This report is to inform the Cabinet of comments received following the consultation exercise on the Issues and Options stage of the HADPD and agree the next steps.

2.0 DESCRIPTION OF DECISION

2.1 Cabinet is requested to:

- i) Note the key issues received from the consultation exercise on the Issues and Options stage of the HADPD;
- ii) Agree the next steps to progress the HADPD

3.0 BACKGROUND

3.1 Since 1991, all local planning authorities have been required to prepare and maintain a development plan for their area. The Unitary Development Plan (UDP) for Sunderland (adopted in 1998) sets out the planning framework for the City until 2006. The Planning and Compulsory Purchase Act 2004, introduced major reforms to the planning system - principally, the replacement of UDP's with "Local Development Frameworks". Once adopted, the LDF will be the starting point in the consideration of planning applications for the development or use of land in the City. Furthermore, the LDF will be a key delivery mechanism of both the Sunderland Strategy and the Local Area Agreements.

3.2 The Local Development Framework is an umbrella title. In effect, it comprises a series of themed planning documents that must all pass through a set of statutory stages ie: -

- Issues and Options
- Preferred Options
- Submission
- Public Examination (before an independent Inspector)
- Adoption

3.3 The **Local Development Scheme** (LDS) or project plan outlines the timetable for preparing the various documents which will make up the LDF. The current LDS was published in March 2007.

At the heart of the LDF is the Core Strategy which will provide broad strategic policies for development and restraint (without being site specific). Members will be aware that Core Strategy Preferred Options draft was the subject of a formal consultation between December 2007 and February 2008. A report on the Core Strategy DPD also appears on this agenda.

- 3.4 The Housing Allocations DPD will take its 'lead' from the Core Strategy and will, in due course allocate land for housing sites and provide a suite of housing related policies. The Issues and Options stage of the Housing Allocations DPD is the first such stage in taking this document forward. It sets out a number of key issues and questions for consideration, which include, the scale, extent and priority of areas for new housing growth, the development of mixed-use sites, dwelling types and tenures, exceptions for developing on greenfield land, density levels, affordable and special needs housing and housing design and environments. The draft is intentionally not site specific (as governed by good practice). However, as part of the consultation the opportunity was also given for developers / landowners to put forward housing sites to be considered for inclusion in the next stage of the document's formal preparation (currently the Preferred Options draft).
- 3.5 The content of the document was subject to a city-wide consultation exercise which started on 31 October 2007 and ended on 10 February 2008. The consultation undertaken was in accordance with the requirements as set out in the City Council's Statement of Community Involvement (adopted 2006). The consultation process involved the following:-
- Press notices formally placed in the Sunderland Echo on 31 October and 7 November 2007;
 - Copies of documents and posters to all libraries and the consultation website went live on 31st Oct 2007. (The web page dedicated to the document received 558 hits throughout the consultation period).
 - Copies of all documents and an on-line questionnaire were available on the City Council's website;
 - Letters were sent to 233 stakeholders registered on the Council's database on 31st October 2007, with copies of the document sent to statutory consultees.
 - Copies of the documents and posters were displayed at 3rd floor reception and on the ground floor of the Civic Centre.
- 3.6 In addition to the above, a joint consultation exercise was undertaken between 31 December 2007 and 10 February 2008 between the HADPD and the Core Strategy Preferred Options document.
- 3.7 As part of the consultation exercise, exhibitions (both static and staffed), were held across the city in libraries, contact centres, shopping centres, supermarkets and sports centres. The exhibitions were advertised by general awareness posters being placed in 76 locations across the city.

3.8 Throughout the formal consultation period, awareness raising presentations were also made to and discussions held with the following:-

- Local Strategic Partnership (LSP) Joint Partnership Group
- LSP Management Group
- LSP Partnership Board
- North East Chamber of Commerce
- 'Local interest Groups'
- Home Builders Forum
- Sunderland Strategy Feedback Event
- Hetton Town Council
- Youth Parliament

3.9 Seven residents meetings were organised throughout the city during January and February 2008, in the areas proposed for housing growth (Roker, Seaburn, Fulwell/Washington/South Hylton/Chapelgarth/Ryhope/Fence Houses and Easington Lane). The format of the residents meetings included a presentation outlining the role of the Local Development Framework, a summary of the Core Strategy and Housing Allocations DPD, including the various growth scenarios applicable to the locality where the meeting was being held.

