

Sunderland Publication Draft Core Strategy and Development Plan: Sustainability Appraisal incorporating Strategic Environmental Assessment

Non-Technical Summary

On behalf of **Sunderland City Council**



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	Name	Position	Signature	Date
Prepared by:	Helen Skimming	Graduate Planner	HS	24.05.2018
	Chris Moore	GIS Analyst	CM	
	Emma Brown	Economic Planner	EB	
	Lauren Park	Senior Planner	LP	
	Duncan Smart	Senior Planner	DS	
Reviewed by:	Duncan Smart	Senior Planner	DS	06.06.2018
	Cicely Postan	Principal Planner	CP	
	Mark Johnston	Senior Associate	MJ	
	Nick Skelton	Equity Director	NS	
Approved by:	Nick Skelton	Equity Director	NS	06.06.2018
For and on behalf of Peter Brett Associates LLP				

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1 Introduction

1.1 Introduction

1.1.1 This Non-Technical Summary (NTS) provides an overview of the Sustainability Appraisal (SA) for the Publication Draft Sunderland Core Strategy and Development Plan ('the Publication Draft Sunderland CSDP'). The SA is being carried out on behalf of Sunderland City Council (SCC) by Peter Brett Associates LLP (PBA) to help integrate sustainable development into the emerging Sunderland CSDP.

1.1.2 The following sections of this NTS:

- Provide an overview of the emerging Sunderland CSDP and the current Publication Draft Sunderland CSDP which this SA report accompanies;
- Describe the approach to undertaking the SA of the Publication Draft Sunderland CSDP;
- Summarise the findings of the SA of the Publication Draft Sunderland CSDP; and,
- Set out the next steps in the SA of the emerging Sunderland CSDP.

1.2 How to Comment on the Publication Draft Sunderland CSDP SA Report

1.2.1 The findings of the SA undertaken in respect of the Publication Draft Sunderland CSDP are reported within a SA Report, of which this is the NTS. The full SA Report, this NTS and the Publication Draft CSDP are being issued together for consultation from **15 June 2018 to 27 July 2018**. A suite of evidence base documents has also been published by SCC in support of the emerging Sunderland CSDP.

1.2.2 Comments on the Publication Draft Sunderland CSDP, the SA Report and this NTS can be made online through SCC's consultation portal at <http://sunderland-consult.limehouse.co.uk/portal>. Alternatively, comments can be submitted by email to planningpolicy@sunderland.gov.uk, or in writing to Strategic Plans and Housing Team, Sunderland City Council, Civic Centre, Burdon Road, Sunderland, SR2 7DN.

1.3 The Sunderland Core Strategy and Development Plan

Preparation Process

1.3.1 The first stage of the process to prepare the emerging Sunderland CSDP was a consultation on the Growth Options for the Core Strategy in 2016, followed by consultation on the Draft Sunderland Core Strategy and Development Plan ('the CSDP') in Summer 2017.

1.3.2 The emerging Sunderland CSDP has since evolved to take account of the representations submitted in respect of the Draft Sunderland CSDP (2017) and associated document (including the Draft Sunderland CSDP SA Report), relevant national policy changes and changes to the evidence base in the interim (e.g. small adjustments to Sunderland's objectively assessed housing need for the CSDP plan period).

Purpose and Proposed Content

1.3.3 Once finalised, the Sunderland CSDP will provide a clear picture of SCC's spatial expectations, ambitions and plan for delivering sustainable development across the SCC area over an 18 year period from 2015 to 2033. The document will also interpret national planning

policies within the local context and seek to guide future development across the SCC area. To achieve this, the Sunderland CSDP will set out an overarching vision and strategic priorities for the SCC area, which will be implemented through:

- A spatial strategy, supported by area based spatial policies;
- Strategic site allocations; and,
- A suite of development management policies.

1.3.4 Once adopted, the Sunderland CSDP will replace some of the existing statutory Development Plan for the SCC area and will be one of three Local Plan documents which together will comprise a new statutory Development Plan for the SCC area. The other two Local Plan documents are:

- The International Advanced Manufacturing Park Area Action Plan ('the IAMP AAP', adopted November 2017) already sets out a spatial framework and associated policies to guide the development of an advanced manufacturing complex on land to the west of the A19 and south of the A184, near the existing Nissan Motor Manufacturing (UK) site between Washington and South Hylton (Sunderland); and,
- An Allocations and Designations Plan ('the A&D Plan') will be prepared to allocate a range of non-strategic sites¹ to meet development needs established through, and to address the wider implications of, the Sunderland CSDP. Alongside the statutory Development Plan, a number of non-statutory Supplementary Planning Documents (SPD) will be prepared to provide further detail regarding specific aspects of the Sunderland CSDP, including some of the proposed strategic site allocations.

1.3.5 Under planning law, all planning applications must be determined in accordance with the statutory Development Plan unless material considerations indicate otherwise. Once adopted, the Sunderland CSDP will therefore form an important component of the planning policy framework applicable to the SCC area.

1.4 Sustainability Appraisal incorporating Strategic Environmental Assessment

Purpose

1.4.1 SCC is legally required to carry out a sustainability appraisal (SA) of the emerging Sunderland CSDP to help guide the selection and development of policies and proposals in terms of their potential social, environmental and economic effects. To comply with legislative and policy requirements, this SA must incorporate a Strategic Environmental Assessment (SEA) to identify and address likely significant environmental effects from the emerging Sunderland CSDP. SA and SEA share a common focus on assessing the environmental and wider sustainability performance of emerging plans and these statutory processes are best undertaken together.

1.4.2 A key objective of the SA process, incorporating SEA, is to enhance an emerging plan's environmental performance and contribution to the achievement of sustainable development. This is achieved through identifying any likely significant effects from implementation of the emerging plan components, proposing mitigation measures to address any identified significant adverse effects and identifying enhancement measures to improve the overall

¹ Strategic sites are those which raise strategic implications due to their large size, land use or location within existing Greenbelt or Settlement Break designations. Conversely, non-strategic sites are those which only raise local scale implications (e.g. proposed housing allocations already identified as potentially suitable housing sites within the Sunderland Strategic Housing Land Availability Assessment (SHLAA)).

effectiveness of the plan. As such, SA incorporating SEA is an integral part of good policy development and should not be viewed as a separate or retrospective activity.

Reporting

- 1.4.3 Using a series of appraisal matrices, a consultant team from PBA have carried out a SA, incorporating SEA, of all substantive components (e.g. proposed policies, proposed site allocations, etc.) within the Publication Draft Sunderland CSDP, as well as assessing any identified reasonable alternatives to these. This has been undertaken on an objective basis, without regard to whether individual candidate sites are preferred for allocation by SCC or not. However, to demonstrate compliance with SA caselaw, justifications have been provided by SCC and incorporated into the Publication Draft Sunderland CSDP SA Report to explain why individual sites are either proposed for allocation or have been rejected from inclusion in the emerging Sunderland CSDP.
- 1.4.4 The Publication Draft Sunderland SA Report, which this NTS summarises, comprises a main body of text (hereafter 'the main SA report'), supported by a suite of appendices. The main SA report focuses on reporting the likely significant effects of the Publication Draft Sunderland CSDP, whilst the appendices provide detailed assessments and other information as required to satisfy statutory requirements.

2 Environmental and Policy Context

2.1 Key Sustainability Issues

- 2.1.1 A summary of the key sustainability issues which need to be considered within the emerging Sunderland CSDP and the associated SA is provided in **Table NTS 2.1** below. Both the emerging Sunderland CSDP and this SA are focused towards addressing these sustainability issues.

Table NTS 2.1: Key Issues for the emerging Sunderland CSDP and this SA

Key Issues	Implications for emerging Sunderland CSDP
Social	
Ageing population	There is a need to plan to provide age friendly development in recognition of the ageing population in the City.
Outward migration of the working age population	There is a need to plan to provide more housing that will support the working age population; this includes larger family housing, to reduce the outmigration of the working age population. It is also important to ensure that the plan delivers sufficient new housing to meet identified needs.
Improve housing choice, in particular addressing the shortfall in affordable and larger family housing.	Seek to meet deficiencies in housing stock identified through the Strategic Housing Market Assessment (SHMA), in particular increasing the delivery of affordable and larger family housing to meet identified needs.
Poor educational performance post GCSE	Support improvements to the University and College.
Reduce crime and the fear of crime.	Promote good design and mixed use developments, to increase usage at all times of the day and improve passive surveillance.
Based on the 2015 Indices of Deprivation, Sunderland is ranked as the 37 th most deprived local authority in England.	Include policies to address deprivation within the City in order to significantly improve the cities IMD ranking.
Improve health and well-being of residents of the City.	Inclusion of policies to promote healthy lifestyles in order to promote health outcomes. This includes protection of green spaces used for leisure and recreation.
Environmental	
Need to reduce greenhouse gas emissions to help meet EU, national and local targets.	Plan positively for renewable forms of energy. Ensure good design to reduce energy demands of buildings. Promote sustainable patterns of development to reduce the distance travelled and promote modal shift towards more sustainable transport methods.
Reduce the risk of flooding	Direct development away from those areas at highest risk of flooding. Use available funding sources to mitigate flood risk in key areas.
Coastal Erosion and sea level rise	Seek to implement measures to reduce the rate of coastal erosion. Ensure development takes account of likely sea level rises and direct development away from low lying areas particularly at risk.
Improve waste management	Seek to push waste management techniques up the waste management hierarchy, with greater emphasis on reducing the amount of waste generated and increasing levels of reuse and recycling.
Improve ground water quality	Seek to introduce measures to improve groundwater quality, particularly in those areas where water quality is considered poor such as the magnesian limestone in the east of the City. Ensure that high standards of sustainable drainage systems (SuDS) are adhered to in any new development.

