

Sunderland Strategic Housing Land Availability Assessment Methodology

Final

Version 1



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1. Introduction

This SHLAA methodology has been finalised following consultation on a draft methodology between 19 October 2016 and 2 November 2016. A schedule of responses to the draft methodology consultation can be found in Appendix A.

What is a Strategic Housing Land Availability Assessment?

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to prepare and update a Strategic Housing Land Availability Assessment (SHLAA).

A SHLAA identifies a future supply of land for housing which is suitable, available and achievable. The assessment forms a key component of the evidence base to underpin policies for housing in the emerging Sunderland Local Plan. A SHLAA is not a policy document. Whilst the Sunderland SHLAA identifies land, it will not determine whether a site should be allocated as part of the Local Plan or be granted planning permission. It simply provides comprehensive information on potential sources of housing land which, alongside other information, will be used to inform future plan making decisions including future housing allocations.

The assessment will:

- Identify sites or broad locations with potential for housing;
- Assess their development potential; and
- Assess their suitability for development and likelihood of development coming forward in the future (a sites availability and achievability)¹

The SHLAA will identify:

- A supply of specific, deliverable sites for the first five years of a plan;
- A supply of specific developable sites for years 6-10; and where possible 11-15 years.

What is the purpose of this document?

This documents sets out the approach and methodology used by Sunderland City Council in the preparation of its 2016 SHLAA which will be used to inform the emerging Sunderland Local Plan.

The Council has published this document as a technical consultation to allow interested parties to review the approaches and assumptions detailed in the methodology and ensure that the SHLAA is compliant with National Planning Policy Guidance and is capable of providing a robust evidence base for plan making. It is important the SHLAA methodology is fit for purpose, providing a comprehensive housing land supply evidence base to inform plan making.

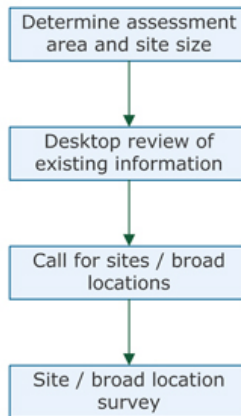
¹ Planning Practice Guidance, DCLG, ID 3-001-21040306

2. Methodology

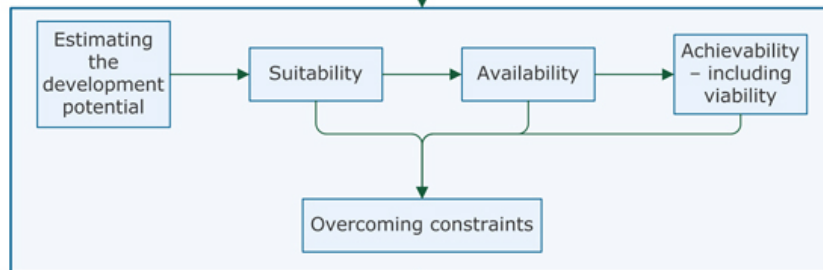
The Sunderland SHLAA Methodology is consistent with National Planning Practice Guidance for housing and economic land availability assessments. Figure 1 details the inputs and processes which should be included and undertaken to produce a robust SHLAA assessment. This methodology will set out how each stage of the assessment will be achieved.

Figure 1: Methodology Flow Chart²

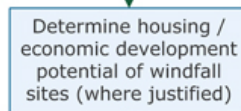
Stage 1 - Site / broad location identification



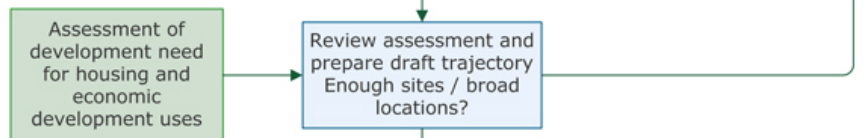
Stage 2 - Site / broad location assessment