3.10 The Sunderland Echo ran two separate items in its January editions raising awareness of these documents and giving further publicity to all of the above events.

4.0 CURRENT POSITION

4.1 In response to the consultation exercise on the HADPD a total of 140 individual letters were received and 30 on-line questionnaires were submitted. Acknowledgement letters were sent out to all respondents and a 255 page schedule of the responses has been placed in all city libraries and on the dedicated web-page. A summary of the comments is attached as appendix 1. The full schedule of individual responses has been placed in the Members' Room and may also be read on the City Council's web site at <http://www.sunderland.gov.uk/housingdpd/> The main issues raised are set out below.

4.2 *Housing type and tenure:-* responses were varied and covered matters such as executive housing and housing for the elderly. It is clear that there is a need to ensure that a wide range of house types is provided in the city and that this reflects actual requirements. This should be based on robust evidence; the Strategic Housing Market Assessment (SHMA) will be valuable in this context. It is important that any policy is flexible to cater for a variety of circumstances.

4.3 *Greenfield/ brownfield land:-* responses were sought as to when greenfield land should be released for housing. There was a wide range of responses. There is a continuing need to protect greenfield land but its development could not be ruled out - in some cases it was suggested

that where it “performed” better than brownfield land in terms of promoting sustainable development, and provided its release was carefully managed it could provide opportunities where brownfield land was in short supply.

- 4.4 *Density*:- government guidance outlines standards for residential development (usually at a minimum density of 30 dwellings to the hectare), however the Council can promote different standards where circumstances dictate. A wide variety of responses were received. It was suggested that each site should be considered on its merits; policy should be driven by housing types and the site requirements, context and character of an area. Development at higher densities could be appropriate near rail and metro links.
- 4.5 *Affordable housing*:- current policy requires consideration of affordable housing as part of major housing developments (50+ houses). Whilst the need to specify a threshold for affordable housing provision was generally accepted, this was the subject of many responses. Generalising, there was a view that policy should be flexible and allow for negotiation and should be based on the evidence gained from the emerging Housing Market Assessment.
- 4.6 *Housing design/ environments*:- the matter of housing design drew specific comment. High quality design should be sought. Specific architectural styles should not be restricted to certain areas, need flexibility and choice. There is a need to encourage sustainable design and construction methods (BREEAM, Eco Homes). A policy restricting development within back gardens could be required.
- 4.7 *Gypsies and Travellers*:- The HADPD provided a list of possible locations for new site provision and a mix of responses were received as to where to locate gypsies and travellers should a need be identified, with no one location being favoured. Additional suggestions from the public included the City Centre and Seaburn/Roker/Fulwell –close to the boundary with South Tyneside.
- 4.8 In addition to comments on specific topics, representations were also received on the proposed growth areas along with feedback from the growth area meetings. The following gives an indication of the main concerns for each growth area.
- 4.9 *Seaburn/Fulwell/Roker*:- A comparatively large volume of comments were received resisting any more housing development within the Seaburn area. The main concerns related to the loss of open spaces, facilities and playing fields and the impact on access points and increased traffic generation. The key message was that the area should be developed for tourism and leisure, focussing on the seafront location and the local character and not developed for housing.

4.10 Other comments in relation to this area included:-

- Whether the services in the area could cope along with possible under use of resources elsewhere, resulting in negative impacts on other regeneration initiatives.
- A suggestion was put forward for the area to be developed for high growth (1,000 dwellings), but to include areas to the west (particularly Southwick).
- Sewage system may require upgrading.
- Possibly consider medium housing growth (500 dwellings) at low densities.
- Consideration should be given to housing on the former railway line, Newcastle Road- North Dock.
- No scope for new housing in this area to justify it as a growth area.

4.11 *Chapelgarth*: High growth was considered favourable for this area, with housing types being mainly family and executive dwellings. The requirement for schools and community facilities was also noted should housing be developed in this area, with a particular requirement for a church.