Key Issues	Implications for emerging Sunderland CSDP
Conserve and enhance important ecological and geodiversity sites.	Ensure policies seek to protect and enhance designated sites. Where impacts are unavoidable, appropriate mitigation should be sought. The plan should also aim to ensure adequate protection for the City's biological resources and protected species.
Retain Green Belt where effective.	Retain protection for the openness of the Green Belt. Where any Green Belt losses are proposed, it should be demonstrated that these are exceptionally justified and that all other reasonable alternatives have been considered first.
Preserve the Heritage Coast	Protect the undeveloped qualities of the Heritage Coast that falls within the City boundaries and neighbouring areas.
Enhance landscape character	Ensure that policies protect and enhance the City's rural and urban landscape, with particular emphasis to improve existing poorer quality environments.
Protect the historic environment	Seek to protect both designated and non-designated heritage assets based on their significance.
Economic	
Promote a strong and stable economy, creating jobs.	Ensure a strong focus on economic development within the Core Strategy. Ensure an adequate supply of employment land is provided in the right locations to support economic growth.
Balance the aims of promoting economic development and maintaining a high quality environment	Seek good quality design on employment sites, particularly new employment sites over which the plan has greater control.
Improve GVA through increased participation, increased productivity, and creating businesses.	Support economic growth in order to help reduce unemployment, create new businesses and increase GVA to help achieve the aspirational targets set out in SCC's Economic Masterplan.
Promote City for low carbon economy.	Ensure that the CSDP supports the move to a low carbon economy, in accordance with the NPPF, Sunderland Strategy, Economic Masterplan and the City Deal.
Make greater use of Nissan, the Port, University and employment land as engines for economic growth.	Utilise the economic advantages from Nissan, the Port and the University as growth drivers. The IAMP will seek to build upon the success of Nissan and make better use of its supply chain, whilst the Sunderland Strategic Transport Corridor should help to support the Port and regeneration of the urban riverside corridor.
Improve infrastructure to facilitate economic growth	Promote investment in infrastructure to support economic growth. Develop an Infrastructure Delivery Plan to identify infrastructure required to support the level of development envisaged through the CSDP and detail how this will be delivered.
Promote the City Centre for office development, particularly through the Vaux site.	Ensure the CSDP supports the redevelopment of the Vaux site as a driver for growth in the City centre in order to support the Sunderland Strategy, Economic Masterplan and the City Deal.

2.1.2 In accordance with the SEA Regulations, the detailed baseline analysis presented in **Appendix A** includes a review of relevant aspects of the environment and the environmental characteristics of the SCC area that are likely to be significantly affected by the emerging Sunderland CSDP. **Appendix A** of the main SA report also identifies the key characteristics of relevant sites designated at European level for reasons of biodiversity conservation, namely:

- The Northumbria Coast Special Protection Area (SPA) and Ramsar Site;
- The Durham Coast Special Area of Conservation (SAC); and,
- The Castle Eden Dene SAC.

2.1.3 A separate Habitats Regulations Assessment (HRA) Report has been prepared to assess the likely significant effects of the Publication Draft Sunderland CSDP on these European Sites.

2.2 Review of Plans, Programmes and Strategies

2.2.1 As required by the SEA Regulations, a review of relevant plans, programmes and strategies (RPP) has been carried out to inform this SA report and is provided in **Appendix B**. This RPP included a review of relevant national and European legislative requirements, as well as relevant international, national, sub-regional and local plans and strategies.

2.2.2 The RPP identified a large number of policy requirements, targets and relevant issues were identified as requiring consideration in the preparation of the emerging Sunderland CSDP and the associated SA process. Key issues identified pointed to the need for the emerging Sunderland CSDP to:

- Identify and plan to meet the development needs of the City over the period to 2033, including the allocation of key strategic sites;
- Deliver well-designed homes providing a range of sizes and tenures, including the appropriate level of affordable housing and large family homes;
- Stopping the out-migration of residents through delivering an improved housing offer within the City;
- Positively seek to allocate and safeguard sufficient employment land in appropriate locations, in addition to the International Advanced Manufacturing Park (IAMP), which will be delivered separately through an Area Action Plan;
- Reduce the need to travel, provide opportunities to travel by means that are capable of improving health and wellbeing such as cycling and walking;
- Seek to use development to deliver improved and expanded transport links, public transport and electronic infrastructure, such as superfast broadband;
- Seek to protect, enhance and, where necessary, increase outdoor sports facilities, parks and open spaces;
- Seek to protect heritage assets and sites of potential archaeological interest in ways appropriate to their significance. Specific protection is required for the potential World Heritage Site at St Peter's;
- Develop effective community engagement techniques to respond to the views of wider communities and facilities effective neighbourhood planning;

- Promote the efficient use of resources, including moving towards a low carbon economy, use of waste as a resource, energy efficient buildings, and appropriate renewable and low carbon energy;
- Seek to improve air quality and ensure that the Council continues to have no areas designated as Air Quality Management Areas (AQMAs);
- Ensure that there are no significant negative impacts on internationally and nationally designated nature sites;
- Give full consideration to the potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management;
- Seek ways to maximise Green Infrastructure coverage (linked areas of open space and wildlife corridors) and connectivity across a wide range of scales and increase ecosystems services including biodiversity;
- Seek ways to maximise the wider social and economic benefits of Green Infrastructure;
- Use land efficiently by prioritising the use of previously developed land. Consider soil quality and agricultural land classification when assessing potential development sites;
- Recognise the different landscapes within the City and their differing capacity to accommodate change; and
- Promote development that minimises landscape impacts and protects landscapes appropriate to their significance.

2.3 Evolution of Baseline Conditions in the Absence of the Sunderland CSDP

- 2.3.1 Taking account of the environmental information provided above, **Table NTS 2.2** below outlines the expected evolution of baseline environmental and socio-economic conditions in the absence of the implementation of the emerging Sunderland CSDP.

Table NTS 2.2: Evolution of the Baseline Scenario in the Absence of the Emerging Sunderland CSDP

Environmental Topic	Expected Evolution of Baseline Conditions in the Absence of the Emerging Sunderland CSDP
Air Quality & Climatic Factors	If the Sunderland CSDP is not implemented it is likely that demand for, and use of, motorised forms of transport would increase unchecked as physical development occurs across the SCC area, whilst opportunities to encourage transport modal shift to walking, cycling and public transport would be lost. Notwithstanding recent increases in the uptake of electric vehicles, it is likely that this traffic growth would result in increased fossil fuel combustion, carbon emissions and local atmospheric pollution, in particular greater release of particulate matter in areas of traffic congestion. This would act against wider policy efforts to decarbonise key economic sectors including transport and could lead to worsening air quality. As a result, despite currently having relatively good air quality levels, in future SCC could fail to meet their duties in relation to climate change mitigation and adaptation under the Climate Change Act 2008 and could be required to designate Air Quality Management Areas (AQMAs) to address areas of poor air quality.
Biodiversity, Flora & Fauna	To meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development could put pressure on biodiversity, including the loss and fragmentation of habitats, while increases in traffic and noise could disturb sensitive species.
Water	To meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development could put pressure on water resources and adversely affect the quality of the water environment.
Land & Soil	To meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development could lead to land contamination and soil erosion. Pressure for the development of new facilities, housing and employment generating uses could also lead to the loss of best or most versatile agricultural land.
Health	If the emerging Sunderland CSDP is not implemented and significant increases in both physical activity and active travel are not achieved, various health issues including obesity, inactivity and poor air quality, will continue to affect the population, causing increases in ill-health and potentially a reduction in life expectancy. Furthermore, to meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development could lead to the loss of areas of open space, reducing opportunities for physical activity.
Population	If the emerging Sunderland CSDP is not implemented, currently projected population growth levels within the SCC area may be insufficient to support the desired level of economic and employment growth, as higher population growth, targeted towards existing settlements, is required to support these

Environmental Topic	Expected Evolution of Baseline Conditions in the Absence of the Emerging Sunderland CSDP
	ambitions. At the same time, currently projected population growth is likely to increase demand public service provision, economic opportunities and transport infrastructure, which in the absence of the CSDP may have insufficient capacity to accommodate rising demand. Therefore, the absence of the Sunderland CSDP could result in development in unsustainable locations, prevent SCC from meeting identified population needs and could also impede the achievement of desired economic and employment growth.
Cultural Heritage	To meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development may add development pressure to sensitive areas of historic and/or archaeological interest, as well as undermining the character of conservation areas.
Landscape	To meet identified needs and facilitate continued economic growth within the SCC area there will be a requirement for new development and infrastructure, which in the absence of the emerging Sunderland CSDP could occur in inappropriate locations and/or at unsustainable levels. Construction of such development could have a significant negative impact on the landscape character of the SCC area, especially if additional new development were to be concentrated within the existing Green Belt, Settlement Breaks and areas of high landscape value.
Material Assets	Without the emerging Sunderland CSDP it is likely that a range of infrastructure proposals would not be delivered. This would adversely impact upon the implementation of SCC's Economic Masterplan (2010) and the Economic Leadership Boards 3,6,9 Vision and fail to meet identified needs to support a growing population.