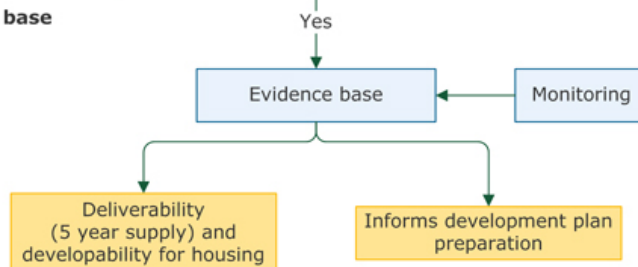
Stage 3 - Windfall assessment



Stage 4 - Assessment review



Stage 5 - Final evidence base



² Planning Practice Guidance, DCLG, ID 3-006-20140306

National Planning Practice Guidance advocates a partnership approach, involving key partners and stakeholders in the SHLAA process. The Council recognises the importance of working in partnership with others and will establish a renewed Sunderland SHLAA Partnership which will comprise of a number of stakeholders who possess key skills and knowledge of housing and housing delivery. Members will be invited from the following representative groups where appropriate:

- developers
- those with land interests
- land promoters
- local property agents
- local communities
- partner organisations; and
- neighbourhood planning groups (where appropriate)

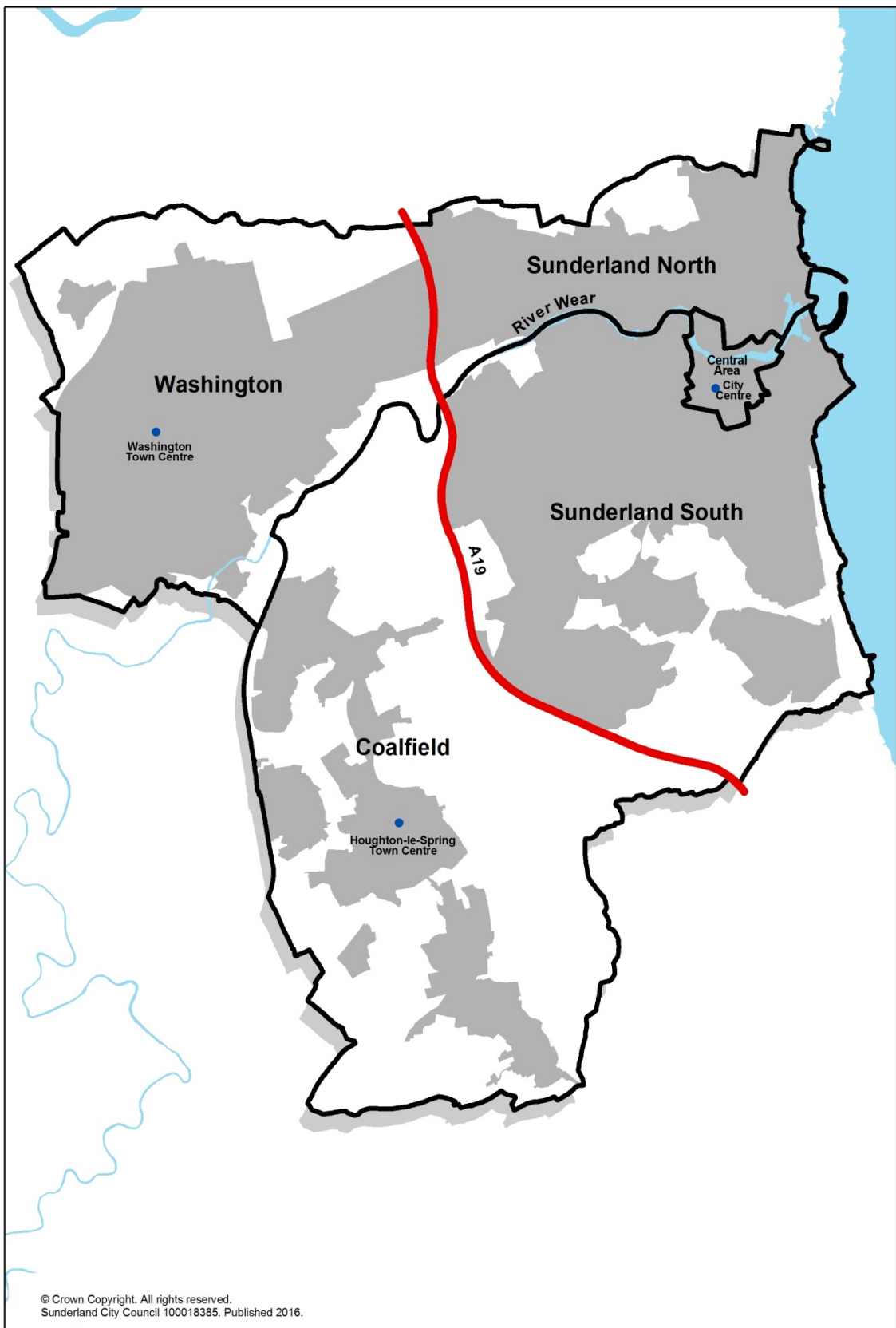
A small sub-group of the SHLAA partnership will be selected based upon their expertise in housing delivery, to compose the SHLAA Site Assessment Panel. The assessment panel will oversee the Stage 2 site assessment stage.