4.12 Other comments on the Chapelgarth area relate to:

- Developing housing to the capacity of the lower scenario (650 dwellings) is considered the favourable option for this area. However, further growth may need to be considered in order to provide for much needed road link to Ryhope.
- Social/affordable housing is also required in this area.
- Concerns with more development in this area resulting in loss of greenfield sites which is not very sustainable, with no justification made for their release.
- Large scale development would require an assessment of the existing surface water and sewer network.
- Measures need to be taken to protect amenity and wildlife habitat value within this area.
- Archaeological assessments and investigations need to be undertaken in this area.
- Development within this area should contain significant affordable housing provision to meet specific housing needs of the population.

4.13 *Ryhope*:- Comments vary from planning for low growth (1,111 dwellings) to planning for high growth (1,500 dwellings). The main issues relate to:

- Providing the required road link.
- Difficulties for sewage system if over 800 dwellings were developed
- Higher growth (1,500 dwellings) raises issues with market viability and delivering existing consented sites. Phasing would be required if this option was to be taken.

- Development within this area should contain significant affordable housing provision to meet specific housing needs of the population.
- The settlement break needs to be protected and open space. Woodland and the natural environment should be preserved at all costs.

4.14 *South Hylton*:- There was limited support for large scale new housing mainly due to the size of the village and residents wanting to retain the unique character of the village. It was thought that proposals should include the wider area, such as Ford.

4.15 Other comments for South Hylton relate to:

- Existing capacity constraint on sewage system, which may require upgrading.
- Concerns over adequacy of local facilities/loss of playing fields/amenity open space.
- Major concerns were raised over road infrastructure/poor access
- Sheltered housing was needed for the elderly.
- High growth will encourage links with public transport.
- There was no scope for the scale of housing options suggested or even having the areas proposed as a growth area/ as South Hylton is currently over capacity.
- There was also the suggestion that medium and high growth scenarios would conflict with other LDF objectives.

4.16 *Central Sunderland*:- Both planning for high growth (3,800 dwellings) and limiting the housing numbers to current planning consents (2,931 dwellings) were suggested as the best way forward, however comments also related to:

- Concerns with high growth (3,800 dwellings) relate to ensuring a mix of house types and avoid over reliance on flatted developments.
- There was a need to ensure the high growth scenario (3,800 dwellings) does not prejudice natural regeneration elsewhere or lead to under use of facilities.
- There should not be a limit on the capacity of this area.
- Concerns regarding development in or around the Candidate World Heritage Site.
- Improvements are required to public transport.
- Concerns over the South Central Sunderland area numbers not allowing sufficient free development to meet needs elsewhere.

4.17 *Washington*:- There was a mix of opinion as to whether Washington should accommodate the suggested scenarios for high growth (1,400 dwellings), medium growth (1,000 dwellings) and low growth (800 dwellings). However the main comments related to:

- Careful assessment needs to be given to existing infrastructure.
- The need for a railway system into Washington.

- Additional housing in Washington at the expense of further growth of Fence Houses
- High growth (1,400 dwellings) could open up new employment opportunities on existing allocations and help house prices.
- Washington is a good location for executive housing.
- Natural environment needs maintaining and protecting.
- Make use of greenfield industrial areas to accommodate growth.
- No scope for new housing in this area and no justification for being a growth area.
- Low growth (800 dwellings) would help reduce pressure on employment and open space land.
- Certain employment areas could be utilised for housing development.

4.18 *Fence Houses*:- There was general acceptance that new housing would be positive for the area, however, there is a need to ensure affordable housing is provided and facilities and services to accompany new housing. The main comments related to :

- The capacity limit on sewage and water system. Possible problems with sizing and drainage systems.
- High growth (1,000 dwellings) would not benefit from city's facilities and possibly lead to facilities on peripheral locations which will not be of benefit to whole city. Also concerns over benefits of increased population in this area flowing to Chester-le-street, rather than Sunderland.
- Concerns over appropriateness of the area being a growth area. Higher growth option (1,000 dwellings) may not allow adequately for new development elsewhere.
- High growth (1,000 dwellings) needed to enable a step change and meet regeneration objectives.
- Consideration must be given to cross-boundary relationship.
- Development should be limited to avoid greenfield development/protect Green Belt/maintain settlement breaks/preserve Great North Forest.
- Hetton is a more sustainable growth area.
- There is no over riding need for prioritising development in this location.
- Road and transport infrastructure do not support a high population.
- High growth (1,000 dwellings) makes use of PDL and Central Route, Rainton Bridge and encourage improvements to local shops and service provision.