3 The Sustainability Appraisal Process

3.1 Introduction

3.1.1 This section provides an overview of the SA process, incorporating SEA, which has been undertaken to date for the emerging Sunderland CSDP. In doing so the section explains the approach which has been adopted for undertaking the SA of the Publication Draft Sunderland CSDP.

3.2 SA Project Team

3.2.1 The SA (incorporating SEA) of the emerging Sunderland CSDP is being undertaken independently by Peter Brett Associates LLP (PBA) on behalf of Sunderland City Council (SCC). The consultant team involved in carrying out the SA is therefore independent of the CSDP preparation team within SCC, which helps to ensure the objectivity of the SA and to identify components requiring improvement throughout its development. The SA team within PBA has however held regular discussions with SCC officers to allow informal and early feedback of recommendations and ideas for improvement prior to finalising the Publication Draft Sunderland CSDP.

3.3 Previous SA and SEA Reporting

3.3.1 SA and SEA has been undertaken in relation to three previous consultations regarding the emerging Core Strategy:

i. Sunderland Core Strategy SA & SEA Scoping Consultation (March 2016).

3.3.2 This document set out the methodology which underpins the SA of the emerging Sunderland CSDP. The main output was the production of an SA Framework, which comprised a suite of 15 Sustainability Appraisal Objectives (SA Objectives) relevant to the SCC area which may affect (or be affected by) the emerging Sunderland CSDP. These SA Objectives were accompanied by a set of guide questions to inform the assessment of emerging plan components and any identified reasonable alternatives. This SA Framework has subsequently been tweaked in response to feedback from consultees, but it has not been necessary to make any substantive changes that would affect the SA methodology or conclusions.

3.3.3 The latest iteration of the SA Framework is presented in **Appendix C** of the Publication Draft Sunderland CSDP. A summary of the 15 SA Objectives is provided in **Table NTS 3.1** below.

Table NTS 3.1: Sustainability Objectives

1. Biodiversity and Geodiversity: To conserve and enhance biodiversity and geodiversity and promote improvements to the green infrastructure network.
2. Housing: To meet the housing needs of the Sunderland City area.
3. Economy and Employment: To achieve a strong and stable economy which offers rewarding and well located employment opportunities for everyone.
4. Learning and Skills: To improve the educational attainment and skills of Sunderland City's residents.
5. Sustainable Communities: To promote sustainable communities within the Sunderland City area.
6. Health and Wellbeing: To improve the health and wellbeing of those living and working in the Sunderland City area.

7. Transport and Communication: To reduce the need to travel, promote sustainable modes of travel, improve telecommunications infrastructure and align investment in infrastructure with growth.
8. Land Use and Soils: To encourage the efficient use of land and conserve and enhance soils.
9. Water: To conserve and enhance water quality and resources.
10. Flood Risk and Coastal Erosion: To reduce the risk of flooding and coastal erosion to people and property, taking into account the effects of climate change.
11. Air: To improve air quality.
12. Climate Change: To minimise greenhouse gas emissions and adapt to the effects of climate change.
13. Waste and Natural Resources: To promote the movement up the waste hierarchy (reduce, reuse, recycle, recover) and ensure the sustainable use of natural resources.
14. Cultural Heritage: To conserve and enhance the historic environment, cultural heritage, character and setting.
15. Landscape and Townscape: To conserve and enhance landscape character and townscape.

ii. Sunderland Core Strategy Growth Options Consultation (May 2016).

- 3.3.4 This consultative document outlined conceptual growth options (Baseline, Medium Growth and High Growth) and associated spatial strategy variants which could underpin the emerging Sunderland CSDP. The associated SA Report examined the relative sustainability implications of these growth options and spatial strategies. Following this consultation, the High Growth option was selected by SCC to underpin the emerging Sunderland CSDP, although significant changes in the evidence base now mean that a lower quantum of development would be required within the SCC area to implement the option.

iii. Draft Sunderland CSDP Consultation (August – October 2017)

- 3.3.5 The Draft Sunderland CSDP SA Report (2017) identified, assessed and evaluated the likely significant effects of all substantive components of the Draft Sunderland CSDP. No significant adverse effects were predicted to arise, but the SA Report still identified a number of weaknesses within the emerging plan and therefore proposed a suite of mitigation and enhancement recommendations to address identified uncertainties and improve its sustainability performance. These recommendations were considered by SCC through the subsequent preparation of the Publication Draft Sunderland CSDP.
- 3.3.6 All representations received in respect of the Sunderland Core Strategy Growth Options and the Draft Sunderland CSDP, as well as in respect of the associated SA reports, have been reviewed by SCC and taken account of in the preparation of the Publication Draft Sunderland CSDP and the associated SA Report.

3.4 Preparation of the Publication Draft Sunderland CSDP SA Report

- 3.4.1 PBA commenced work on the SA of the Publication Draft Sunderland CSDP in March 2018. The approach has generally followed the approach set out within the Sunderland Core Strategy SA & SEA Scoping Report (March 2016). However, as detailed within **Section 3** and **Appendix E** of the Publication Draft Sunderland CSDP SA Report, a suite of additional assessment criteria had to be devised and applied to undertake a proportionate SA (incorporating SEA) of all proposed strategic site allocations and reasonable alternatives.

3.4.2 All components of the Publication Draft Sunderland CSDP were appraised using matrices to identify likely significant effects on the SA Objectives. A qualitative scoring system has been adopted which is set out in **Table NTS 3.2** below.

Table NTS 3.2: SA Scoring System

Score	Description	Symbol
Significant Positive Effect	The proposed option/policy contributes significantly to the achievement of the objective.	++
Minor Positive Effect	The proposed option/policy contributes to the achievement of the objective but not significantly.	+
Neutral	The proposed option/policy does not have any effect on the achievement of the objective.	0
Minor Negative Effect	The proposed option/policy detracts from the achievement of the objective but not significantly.	-
Significant Negative Effect	The proposed option/policy detracts significantly from the achievement of the objective.	--
No Relationship	There is no clear relationship between the proposed option/policy and the achievement of the objective or the relationship is negligible.	~
Uncertain	The proposed option/policy has an uncertain relationship to the objective or the relationship is dependent on the way in which the aspect is managed. In addition, insufficient information may be available to enable an appraisal to be made.	?

3.4.3 A core SA and SEA requirement is to identify likely significant effects of implementing both a plan (i.e. the emerging Sunderland CSDP) and reasonable alternatives to it, as well as explaining rationale for the identification of any such reasonable alternatives. To be considered as reasonable alternatives, options (e.g. alternative policy criteria or site allocations) must relate to the plan's own objectives and geographical scope.

3.4.4 For this SA of the Publication Draft Sunderland CSDP, the following reasonable alternatives were identified and subject to SA:

- Alternative policy criteria/tests considered during the preparation of the Publication Draft Sunderland CSDP, e.g. application of a higher or lower affordable housing provision requirement;
- Alternative Urban Strategic Scale Sites – the justifications for allocating the South Sunderland Growth Area (SSGA) and Vaux Site were examined to determine whether any reasonable alternatives exist;
- Alternative Green Belt Housing Growth Areas – all candidate Green Belt Housing Growth Areas which reached Stage 2 of SCC's Green Belt Review were assessed;
- Alternative Key and Primary Employment Areas – all sites examined within the Sunderland Employment Land Review 2016 as forming part of the existing employment land supply were assessed; and,
- Alternative Gypsy, Traveller and Travelling Showpeople Sites (TSGT) – all sites which were identified by SCC officers as being potentially suitable and not discounted due to viability constraints were assessed.