Stage 1: Site/Broad Location Identification

Determine Assessment Area

The Sunderland SHLAA covers the geographical area within Sunderland City Council's administrative boundary. The area will be subdivided into localised sub areas; South Sunderland, North Sunderland, Central Sunderland, Washington and Coalfields (Figure 2).

Figure 2: Sunderland's administrative boundary



Site Size

National guidance makes provision for the assessment of a range of different site sizes, from small scale opportunities to large scale developments such as village and town extensions and new settlements, where appropriate³. Guidance advocates the consideration of all sites or broad locations capable of delivering five or more dwellings and provides plan makers with the option of applying difference site size thresholds, where appropriately justified.

The Sunderland SHLAA will seek to identify all sites with potential to accommodate 5 dwelling units or more. The assessment will be used as an evidence base for the identification of sites in locations suitable for the level of development required by the Sunderland Local Plan. The SHLAA will not be constrained by the need for development.

Desktop Review of Existing Information

The Stage 1 desktop review provides a baseline position and the starting point for sites to be considered as part of the SHLAA. The Sunderland SHLAA will proactively identify sites from as wide a range of sources as possible. Regard will be had to the potential sources of sites set out in both the National Planning Practice Guidance and the Regional Implementation Guide (2008). The following types of sites may be particularly relevant sources for assessment in the SHLAA:

Table 1: Types of sites with potential for housing and data sources⁴

Type of site	Data sources
<p>Planning Applications Planning applications will be reviewed annually and information collated into the Sunderland SHLAA database. Where necessary the council will contact developers/landowners to ascertain delivery plans to ensure housing delivery forecasts are accurate</p>	<p>Planning applications records (outline/full planning permissions) Pending applications (including awaiting S106 agreements) Expired and withdrawn applications Development starts and completions records Pre-App process/discussions</p>
<p>SHLAA Sites Sites including the previous call out for sites will be reviewed to ensure the site assessment are up to date and accurate.</p>	<p>SHLAA 2013</p>
<p>Brownfield and vacant/derelict land and buildings Brownfield land which is currently considered to be under utilised is a further source of potential development sites. Derelict and vacant sites will be identified through a site search process carried out by planning officers using a variety of methods including desktop survey, local knowledge and suggestions from residents through consultation exercises.</p>	<p>Local authority records Local planning authority Empty Property Register Brownfield Sites Register</p>
<p>Existing/Allocated sites Since the publication of the Unitary Development Plan (1998) a number of</p>	<p>Information and progress of sites monitored against planning applications and completions and commencements data. Additional</p>