4.19 *Easington Lane*:- Additional housing would be supported as it would bring benefits in the form of new facilities, however, concerns were raised over the amount of empty properties currently within the area. The requirement for a new by-pass was also seen as a key issue to aid regeneration and help with the traffic problems in the area main comments received were:

- The limited capacity on the sewage and water system. Possible problems with sizing and drainage systems.
- Low growth or around 1,100 dwellings as peripheral location to city would undermine potential of economic benefits.
- Demand in area is limited, high growth unrealistic.
- Development should be limited so as to avoid Greenfield developments.
- Concerns over the area identified as a growth area, Hetton is a more sustainable growth area.
- Preserve natural environment/ green open spaces.
- High growth would assist in regeneration of area and reflects consents and development framework proposals.
- Higher growth option may not allow adequately for new development elsewhere.

4.20 The consultation exercise also identified a number of other areas throughout the city which respondents thought should be considered for housing growth, however the number of responses were limited. These areas are set out in the summary attached as an appendix.

4.21 In addition to the specific comments on the growth areas, a number of comments were also received on housing locations in general. One of the main points stated by Government Office for the North East was that the growth areas are unsuitable for the DPD and should be established through Core Strategy, as this could result in additional dwellings being identified within specific sub-areas, which could exceed Core Strategy figures. This matter is subject of discussion with GO-NE.

4.22 Other points related to issues such as the requirement for all housing locations to be assessed for flood risk, and the growth area impacts on the strategic road network. A number of comments related to ensuring that consideration was given to particular assessments, guidance and action plans of different bodies. The requirement for community facilities and services, along with maintaining open spaces/ settlement breaks/open space and woodland were strong points that were made in relation to the location of housing.

5.0 NEXT STEPS

5.1 The responses received are currently being analysed and will be used to help inform the next stage of the document, the Preferred Options draft which is currently programmed for October 2008.

5.2 However, it should be noted that new Regulations are anticipated in June 2008 that will introduce a series of changes designed to streamline the LDF system further. It is understood that these Regulations will among other things remove the need for a formal Preferred Options consultation and introduce a two stage submission process. Without the specific detail, it is not yet clear as to how this will affect the existing LDF programme. However, regular discussions at Officer level with GONE

suggest that at this stage, some slippage to the adopted LDS will occur. It is therefore highly likely that amendments to the adopted Local Development Scheme will be required. Any such changes will be reported to Cabinet for approval at the appropriate time.

6.0 REASON FOR DECISION

6.1 To continue the process of preparing the LDF Housing Allocations DPD.

7.0 ALTERNATIVE OPTIONS

7.1 The City Council has a statutory duty to prepare a Local Development Framework. The programme for preparation of the DPD is included in the Sunderland Local Development Scheme approved by Council in March 2007. Consequently no alternative options can be recommended.

8.0 RELEVANT CONSULTATIONS/ CONSIDERATIONS

- a) **Financial Implications** – There are no direct costs arising from the reporting of representations. The main costs will arise from the Examination, which is scheduled for February 2010 and will be considered as part of the review of the Medium Term Financial Strategy covering 2009/2010 to 2012/2013. The City Treasurer has been consulted and his views incorporated into the body of this report.
- b) **Legal Implications** – The representations schedule has been prepared in accordance with the appropriate Planning Regulations. The City Solicitor has been consulted and his views incorporated into the body of this report.
- c) **Policy Implications** – The Housing policies will in due course become part of the statutory development plan for Sunderland. In this context the Policies will be taken into consideration in determining planning applications and will represent a guide for public and private investment. On approval by the Council the policies will, in the interim, be a material consideration in determining planning applications in Sunderland.
- d) **Implications for other Services** – None are identified at this stage. Any Service issues which emerge during consultation will be taken into consideration in preparing the DPD.

9.0 APPENDICES

LDF Housing Allocations Development Plan Document: Issues and Options – Summary of Responses to Consultation March 2008

10.0 BACKGROUND PAPERS

LDF Statement of Community Involvement November 2006
LDF Local Development Scheme March 2007

LDF Housing Allocations Development Plan Document: Issues and Options October 2007
LDF Core Strategy Preferred Options December 2007
Full schedule of responses to Issues and Options consultation - March 2008

Contact Officer: Joanne Scott 0191 553 1538

Joanne.scott@sunderland.gov.uk