3.5 How has the SA Process informed the Publication Draft Sunderland CSDP?

3.5.1 The SA process has informed the content of the Publication Draft Sunderland CSDP through:

- The identification of SA mitigation and enhancement recommendations in respect of the Draft Sunderland CSDP (2017), which have been considered by SCC officers in the preparation of the Publication Draft Sunderland CSDP. **Section 4.2** of the main SA Report explains how each SA recommendation has been taken account of; and,
- Independently reviewing the emerging content of the draft version of the Publication Draft Sunderland CSDP to identify any ambiguities or other weaknesses, and to propose appropriate SA mitigation and enhancement recommendations to resolve such issues. A schedule of proposed mitigation and enhancement recommendations was issued by PBA to SCC in early May 2018, following which the majority of recommended changes were incorporated into the final Publication Draft Sunderland CSDP; and,
- The identification of appropriate policy level mitigation (i.e. relevant subject policies within the Publication Draft Sunderland CSDP itself) to avoid significant adverse effects occurring from proposed site allocations.

3.5.2 Through identifying weaknesses within the emerging Sunderland CSDP and recommending associated changes, the SA process has closely influenced the content of the Publication Draft Sunderland CSDP. As a result, the document is now considered to be more robust and effective in terms of addressing relevant environmental issues.

4 Sustainability Appraisal of the Draft Sunderland CSDP

4.1 Overview

- 4.1.1 SA has been undertaken for all components of the Publication Draft Sunderland CSDP, namely:
- Vision and Strategic Priorities;
 - Proposed Strategic Site Allocations; and,
 - Proposed Policies (including proposed strategic and subject policies).
- 4.1.2 **Section 5** of the main SA report sets out the main findings of the SA which has been carried out. Detailed appraisal matrices are instead contained in appendices D – F of the SA report due to their length. The subsections below provide an overview of key findings from the SA of each Publication Draft Sunderland CSDP component.

4.2 SA of the Publication Draft Sunderland CSDP Vision and Strategic Priorities

- 4.2.1 This section considers the sustainability implications of the Publication Draft Sunderland CSDP Vision and Strategic Priorities. These seek to provide an overarching strategic framework upon which the plan's strategic policies (including Policy SP1 – Spatial Strategy), strategic site allocations and development management policies are based.

Vision

- 4.2.2 The Vision set out within the Publication Draft Sunderland CSDP is considered to set out a strategy for development that is compatible with achieving sustainable development. Should the aspirational vision be successfully implemented through a well worded set of policies it would therefore have the potential to have significant beneficial sustainability effects against all of the sustainability objectives. These relate to:
- **Housing:** by delivering new homes of range of types and tenures to meet the projected population increase in the City area;
 - **Economy and Employment:** a substantial focus of the vision relates to support for the economy including through the through delivery of the International Advanced Manufacturing Park, as well as through smaller scale diverse job opportunities;
 - **Education and Learning:** The support to the University and College will help support and potentially achieve significant beneficial effects where followed up through policy. However, it will be equally important to ensure that there are good quality schools for all children, which can be easily accessed from where people live;
 - **Sustainable communities:** by supporting development of new housing with district and local centres, there is the potential to have significant beneficial effects against this objective through provision of additional healthcare, education and community facilities;
 - **Health and wellbeing:** the vision sets out clear aspirations for achieving beneficial effects for the wider determinants of health, to include supporting non-car travel, education, job creation, new housing etc. However, more could be added on preventing people

suffering from the adverse effects of pollution, including for noise, air and ground contamination;

- Transport and Communications: the vision articulates the need to support district and local centres and sustainable travel as well as the need to provide access for all;
- Flood Risk & Coastal Erosion: the vision notes the need to reduce flood risk impacts to homes and businesses;
- Air Quality: aspirations for reducing car dependence could have significant benefits for air quality effects; and,
- Climate Change: the vision supports the transition to a low carbon economy and recognises the need to adapt to climate change.

4.2.3 Other potential effects include positive impacts on land and soils through prioritising regeneration, although there is no specific reference to contamination. There are also aspirations for biodiversity protection and enhancement, although meeting housing needs has the potential for some adverse effects, which could also be the case for impacts on cultural heritage and landscape objectives.

4.2.4 The high level of growth which the vision seeks to deliver could generate potential adverse impacts on waste and natural resources, although new homes and development may be more resource efficient than existing stock.

Strategic Priorities

4.2.5 The Vision is supported by a set of Strategic Priorities which indicate how the vision will be achieved, including through the implementation of an overarching spatial strategy for the SCC area. As with the Vision, these Strategic Priorities are aspirational and therefore are generally compatible with achieving beneficial sustainability outcomes. The strategic priorities alone cannot implement the Vision or more widely achieve sustainable development, rather they help to define a spatial strategy and overarching framework for implementation measures within the emerging Sunderland CSDP, including site specific allocations and development management policies.

4.2.6 A detailed assessment of the Strategic Priorities against the SA Framework is provided in **Appendix D**. In summary, there is good coverage of all SA Objectives in the proposed Strategic Priorities, with many potential significant beneficial effects identified and no Significant Adverse effects predicted. The Strategic Priorities therefore provide a strong framework to underpin site allocations and development management policies. Notwithstanding this, the assessment undertaken has identified several areas where the Strategic Priorities could be enhanced or clarified, including:

- Water Resources: No Strategic Priority directly addresses issues of water quality, although there may be associated benefits for instance in relation to climate change. There is the potential for this to be addressed in more detail to further promote the potential for beneficial effect; and,
- The need to avoid pollution effects is not picked up very clearly by the Strategic Priorities and this could be improved, both in terms of protecting human health and the ecological receptors;

4.3 SA of Strategic Site Allocations

4.3.1 As detailed in **Section 5.3** and **Appendix E** of the main SA report, the following types of proposed site allocations have been appraised²:

- Housing Growth Areas;
- Key and Primary Employment Areas; and,
- Gypsy Travellers and Travelling Showpeople Sites.

4.3.2 The main findings of the SA undertaken for these proposed strategic site allocations and their reasonable alternatives are summarised below with reference to the 15 sustainability objectives defined within the Sunderland CSDP SA Framework.

Proposed Housing Growth Areas and Reasonable Alternative Sites

4.3.3 Policies SP3 – SP6, SS2 – SS7 and HGA1 – HGA11 within the Publication Draft Sunderland CSDP set out area based strategies and spatial policies, within which 11 Housing Growth Areas (formerly known as proposed Green Belt Housing Release Sites) are proposed for release from the Green Belt and allocation to deliver a total of approximately 1,355 dwellings. As detailed in **Appendix E** of the SA Report and within Green Belt Review reports which support the Publication Draft Sunderland CSDP, SCC has established the need to release these sites from the Green Belt in order to:

- Eliminate a predicted housing land supply shortfall against Sunderland's objectively assessed need (OAN);
- Contribute to meeting SCC's minimum housing target of 765 new dwelling per year over the period to 2033;
- Provide sufficient flexibility within Sunderland's identified deliverable housing land supply to guard against potential non-delivery on individual sites; and,
- Support the delivery of the wider spatial strategy set out within the Publication Draft Sunderland CSDP.

4.3.4 The findings from the SA of all candidate Housing Growth Area allocations, including the 11 proposed allocations, are detailed in **Table 5.2** and considered further in **Appendix E** of the SA report which accompanies the Publication Draft Sunderland CSDP. This includes confirmation of each site's status and mitigation requirements.

4.3.5 The likely environmental and sustainability effects of the allocation of the proposed Housing Growth Areas and reasonable alternative sites are summarised below with reference to each applicable SA Objective from the Sunderland CSDP SA Framework.

SA Objective 1 - Biodiversity and Geodiversity

4.3.6 No likely significant effects on this SA Objective are predicted. However, the candidate sites are predicted to have either Neutral, Minor Positive or Minor Negative effects on this SA Objective owing to their proximity to sites designated for reasons of biodiversity conservation, species importance or geological importance.

² For the reasons detailed in Section 5.3, the proposed urban strategic site allocations were excluded from the SA.

SA Objective 2 - Housing

- 4.3.7 As proposed housing allocations or reasonable alternatives, all candidate sites are considered to have the potential accommodate housing, subject to other constraints. No Negative (Adverse) effects on this SA Objective are therefore predicted. All candidate sites have been assessed as having their Minor Positive or Major Positive (i.e. significant beneficial) effects on this SA Objective, with Significant effects predicted for 14 sites with an estimated capacity of 100+ dwellings.

SA Objective 4 - Learning and skills

- 4.3.8 10 sites are predicted to have Major Positive (i.e. significant beneficial) effects on this SA Objective owing to their immediate proximity to existing school infrastructure. No Major Negative (i.e. significant adverse) effects are predicted, either in relation to proximity to schools or capacity issues. However, a number of Minor Positive, Minor Negative and Neutral effects are predicted from other candidate sites owing to the distance to school infrastructure and/or identified capacity constraints,

SA Objective 5- Sustainable Communities

- 4.3.9 30 candidate sites (i.e. all except Granaries, Offerton CO31 (464B)) are predicted to have some Major Positive (i.e. significant beneficial) effects on this SA Objective owing to their close proximity to amenities and community facilities. However, 5 of these same sites are also predicted to have Major Negative (i.e. significant adverse) effects through their lack of proximity to other specific amenities. Two additional sites that are not predicted to have any Major Positive effects are predicted instead to have a Major Negative (i.e. significant adverse) effect owing to their lack of proximity to convenience stores and allotments respectively. A number of Minor Positive, Minor Negative and Neutral effects are predicted from candidate sites owing to varying distances to specific amenities and community facilities.