³ Planning Practice Guidance, DCLG, ID 3-010-20140306

⁴ Planning Practice Guidance, DCLG, ID 3-012-20140306

undeveloped allocations will be assessed to ascertain their current suitability and deliverability for housing. Sites identified within masterplans, development briefs and area action plans will also be identified and assessed.	information will be sourced from planning officers (Development Management, Implementation and Policy).
Local Authority land surplus to requirements Sites which are surplus to the Council's requirements will be assessed for their housing potential.	Local authority records Council's Capital Programme
Housing sites put forward during a "call for sites" consultation and throughout the local plan process to date Sites submitted to the Council for assessment in the SHLAA which have not already been identified through other site types above, will be assessed.	Any sites/broad locations submitted directly to the council for consideration through periods of consultation and/or submitted independently e.g. from landowners, agents, RSLs and developers etc.
Internal site suggestions from Council Officers e.g. Planning, Housing, Economic, Leisure, Education etc.	Development Briefs Technical Assessments Council Disposal Strategies

The SHLAA provides an assessment of a site at a specific point in time, based upon best information available to a planning officer in order to make the assessment. A site's position can inevitably change between SHLAA publications, for example as a result of grant of planning permission for housing on a site. In such instances changes to a site's status will be updated in the next annual SHLAA update. However if data is factually inaccurate the Council welcomes early engagement and accepts comments regarding inaccuracies at the earliest opportunity.

Call out for sites/broad locations

National Planning Practice Guidance indicates that plan makers should issue a call for sites, which should be aimed at as wide an audience as practicable. The last call for sites was undertaken in 2014. Further sites have been submitted to the Council as part of Local Plan consultations. All sites have been and will continue to be included and assessed in annual updates of the SHLAA to provide an accurate and current housing land supply position.

Future calls for sites will be made when a need for additional land is required. Details of sites which are submitted for consideration by the Council outside of an official call for sites will be retained and assessed when the SHLAA is next reviewed.

In order to assess a site, as a minimum, the following information will be required to be submitted via completion of a site proforma (Appendix A):

- Details of the location and size of the site including an appropriately scaled site location plan;
- The current and proposed use of the site;
- Details of any ownership, legal or financial constraints;
- Details of infrastructure or other physical constraints;
- The scale of development proposed; and
- The timescale for bringing development forward.

Desktop survey of sites

All sites assessed in the Sunderland SHLAA will be mapped using ArcGIS and assessments will be recorded in the Sunderland SHLAA database.

In accordance with NPPG, the following information will be recorded at the survey stage:

- Site size, boundaries, and location;
- Current use(s) and character;
- Character of surrounding area and the surrounding land use(s);
- Physical and potential environments constraints e.g. access, steep slopes, potential for flooding, natural features of significance and location of pylons; and
- Potential environmental constraints;
- An initial assessment of whether the site is suitable for housing or housing as part of a mixed use development.
- Where relevant, development progress;
- Suitability of residential use; and viability.

A desk top survey will be undertaken in which sites are assessed against national policies and designations to establish which have reasonable potential for development. NPPG advises that particular types of land or areas of designation may be excluded from a SHLAA where justified. The following categories of site, known as Category 1 sites, are deemed to have no housing potential and will be sieved out.

Table 2: Category 1 Designations

Sites of Special Scientific Interest
Ramsar sites
Special Protection Areas (SPAs)
Special Areas of Conservation (SACs)
National Nature Reserves
Scheduled Ancient Monuments
Health and Safety Executive Inner Zones
Areas identified as flood zone 3b

Category 1 sites will not be subject to a site survey but will be retained in the SHLAA database for completeness. In circumstances where a small area of a site is identified by one of the above designations, the remainder of the site will be subject to an assessment where it can be demonstrated that mitigation of the impact of development on the category 1 designation can be achieved.

Other policy designations will be identified during the desk top survey. Sites located within these designated areas are known as Category 2 sites. While these designations may affect the scale and type of development, they are not considered as a reason to discount a site from the assessment at this stage, but will be considered as part of the stage 2 - site assessment.

Site survey of sites

The desktop study will be supplemented by site visits undertaken by Planning Officers. The aim of the site survey is to help to ratify information gathered through the call for sites and desk assessment, gain a better understanding of what type and scale of development may be appropriate and gain a more detailed understanding of any barriers to development and how they may be overcome (e.g. topography, access and physical site constraints).

