

Strategic Plans
Sunderland Council
Civic Centre
Burdon Road
Sunderland
SR2 7DN

SENT BY EMAIL
planningpolicy@sunderland.gov.uk
11/02/2021

Dear Sir / Madam,

SUNDERLAND ALLOCATIONS AND DESIGNATIONS PLAN: REG18 CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Draft Allocations and Designations Plan Regulation 18 consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. We would like to submit the following comments upon selected policies within the Site Allocations and Development Policies consultation document. These responses are provided to assist the Council in the preparation of the emerging local plan. The HBF is keen to ensure that Sunderland Council produces a sound plan which provides appropriate allocations and policies for the area.

Policy H8: Housing Allocations

4. This plan seeks to allocate 5,326 dwellings including strategic site allocations at Riverside Sunderland (680 dwellings) and Washington Meadows (400 dwellings) and 57 non-strategic allocations for 4,246 dwellings.
5. Paragraph 4.1 states that the CSDP sets out a housing requirement to deliver at least 13,410 net additional dwellings over the plan period from 2015–2033. In order to ensure flexibility in the supply and ensure that the housing requirement can be delivered in full, a 10% buffer is applied to the requirement to help bolster the supply and guard against under delivery. This increases the housing requirement to 14,751.
6. Table 2 of the Plan shows the housing land supply (HLS), as follows:



Source	Dwellings
Housing completions to date (2015/16 to 2019/20)	3,998
Strategic sites allocated in the CSDP	2,070
Sites under construction	3,151
Small sites	650
Demolitions	-276
Housing allocations within this Plan	5,326
Total Supply	14,919

7. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period.
8. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Sunderland's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.
9. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

Viability Update Report (2020)

10. The HBF notes that the Viability Report has been updated and has been made available for consultation alongside the Plan. The HBF have attached a copy of their Viability Guidance Note for information, this document just highlights some of the common pitfalls and considerations when undertaking a viability assessment.
11. It is noted that there have been a number of updates including for example the construction costs. The HBF notes that the Update has used the lower quartile cost, it is not clear what the reasoning is for these lower costs being used. In the current climate where build costs have the potential to increase, due to impacts of Covid-19 and Brexit, the HBF would recommend that a cautious approach is taken and that the median build costs would be more appropriate.

12. The HBF also notes the uncertainty surrounding the S106 costs, with an assumption of £1,600 per dwelling being generally used, although other scenarios are tested. The HBF are concerned that this S106 figure is not sufficient as it is clear from the information provided in Table 7.2 that the S106s required by the Council are frequently above this level.
13. The HBF are also concerned by the results of the viability assessment shown in tables 12.3a-e which show that a significant number of the site typologies are not viable.

Future Engagement

14. I trust that the Council will find these comments useful as it prepares its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
15. The HBF would like to be kept informed of the progress of this Plan and the associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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