SA Objective 6 - Health and Wellbeing

- 4.3.10 30 candidate sites (i.e. all except Granaries, Offerton CO31 (464B)) are predicted to have a Major Positive (i.e. significant beneficial) effect on this SA Objective owing to their proximity to open space, which could facilitate and encourage physical activities as well as enhancing mental health. However, 8 candidate sites are predicted to have a Major Negative (i.e. significant adverse) effect on this site due to the potential loss of designated open spaces, playing fields or well used allotments. A number of Minor Positive, Minor Negative and Neutral effects are predicted from candidate sites owing to varying distances to specific health facilities (including open spaces).

SA Objective 7 - Transport and Communication

- 4.3.11 This SA Objective considers proximity to transport networks and accessibility to key services. 30 candidate sites (i.e. all except Granaries, Offerton CO31 (464B)) are predicted to have a Major Positive (i.e. significant beneficial) effect on this SA Objective owing to their proximity to open space. 13 candidate sites are also predicted to have Major Positive (i.e. significant beneficial) effects due to their close proximity to other amenities, whilst a total of 18 sites are predicted to have a Major Positive (i.e. significant beneficial) effect as they are located within 400m of a bus stop on regular/frequent route or 800m of a train station. 6 candidate sites are however predicted to have a Major Negative (i.e. significant adverse) effect on this SA Objective owing to being located more than 1200m away from a convenience store. A number of Minor Positive, Minor Negative and Neutral effects are predicted from candidate sites owing to varying distances to specific amenities and public transport infrastructure.

SA Objective 8 - Land Use

- 4.3.12 All candidate sites are located within the designated Green Belt. Notwithstanding this, 2 candidate sites are predicted to have Major Positive (i.e. significant beneficial) effects on this SA Objective as they are identified as being brownfield land. 5 candidate sites are predicted to have Major Negative (i.e. significant adverse) effects on this SA Objective as they have site areas exceeding 2 hectares are within agricultural use and include land identified as 'best and most versatile quality'. 1 additional candidate site (East of Seaham Road WA33 (645)) is predicted to have a Major Negative (i.e. significant adverse) effect on this SA Objective due to the site encompassing existing, well used allotments. A number of Minor Negative and Neutral effects are predicted from candidate sites owing to the sites either being less than 2ha and/or not identified as containing best and most versatile quality agricultural land, or because the sites are within areas of known contamination.

SA Objective 9 - Water

- 4.3.13 1 candidate site (West of Cherry Knowle BU4 (674)) is predicted to have a Major Negative (i.e. significant adverse) effect on this objective owing to being located within an inner Groundwater Source Protection Zone (Zone 1). All other candidate sites are predicted to have either Minor Negative or Neutral effects on this SA Objective due to either being within areas of known contamination, areas with no sewage capacity (diversions required) or not being located in these constrained areas.

SA Objective 10 - Flood Risk and Coastal Erosion

- 4.3.14 1 candidate site (Middle Herrington (SW) MD4-5-6 (648B)) is predicted to have a Major Negative (i.e. significant adverse) effect on this objective owing >5% of the site area being within in area affected by 1:30 incidence surface water flooding. All other candidate sites are predicted to have either Minor Negative or Neutral effects on this SA Objective due to either being within less flood prone areas, although this varies between individual sites.

SA Objective 11 – Air Quality

- 4.3.15 As there are currently no Air Quality Management Areas (AQMAs) designated within the SCC area, alternative criteria had to be developed to consider indirect effects on air quality through reliance on transport modes to access key amenities. 18 sites are predicted to have a Major Positive (i.e. significant beneficial) effect on this SA Objective owing to being located within either 400m from a bus stop on regular/frequent route or 800m from a train station. All other sites are predicted to have a Neutral effect given the potential need to use car travel to access key amenities.

SA Objective 14 - Cultural Heritage

- 4.3.16 1 site (Peareth Hall / Trust SP11 (299-300)) is predicted to have a Major Negative (i.e. significant adverse) effect on this SA Objective as it encompasses the Grade II listed Peareth Hall. All other sites are predicted to have Minor Negative or Neutral effects owing to either being located within a conservation area, adjacent to a listed building or Scheduled Monument, covered by a local archaeological area designation, or (for Neutral effects) not being situated within any of these constrained areas.

SA Objective 15 - Landscape and Townscape

- 4.3.17 9 sites are predicted to have Major Negative (i.e. significant adverse) effects on this SA Objective owing to being located within an area identified by SCC as being of higher landscape value and thus for landscape protection. In addition, 9 sites are predicted to have a Major Negative (i.e. significant adverse) effect as they encompass designated open space or playing fields which could be lost to development. 11 sites are predicted to have a Minor Negative effect on this SA Objective as they either include Tree Preservation Orders or lie

adjacent to ancient woodland or other identified key landscape features. All other sites are unaffected by these constraints and are therefore predicted to have a Neutral effect on this SA Objective.

Mitigation Requirements

- 4.3.18 Where the SA has identified a likely significant adverse effect from the allocation of a candidate Housing Growth Area allocation, suitable mitigation needs to be in place to ensure the avoidance of likely significant adverse effects from any development proposals subsequently brought forward on the site. This mitigation takes the form of the application of relevant subject policies within the Sunderland CSDP specifically to avoid likely significant adverse effects from occurring. Relevant subject policies to address this are listed in **Appendix E** of the Publication Draft Sunderland CSDP SA Report.

Proposed Primary and Key Employment Areas (PEAs and KEAs) and Reasonable Alternative Sites

- 4.3.19 The findings from the SA of all candidate Primary and Key Employment Areas (PEAs and KEAs) including proposed allocations and reasonable alternatives are summarised in **Table 5.4** and considered further in **Appendix E** of the SA report which accompanies the Publication Draft Sunderland CSDP. This includes confirmation of each site's status and mitigation requirements. All candidate KEAs and PEAs as well as reasonable alternatives have been identified from the Sunderland ELR 2016, which includes a map of all candidate sites.
- 4.3.20 The SA indicates that if allocated, the candidate KEA and PEA would be likely to have the following significant effects:
- 69 candidate sites are predicted to have Major Negative (i.e. significant adverse) effects on SA Objective 1 owing to their proximity to designated sites. For the avoidance of doubt, this does not mean that employment generating proposals on these sites would necessarily result in significant adverse effects on biodiversity or geodiversity interests, or even that habitats or species surveys would always be required in support of such proposals. Rather, this SA simply identifies that due to the proximity of existing designated sites, the potential for likely significant adverse effects to arise from development proposals on these sites should be taken into account by applicants and decision makers;
 - 17 candidate sites are predicted to have a Major Positive (i.e. significant beneficial) effect on SA Objective 3 owing to their site size (thus potential employment generating development) exceeding 5ha;
 - All 73 candidate sites are predicted to have a Major Positive (i.e. significant beneficial) effect on SA Objective 5 owing to being located within 500m of an identified residential area;
 - 25 candidate sites are predicted to have a Major Positive (i.e. significant beneficial) effect on SA Objective 7 owing to being located within 500m of the strategic transport network. However, 52 candidate sites are predicted to have a Major Negative (i.e. significant adverse) effect on this SA Objective owing to being located within 2km of areas of traffic congestion or capacity constraints, as identified within the adopted 3rd Local Transport Plan (LTP) for Tyne and Wear (2011 – 2021). This SA finding simply means that the potential for significant adverse effects on the transport network to arise from development proposals on these sites should be taken into account by applicants and decision makers;

- 65 candidate sites are predicted to have a Major Positive (i.e. significant beneficial) effect on SA Objective 8 owing to being located on existing industrial land, a brownfield site or previously developed land;
 - 65 candidate sites are predicted to have a Major Negative (i.e. significant adverse) effect on SA Objective 9 owing to being located within 500m of an identified waterbody. As above, this simply means that the potential for such effects to occur from development proposals on these sites should be considered by applicants and decision makers;
 - 14 candidate sites are predicted to have a Major Negative (i.e. significant adverse) effect on SA Objective 10 owing to being located within or immediately adjoining Flood Zone 3. As above, this simply means that the potential for such effects to occur from development proposals on these sites should be considered by applicants and decision makers;
 - 68 candidate sites are predicted to have a Major Positive (i.e. significant beneficial) effect on SA Objective 11 owing to be located at least 2km from a Air Quality Management Area (AQMA), with 5 candidate sites having a Major Negative (i.e. significant adverse) effect due to being located within 500m of an AQMA. As above, this simply means that the potential for such effects to occur from development proposals on these sites should be considered by applicants and decision makers;
 - 48 candidate sites are predicted to have a Major Negative (i.e. significant adverse) effect on SA Objective 14 owing to these sites either encompassing or being located within 500m of a designated cultural heritage site (listed building or Scheduled Monument). As above, this simply means that the potential for such effects to occur from development proposals on these sites should be considered by applicants and decision makers; and,
 - One candidate site (not proposed for allocation) is predicted to have a Major Negative (i.e. significant adverse) effect on SA Objective 15 owing to being located within the existing Green Belt or a Settlement Break as per the existing statutory Development Plan for the SCC area. Any future development proposal on this site would need to be assessed against relevant policies within the Sunderland CSDP to address such effects.
- 4.3.21 There are no predicted significant effects (positive or adverse) from any candidate sites on SA Objective 4.