Site surveys will be proportionate to the level of detail required. As detailed above Category 1 sites will not be surveyed. Other sites that are proposed to be sieved out from the survey are greenfield sites in the countryside and SCC owned sites without a resolution to dispose.

By virtue of national and local policies prioritising development within and adjacent to settlements, it is considered that greenfield sites in the open countryside, disconnected from settlements are unlikely to be granted planning consent, and may be considered not suitable for development. Council owned sites without a resolution to dispose are considered not available for development.

Sites with an extant planning permission and those under construction are considered to be suitable through granting of planning permission, therefore site surveys will not be undertaken for these sites as part of the SHLAA process. However, development progress on sites will be monitored and site visits undertaken to the larger sites on an annual basis to verify progress.

Various factors will influence a site's potential for development. Where a significant technical constraint is highlighted, it will be referred to a relevant professional organisation or team for guidance and opinion. For example, Sunderland City Council's Highways or Ecology and Conservation Teams may be consulted or dialogue with external agencies may be considered most appropriate and suitable e.g. Highways Agency, Environment Agency, or Northumbrian Water.

Stage 2: Site Assessment

Once all sites have been collated as part of the site survey they will then be assessed for their suitability, availability and achievability for future development. Sites will be assessed against existing or emerging planning policy to enable the council to establish if a site can be considered to be deliverable over the plan period.

Estimating the housing potential of each site - Density

The NPPF does not identify an indicative minimum net density threshold. The PPG suggests that where considered appropriate to do so, density should reflect local characteristics. Where information is available from sources such as planning applications, pre-application discussions, development briefs, masterplans or allocations the known density information will be used.

For non-consented SHLAA sites where evidence of site densities is not available, it will be necessary to calculate housing potential. Density of housing varies across Sunderland. A 30 dph density assumption will be applied to the net developable area of a site as a starting point, to provide an indicative housing capacity for a site. Consideration will then be given to the site specifics including; planning history of a site; on and off site constraints; site viability issues; neighbouring residential densities; and the types of development likely to be achieved on the site. Where a Planning Officer deems it appropriate, a higher density of development will be applied. This may occur in instances where sites are located close to the centres of settlements where development density is often

higher than peripheral locations, or if in close proximity to public transport nodes (e.g. a metro station or bus interchange). This approach was endorsed in the Tyne and Wear Strategic Housing Land Availability Assessment (SHLAA) Sub-Regional Addendum Concept Paper and Supplementary Guidance and is further supported by the NPPF which encourages local planning authorities to establish local density requirements where appropriate.

Estimating the housing potential of each site – Net Developable Area

To estimate the housing potential of a site that does not have planning history, it is appropriate to consider the net developable area of the site. The definition of a net developable area of a site for the purposes of the SHLAA is; the likely proportion of the site which will be available for residential development, after taking into account provision of infrastructure, open space and other land uses designated to complement housing development. For larger sites a greater percentage of the total site area is deducted in order to present the developable area that can be used for housing. This takes into account other uses that are likely to be incorporated in to larger housing schemes such as education provision or the need for critical infrastructure such as new roads.

The Tyne and Wear Strategic Housing Land Availability Assessment (SHLAA) Sub-Regional Addendum Concept Paper and Supplementary Guidance set out assumptions for estimating net developable area which are considered appropriate for the SHLAA (Table 2).

Table 2: Indicative gross to net ratios for different site sizes

Gross site area (ha)	Percentage net
Less than 0.4 ha	100%
0.4 to 2 ha	75-90%
Over 2 ha	50-75%

The council welcomes continual dialogue with site developers throughout the SHLAA process regarding infrastructure provision and site constraints that would impact upon the net developable area of a site and deviate away from the assumptions identified in Table 2, above.

Estimating the housing potential of each site – Capacity Yield

Where there is ‘known’ information of a site capacity from planning applications, the call out for sites process or discussion with the council this will be taken into account. Where no such information has been provided, site capacity will be based on informed estimates, which may be subject to change as a detailed scheme is developed for a site. This is principally calculated from the ‘developable area’ multiplied by an appropriate housing density.