Mitigation Requirements

- 4.3.22 Where the SA has identified a likely significant adverse effect from the allocation of a candidate PEA or KEA, suitable mitigation needs to be in place to ensure the avoidance of likely significant adverse effects from any development proposals subsequently brought forward on the site. This mitigation takes the form of the application of relevant subject policies within the Sunderland CSDP specifically to avoid likely significant adverse effects from occurring. Relevant subject policies to address this are listed in **Appendix E**.

Travelling Showpeople, Gypsies and Travellers (TSGT) Sites

- 4.3.23 The findings from the SA of all candidate TSGT Sites, including proposed allocations and reasonable alternatives are summarised in **Table 5.5** and detailed in **Appendix E** of the SA report which accompanies the Publication Draft Sunderland CSDP. This includes confirmation of each site's status and mitigation requirements. This SA assessment includes sites which could be developed within the two "*broad locations of growth*" identified in Policy H4 within the Publication Draft Sunderland CSDP.
- 4.3.24 The likely environmental and sustainability effects of the allocation of the proposed TSGT and reasonable alternative sites are summarised below with reference to each applicable Sustainability Objective from the Sunderland CSDP SA Framework.

SA Objective 1 - Biodiversity and Geodiversity

- 4.3.25 No likely significant effects on this SA Objective are predicted. However, the candidate sites have either Neutral, Minor Positive or Minor Negative effects on this SA Objective owing to their proximity to sites designated for reasons of biodiversity conservation, species importance or geological importance.

SA Objective 2 - Housing

- 4.3.26 As proposed TSGT allocations or reasonable alternatives, all candidate sites are considered to have the potential to accommodate TSGT plots, subject to other constraints. No Negative (Adverse) effects on this SA Objective are therefore predicted. All candidate sites except 1 (Land at Lorne St / Elemore Lane) are predicted to have a Significant Positive effect on this SA Objective as their site areas are considered sufficient to accommodate 15+ plots for showpeople or 5+ pitches for gypsy and travellers, both of which would significantly contribute to meeting identified TSGT accommodation needs within the SCC area.

SA Objective 4 - Learning and skills

- 4.3.27 31 sites are predicted to have Significant Positive effects on this SA Objective owing to their immediate proximity to existing school infrastructure. No Major Negative (Significant Adverse) effects are predicted, either in relation to proximity to schools or capacity issues. However, a number of Minor Positive, Minor Negative and Neutral effects are predicted from other candidate sites have been identified owing to the distance to school infrastructure and/or identified capacity constraints,

SA Objective 5- Sustainable Communities

- 4.3.28 35 candidate sites are predicted to have some Significant Positive effects on this SA Objective owing to their close proximity to amenities and community facilities. However, 2 of these same sites are also predicted to have Major Negative (Significant Adverse) effects through their lack of proximity to other specific amenities. 1 additional site that is not predicted to have any Significant Positive effects is predicted instead to have a Significant adverse effect owing to its lack of proximity to specific amenities. A number of Minor Positive, Minor Negative and Neutral effects are predicted from candidate sites owing to varying distances to specific amenities and community facilities.

SA Objective 6 - Health and wellbeing

- 4.3.29 30 candidate sites are predicted to have a Significant Positive effect on this SA Objective owing to their proximity to open space, which could facilitate and encourage physical activities as well as enhancing mental health. No Significant Adverse effects are predicted. A number of Minor Positive, Minor Negative and Neutral effects are predicted from candidate sites owing to varying distances to specific health facilities.

SA Objective 7 - Transport and Communication

- 4.3.30 40 candidate sites are predicted to have a Significant Positive effect on this SA Objective owing to their proximity to being located within 500m of the strategic road network (A1M, A194M, A1231, A19, A690, A1018) or being located within 400m of a bus stop on a regular/frequent route or within 800m of a train station. However, 8 of these sites are predicted to have a Significant Adverse effect on this objective owing to being located greater than 1500m from the strategic road network, although these sites remain within 400m of the public transport network. 2 additional candidate sites which are of note are located within 400m of the public transport network and are predicted to have a Significant Adverse effect owing to being located greater than 1500m away from the strategic road network.

SA Objective 8 - Land Use

- 4.3.31 All 43 candidate sites are predicted to have a Significant Positive effect on this SA Objective owing to being located within 800m walking distance of a designated open space. A number of Minor Positive, Minor Negative and Neutral effects are also predicted from candidate sites owing to the variety of land use characteristics displayed by each site.

SA Objective 9 - Water

- 4.3.32 No Significant effects (positive or adverse) are predicted on this SA Objective. All candidate sites are predicted to have either Minor Negative or Neutral effects on this SA Objective due to either being within an outer Groundwater Source Protection Zone (Zone 2) or Catchment (Zone 3), or not within these constrained areas.

SA Objective 10 - Flood Risk and Coastal Erosion

- 4.3.33 1 candidate site (Land at Lyons Ave, Easington Lane) is predicted to have a Significant Adverse effect on this objective as this site is known to be at a high level of risk of groundwater flooding. All other candidate sites are predicted to have either Minor Negative or Neutral effects on this SA Objective due to either being within less flood prone areas, although this varies between individual sites.

SA Objective 11 – Air Quality

- 4.3.34 All candidate sites are considered to have a Neutral effect on this SA Objective as there are currently no Air Quality Management Areas (AQMAs) designated within the SCC area and proximity to public transport has already been assessed through SA Objective 7. No significant effects are therefore predicted.

SA Objective 14 - Cultural Heritage

- 4.3.35 No significant effects (positive or adverse) are predicted on this SA Objective. All candidate sites are predicted to have Minor Negative or Neutral effects owing to either being located within a conservation area, adjacent to a listed building or Scheduled Monument, covered by a local archaeological area designation, or (for Neutral effects) not being situated within any of these constrained areas.

SA Objective 15 - Landscape and Townscape

- 4.3.36 6 candidate sites are predicted to have Significant Adverse effects on this SA Objective owing to being located within an area identified by SCC as being of higher landscape value and thus for landscape protection. All other candidate sites are unaffected by these constraints and are therefore predicted to have a Neutral effect on this SA Objective.

Mitigation Requirements

- 4.3.37 Where the SA presented in **Table 5.5** identifies a likely significant adverse effect from the allocation of a candidate TSGT site, which is denoted by -- scoring, suitable mitigation needs to be in place to ensure the avoidance of likely significant adverse effects from any development proposals subsequently brought forward on the site. This mitigation takes the form of the application of relevant subject policies within the Sunderland CSDP specifically to avoid likely significant adverse effects from occurring from the development of the site. Relevant subject policies to address this are listed in **Appendix E**.

4.4 SA of Proposed Policies

- 4.4.1 The SA of proposed policies has been undertaken by policy grouping, corresponding with each chapter of policies contained within the Publication Draft Sunderland CSDP. This enabled a proportionate assessment to be undertaken of each policy and of the cumulative effects of each policy grouping, focusing on the sustainability issues most relevant to the policy or policies being assessed.
- 4.4.2 A visual summary of the detailed SA provided in **Appendix F** of the Publication Draft Sunderland CSDP SA Report is shown in **Figure NTS 4.1** below. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA Objectives. The colour coding applied in **Figure NTS 4.1** aligns with the scoring system detailed earlier within **Table NTS 3.2**. Of note, this appraisal takes account of SA mitigation and enhancement recommendations which have already been incorporated into the Publication Draft Sunderland CSDP.
- 4.4.3 **Figure NTS 4.1** allows for easy identification of predicted effects from the proposed policies, which helps to focus the SA on key sustainability issues and predicted significant effects in accordance with core SEA and SA requirements. This indicates that the majority of the proposed policies are predicted to have either Major (i.e. significant) or Minor (i.e. not significant) positive effects on the SA Objectives, and no Major Negative (significant adverse) effects are predicted. Some Minor Negative effects are also predicted to arise from a relatively small number of proposed policies. The reasons for each predicted sustainability effect are detailed within **Appendix F** of the Publication Draft Sunderland CSDP SA Report.