Suitability Assessment

In accordance with PPG the suitability of sites or broad locations for development should be guided by:

- The development plan, emerging plan policy and national policy;
- Market and industry requirements in that housing market area.

As the Unitary Development Plan (Part 1 &2) for Sunderland dates back to 1998 and 2007 respectively, policies pre-date the NPPF. In order to present a consistent approach across the county, the use of local development plan policies from these sources is limited in the assessment.

In addition, the Sunderland Core Strategy is in the early stages of plan preparation and therefore has not gained sufficient weight through the plan process to guide SHLAA suitability assessments at this point in time. However, this position will change and emerging policies will be considered once the Sunderland Core Strategy reaches the publication plan stage. The assessment of sites will be a dynamic process as the Local Plan progresses, with the need to update the suitability of sites in light of any emerging policy changes.

The following factors will be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk,
- hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas.

Information gathered at Stage 1 of the SHLAA methodology (desk top survey, site survey and information submitted as part of the site submission) will also inform the suitability assessment.

Sites designated as Category 2 sites will be assessed for their suitability. Although category 2 sites are not considered to be unsuitable there may be instances where the designations may affect the nature or extent of a development site, or the cumulative impact of Category 2 designations render a site unsuitable. Category 2 sites will be assessed for suitability on a site by site basis.

Table 3: Category 2 Designations

Allotments	Groundwater Flooding
Archaeological Site	Green Belt
Ancient Woodland	Heritage Coast
Agricultural land grade 1-3a	Historic Landscape
AHLV/or Area of Significant Historic Landscape	HSE Middle and Outer Zones
Conservation Area	Minerals Safeguard Area
Critical Drainage	Protected Species or Habitat
Coal Referral Area	Source Protection Zone
Designated Open Space	Surface Water Flooding
Non Designated Open Space	Settlement Break
EA Flood Risk Zones 2 and 3a	Wildlife/Green Infrastructure Corridor
Existing Car Park	2km of Coastal Wildlife Corridor (HRA)
Grade I Listed Building	6km of Coastal Wildlife Corridor (HRA)
Grade II* Listed Building	Local Nature Reserves (LNRs)
Grade II Listed Building	Local Wildlife Sites (LWSs) and Local Geological Sites (LGSs)

Availability Assessment

A site is considered available for development, when, on the best information available (confirmed by the call out for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips, tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell. Although generally speaking the existence of a planning permission suggests a site is available, there may be instances where it does not.

In addition to the above, a sites existing use will also be considered in terms of its availability. Where an existing use is in operation on a site that requires relocation or needs to be wound down, the council will consider the availability of the site on a site by site basis. A site will be considered deliverable only where it can be demonstrated clearly, by a developer, agent or landowner that the existing use will cease operation speedily, allowing for housing development to come forward on the site in the five year period. Where this cannot be demonstrated a site will be assessed as developable.

Where potential problems are identified, then an assessment will need to be made as to how and when such issues can realistically be overcome. Consideration should also be given to the delivery record of the developers or landowners putting forward sites, and whether the planning background of a site shows a history of unimplemented permissions

In order to ensure a transparent and reasonable process, all sites are treated equally regardless of whether they are in public or private ownership. Sites lacking in precise information on ownership will be assessed as 'not currently available' at this point in time.

Achievability Assessment – including Viability

In accordance with the PPG a site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.

Achievability will be affected by:

- market factors – such as adjacent uses, economic viability of existing, proposed and alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales (particularly important for larger sites);
- cost factors – including site preparation costs relating to any physical constraints, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development; and
- delivery factors – including the developer's own phasing, the realistic build-out rates on larger sites (including likely earliest and latest start and completion dates), whether there is a single developer or several developers offering different housing products, and the size and capacity of the developer.

Local housing market factors form part of various components of its planning evidence base, including through a Viability Assessment and Strategic Housing Market Assessment. This evidence will be used to underpin the assessment of sites as part of the SHLAA. The evidence includes examination of sales values, levels of sales, and market demand. Consideration will also be given to precise localities and the attractiveness of areas as places to live. The achievability assessment will also be informed by other information which is gathered during the site survey or the desktop review.