Figure NTS 4.1: Sustainability Appraisal of Proposed Policies – Visual Summary

Policy Group	Policy / SA Objectives	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14	SA15
Spatial and Area Strategies ³	SP1	+	++	+	~	++	+	++	++	+	+	+	++	~	+	+
	SP2	~	++	++	++	++	+	++	++	~	~	+	++	~	++	++
	SS5	~	++	++	-	-	-	++	~	~	~	~	~	~	~	~
Healthy and Safe Communities	SP7	+	++	++	+	++	++	+	~	+	~	++	+	~	+	+
	HS1	+	~	~	~	~	++	~	~	++	~	++	+	~	+	+
	HS2	+	~	~	~	~	++	~	~	+	~	~	~	~	~	~
	HS3	+	~	~	~	~	++	~	++	+	~	~	~	~	~	~
Housing	HS4	+	~	~	~	~	++	~	~	+	~	~	~	~	~	~
	SP8	-	+	++	~	~	~	~	-	-	-	~	~	~	-	-
	H1	~	++	++	~	~	++	++	++	~	~	~	+	~	+	++
	H2	~	++	++	~	+	~	~	~	~	~	~	~	~	~	~
	H3	~	++	++	+	++	++	++	~	~	~	~	+	~	~	~
	H4	~	++	++	+	++	++	++	~	+	~	~	+	~	~	~
	H5	~	++	++	~	~	+	~	~	~	~	~	~	~	~	~
Economic Growth	H6	~	++	++	~	~	~	~	~	~	~	~	~	+	~	~
	H7	+	++	++	~	~	~	~	~	~	~	~	~	~	+	++
	EG1	~	-	++	+	~	~	++	~	~	~	+	+	~	~	~
	EG2	~	-	++	+	~	~	++	~	~	~	+	+	~	~	~
	EG3	~	-	++	+	~	~	++	+	~	~	+	+	~	~	~
	EG4	~	-	++	+	~	~	++	+	~	~	+	+	~	~	~
Vitality of Centres	EG5	~	-	++	+	~	~	++	+	~	~	+	+	~	~	~
	EG6	~	~	++	+	~	~	++	~	~	~	+	+	~	~	~
	VC1	~	-	++	+	+	+	++	+	~	~	+	+	~	++	~
	SP9	~	~	++	~	~	~	~	~	~	~	~	+	~	~	~
	VC2	~	~	++	~	~	~	++	~	~	~	~	+	~	~	~
	VC3	~	~	++	~	~	~	++	~	~	~	~	+	~	~	~
Built and Historic Environment	VC4	~	~	+	~	~	-	+	+	~	~	+	~	~	~	+
	VC5	~	~	++	++	++	++	~	+	~	~	~	+	~	++	~
	VC6	~	~	++	++	++	++	++	+	~	~	~	+	~	++	~
	BH1	++	+	++	~	++	++	+	+	~	++	++	+	~	+	++
	BH2	++	~	~	~	~	~	~	~	++	~	~	+	++	~	~
	BH3	~	~	~	~	++	++	+	~	~	++	~	+	+	~	++
	BH4	~	~	~	~	~	~	~	+	~	~	~	~	~	~	++
	BH5	~	~	~	~	~	~	~	~	~	~	~	~	~	++	++
Natural Environment	BH6	~	~	~	~	~	~	~	++	~	~	~	~	~	++	+
	BH7	~	~	+	~	~	~	~	++	~	~	~	~	~	++	+
	BH8	~	~	-	~	~	~	~	++	~	~	~	~	~	++	+
	BH9	~	~	-	~	~	~	~	++	~	~	~	~	~	++	+
	NE1	++	~	+	~	++	+	++	+	++	+	+	++	~	+	+
	NE2	++	~	+	~	~	+	~	++	++	~	~	+	~	~	+
	NE3	++	~	+	~	~	+	~	+	+	~	~	+	~	~	+
	NE4	++	~	+	~	++	++	+	+	+	+	+	++	~	+	+
	NE5	~	~	~	~	~	+	++	+	+	+	~	+	~	~	+
	NE6	+	-	-	~	~	+	+	++	~	~	~	~	~	~	++
	NE7	+	-	-	~	~	+	+	++	~	~	~	~	~	~	++
	Water, Waste and Energy	NE8	+	+	++	~	++	+	~	+	~	~	+	~	~	~
NE9		+	~	+	~	~	+	~	+	~	~	+	~	~	++	++
NE10		++	+	++	+	+	++	+	++	++	+	+	+	+	++	++
NE11		+	~	+	~	~	+	~	+	~	~	+	~	~	++	++
NE12		+	-	+	~	~	+	~	+	~	~	~	~	~	+	+
WWE1		++	~	++	~	~	+	+	+	++	++	++	++	~	++	++
WWE2		++	~	-	~	~	+	~	+	++	++	~	+	~	~	~
WWE3		++	~	-	~	~	+	~	+	++	++	~	+	~	~	~
WWE4		++	~	~	~	~	+	~	+	++	++	~	~	~	~	~
WWE5		+	~	~	~	~	+	~	+	+	+	~	~	~	~	~
Sustainable Transport	WWE6	++	~	~	~	+	0	~	+	++	++	++	+	++	++	++
	WWE7	~	~	~	~	+	~	+	+	++	++	++	+	~	++	~
	WWE8	~	~	~	~	+	~	~	~	~	~	~	~	++	~	~
Minerals	WWE9	++	~	~	~	+	0	~	+	++	++	++	+	~	++	++
	WWE10	++	~	++	~	~	+	+	+	++	++	++	++	~	++	++
	SP10	-	+	++	+	++	++	++	~	~	-	++	++	~	-	~
	ST1	~	~	++	~	++	++	++	~	~	~	++	++	~	~	+
Implementation and Delivery	ST2	~	~	++	~	++	+	++	~	~	~	++	++	~	~	~
	ST3	~	~	~	~	~	~	++	~	~	~	++	++	~	~	~
Implementation and Delivery	SP11	~	+	~	~	+	~	~	~	++	++	++	~	+	++	++
	M1	~	+	~	~	-	0	~	++	~	~	~	~	+	~	~
	M2	~	+	+	~	+	0	~	~	++	++	++	+	~	++	++
	M3	~	+	~	~	~	~	~	++	~	~	~	~	~	~	~
Implementation and Delivery	M4	~	+	~	~	~	~	~	++	+	+	~	~	~	~	~
	ID1	~	~	~	~	~	~	~	~	~	~	~	~	~	~	~
Implementation and Delivery	ID2	~	+	~	+	+	+	+	~	~	~	+	+	~	~	+

³ Only three of the spatial and area based policies within the Publication Draft Sunderland CSDP have been subject to detailed assessed, as the other policies within the document have either been scoped out from further consideration or relate to the allocation of Housing Growth Area allocations, which have been assessed separately.

Cumulative and Synergistic Effects from Proposed Policies

4.4.4 As detailed in **Appendix F – SA of Proposed Policies**, the proposed policies are predicted to have a range of significant cumulative and/or synergistic effects in relation to multiple SA Objectives. In summary:

- Policy SP1 interacts with all land use allocations within the Core Strategy, as well as policies relating to the distribution of new housing and employment developments, as it directs development to the most sustainable locations and identifies areas where growth should be focused. As such, this policy acting in combination with subject specific policies regarding accessibility, infrastructure provision and environmental or amenity protection would result in Major Positive (i.e. significant beneficial) cumulative effects on SA Objectives 2, 3, 5, 7 and 8;
- All of the proposed Healthy and Safe Communities policies reinforce each other and would interact with relevant environmental quality, greenspace and amenity protection policies, as well as policy SP1 in relation to implementing a spatial strategy to achieve sustainable development. These policies would therefore have Minor Positive cumulative effects on SA Objectives 1, 6 and 11;
- Acting together, all of the proposed Housing policies would have a Major Positive synergistic effect on SA Objectives 2 and 3 as they would support the provision of well-designed housing in appropriate and accessible locations to meet identified housing (and thus labour supply) needs. However, the spatial distribution of new housing and employment development would influence the success of these synergistic effects;
- The proposed Economic Growth policies all seek to meet identified employment needs to stimulate economic growth in appropriate locations, which would directly contribute to the implementation of sustainable development and the Core Strategy's spatial strategy. As such these policies would have Major Positive (i.e. significant beneficial) cumulative effects in combination with each other on SA Objective 3;
- The proposed Vitality of Centre policies seek to concentrate main town centre uses within the highly accessible hierarchy of identified centres and to protect the vitality of such centres. This would contribute to the implementation of the spatial strategies set out in policies SP1 and SP3. These policies, acting together and in combination with transport, employment and environmental policies, would result in positive cumulative accessibility, employment and climate change mitigation effects. As such these policies would have Major Positive (i.e. significant beneficial) cumulative effects on SA Objectives 3, 5, 7, 8 and 12;
- By meeting cultural, leisure and tourism development needs in appropriate and accessible locations and by directing high footfall development proposals to the identified hierarchy of centres, proposed policy VC6 – Culture, Leisure and Tourism would help to implement sustainable development, provide facilities to meet population needs and support the vitality and vibrancy of the identified centres. This would result in Minor Positive cumulative effects in combination with policies SP1 and SP3 on SA Objectives 3 and 5;
- Through requiring development proposals to achieve high design and placemaking standards and by protecting designated heritage assets (including their setting), the proposed Built and Historic Environment policies would ensure that development proposals are appropriately sited, designed and integrated with their surroundings. Acting together, these policies would have Major Positive cumulative effects on the quality of the built environment and the creation of sustainable, attractive places. In doing so the policies would help to implement sustainable development and have Major Positive (i.e. significant beneficial) cumulative effects on SA Objectives 5, 8, 9, 14 and 15;

- The proposed Healthy and Safe Communities and Natural Environment policies set out criteria to protect and enhance environmental quality and to avoid unacceptable adverse health and amenity impacts. Acting together, these policies would reinforce each other and have Major Positive cumulative effects on the overall quality of built and natural environments and local amenity. In doing so the policies would help to implement sustainable development and have Major Positive (i.e. significant beneficial) cumulative effects on SA Objectives 1, 8, 9, 11, 12 and 15;
- Policies SP15, SP16, ST1, ST2 and ST3 would help to meet identified connectivity needs, concentrate and unlock new development in accessible locations, encourage sustainable modal shifts and increase access to key facilities and employment opportunities. As such these policies would have Major Positive (i.e. significant beneficial) cumulative effects in combination with the housing, economic growth, vitality of centres and spatial strategy policies on SA Objectives 2, 3, 5, 6, 7, 11 and 12;
- The proposed Water, Waste and Energy (WWE) and Minerals policies set out criteria to ensure sufficient availability/capacity of mineral resources and waste management processing facilities to meet identified needs, whilst minimising land use conflicts and avoiding significant adverse environmental or amenity impacts. As such the policies would individually and cumulative contribute to sustainable development and would have Major Positive (i.e. significant beneficial) effects on SA Objectives 1, 3, 6, 8, 9, 11, 12, 13 and 15; and,
- The proposed Implementation and Delivery policies set out mechanisms to ensure that development proposals provide adequate infrastructure to make the proposal acceptable in planning terms and are implemented in accordance with valid planning permissions. but they do not set out policy tests. The policies would therefore be limited to playing a supporting role in implementing other subject specific policies in pursuit of sustainable development and are not predicted to have any individual or cumulative significant effects.

5 Further Mitigation and Enhancement Recommendations

5.1 Overview

- 5.1.1 The Publication Draft Sunderland CSDP was initially assessed on a pre-mitigation basis following which a suite of mitigation and enhancement recommendations were devised by the SA project team to address uncertainties and strengthen the alignment of the plan with the Sunderland CSDP SA Framework. These recommendations were addressed by SCC officers and relevant components of the Publication Draft Sunderland CSDP were then re-assessed, with the updated assessment findings summarised in **Section 5** of this NTS.
- 5.1.2 As a result, the final version of the Publication Draft Sunderland CSDP is not predicted to result in any likely significant adverse effects not capable of being addressed through the plan itself, i.e. through the application of relevant subject policies in the determination of planning applications.
- 5.1.3 No further mitigation measures therefore still require to be incorporated into the Publication Draft Sunderland CSDP specifically to avoid the document from having unaddressed likely significant adverse effects, whilst measures have also now been incorporated to enhance the sustainability performance of the document. Consideration is given below to any further measures which could be adopted to improve the clarity, and therefore implementation, of the Publication Draft Sunderland CSDP.

5.2 Further Enhancement Recommendations – Proposed Policies

- 5.2.1 The only identified further enhancement recommendations which could be adopted relate to the coverage of economic activities and employment generating development within Policy SP1 – Spatial Strategy:
- To enhance this policy’s contribution to SA Objective 3 and allow the policy to act as a more overarching spatial strategy, it could be expanded to direct employment generating development to particular locations, in the same high-level way as the policy does for housing growth. However, other policies within the Publication Draft Sunderland CSDP already set out where employment generating development should be directed to, so the absence of this from Policy SP1 would not affect the implementation of the plan when read and applied as a whole; and,
 - For clarity, a cross-reference could be added to the policy’s supporting text to signpost readers to the Economic Growth chapter, which identifies the “key growth sectors” that Policy SP1 provides support for.

5.3 Further Mitigation and Enhancement Recommendations – Proposed Sites

- 5.3.1 As summarised in **Section 4.3** of this NTS, the SA has identified the potential for the inclusion of some proposed strategic site allocations within the Publication Draft Sunderland CSDP to have likely significant adverse effects. To address this, **Appendix E** of the Publication Draft Sunderland CSDP identifies relevant subject policies which should be engaged in the determination of planning applications on allocated sites specifically to avoid likely significant adverse effects from occurring. This approach to embedded policy level mitigation could be strengthened further by identifying within each allocating spatial policy the relevant subject policies or technical assessment requirements which should be applicable specifically to ensure the avoidance of the likely significant adverse effects when determining planning applications on that allocated site.

6 Summary and Next Steps

6.1 Summary

6.1.1 A full SA report and this associated NTS have been prepared to accompany the Sunderland Publication Draft CSDP. This NTS has

- Provided an overview of the Publication Draft Sunderland CSDP;
- Outlined the purpose and legal requirements of undertaking a SA, incorporating SEA, of the emerging Sunderland CSDP:
- Summarised the approach to undertaking and the key findings of the SA of the Publication Draft Sunderland CSDP; and,
- Proposed mitigation and enhancement measures to improve the effectiveness and environmental performance of the emerging Sunderland CSDP.

6.2 Next Stages of Sunderland CSDP Preparation

6.2.1 This SA Report will be consulted on in tandem with the Publication Draft Sunderland CSDP. All representation received regarding both documents will then be analysed by SCC to determine whether:

- Substantive modifications need to be made to the Publication Draft Sunderland CSDP, resulting in the need to re-consult on a Revised Publication Draft Sunderland CSDP and an associated SA Report; or,
- Non-substantive modifications need to be made to the Publication Draft Sunderland CSDP, following which it would be submitted to the Secretary of State to undergo a formal Examination in Public (EiP) by an appointed Inspector.

6.2.2 The formal EiP will then consider the soundness of the Sunderland CSDP and all unresolved issues raised in representations regarding the Publication Draft Sunderland CSDP. The SA Report and this NTS will be a key document to inform the EiP and will be submitted to the Secretary of State in support of the Publication Draft Sunderland CSDP. Following the examination, the appointed Inspector will identify any modifications necessary before the Sunderland CSDP can be adopted by SCC. Any such modifications will undergo SEA screening and a further round of consultation, although they are largely binding upon SCC.

6.2.3 Once the modifications identified through the EiP have been incorporated into the Sunderland CSDP, the final document will be presented to a full meeting of SCC for formal adoption as part of the new statutory Development Plan for the SCC area. At this time, a SA Post Adoption Statement will be prepared to explain how the SA process, incorporating SEA, has informed the development of the Sunderland CSDP.

6.3 Monitoring

6.3.1 To comply with the statutory requirements, SCC is developing a full Implementation and Monitoring Framework for the Sunderland CSDP. This will be used as the main tool to monitor and review the implementation of the plan and the associated environmental effects. It will also identify and monitor the actions required by multiple stakeholders to deliver key elements of the plan, including but not limited to the delivery of development on strategic site allocations.

- 6.3.2 For a successful monitoring framework, SCC must ensure that the indicators they choose for monitoring are specific, manageable and targeted towards measuring the implementation of the Sunderland CSDP. It is therefore recommended that the Sunderland CSDP Monitoring Framework should be based around the 15 sustainability objectives and the associated indicators and targets detailed within the Sunderland CSDP SA Framework.
- 6.3.3 The Sunderland CSDP Implementation and Monitoring Framework will need to include mechanisms to monitor the likely significant effects on the environment of the Publication Draft Sunderland CSDP as predicted within the associated SA Report and summarised within this NTS. This would include mechanisms to monitor whether the likely significant adverse effects identified from the proposed allocation of strategic sites are subsequently properly addressed through:
- The application of relevant subject policies in the Council's decision making;
 - The provision of relevant technical assessments in support of development proposals on allocated sites; and,
 - Where necessary, the implementation of appropriate physical mitigation by applicants seeking to develop these sites.
- 6.3.4 In addition, the Implementation and Monitoring Framework should include mechanisms to assess whether all development management policies are being implemented as intended and with no unforeseen adverse consequences. To inform future reviews of the statutory Development Plan for the SCC area it would also be prudent to monitor whether the policies remain in conformity with any updates to national planning policy.

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