Cost factors will similarly be informed by other evidence based studies, including the most recent Economic Viability Assessment. Cost factors will additionally be informed by site survey and desk-top review which will consider site specific characteristics and the potential for abnormal costs.

National Planning Practice Guidance indicates that the achievability assessment should also consider the capacity of a developer to compete or sell homes over a certain period.

What happens when constraints are identified that impact on the suitability, availability and achievability assessment of a site?

Where site constraints have been identified, the assessment should consider what action would be needed to remove or mitigate against them, along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered. In some instances, some sites may require further dialogue with external professional agencies and the landowner/developer to establish an acceptable resolution to dealing with constraints of sites. Examples of constraints may include

investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, access solutions/proposals or reviewing planning policies which restrict development.

How should the timescale and rate of development be assessed and presented?

Once the suitability, availability and achievability of sites have been assessed, and any constraints identified, the likely timescale and rate of development for each site will be able to be assessed. This will be continuously updated throughout the Local Plan process, with advice being sought from developers on likely timetables for construction start up, site preparation, delivery rates for sites and any further constraints which may arise.

Sites with planning consent

The NPPF indicates that sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years⁵.

For large sites with planning consent (those of five units or more), the Council will consult directly with land owners and developers, in order to obtain up to date delivery information about a site. Unless the Council has good reason not to do so, delivery forecast information received will be accepted. When no information is received, delivery information from previous years will be used to inform a delivery forecast. If no recent delivery information has been obtained, delivery assumptions will be applied.

Sites without planning consent

PPG indicates that planning permission is not a prerequisite for a site to be considered deliverable within five years. However, the council will make a general assumption that sites without planning consent sites will not deliver within five years unless there is evidence to suggest otherwise.

Sites without planning consent that may start to deliver within five years may include;

- sites where an application is expected to be submitted within 12 months;
- sites which have gained planning approval while the SHLAA is being collated (i.e. approved after the SHLAA publication base date)
- sites where there is a pending application recommended for approval and are most likely to progress (this includes sites with a resolution to approve subject to a S106 agreement)

These sites will be considered part of the five year land supply. Occasionally other non-consented sites may be included in the five year supply. Where this occurs reasoned justification for this will be provided.

Otherwise, sites will be assumed to start to deliver within 6-10 years. Where significant constraints are identified, or sites appear to represent a later phase of an adjacent development, they will be assumed to start to deliver within 11-15 years.

Table 4 shows the delivery and build out rate assumptions that have been applied to the SHLAA sites where no information about delivery rates has been received. A standard rate of 30 dwellings per

⁵ National Planning Policy Framework, DCLG, Para 47, Footnote 11

annum will be used for a single developer site. It is however, acknowledged that delivery rates for single developer sites maybe higher where market demand is higher for the product on offer. Where developers indicate that a higher delivery rate is possible for their site, this will be taken into consideration and reflected in delivery forecasts for the site.

Table 4: SHLAA sites with and without consent – delivery assumptions

Site Category	Assumption
Sites under construction	Delivery of units will continue at the previous rate. If there is no delivery history, delivery of units will start from year 1 at a rate of no more than 30 dwellings per annum
Small sites under construction or with extant permission	Delivery of units will be determined by the application of an average delivery rate, based on historical small site delivery rates, and will start to delivering from years 1. This is referred to as a small site windfall allowance
Sites with full planning consent (including recent permissions since SHLAA base date)	Delivery of units will start from year 2 at a rate of no more than 30 dwellings per annum
Sites with outline planning consent (including recent permissions since SHLAA base date)	Delivery of units will start from year 3 at a rate of no more than 30 dwellings per annum
Developable sites with applications pending a decision (including those subject to S106 agreement)	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Allocated housing sites with known recent developer interest	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Developable sites on which an application is expected within 12 months	Delivery of units will start from year 4 at a rate of no more than 30 dwellings per annum
Other developable SHLAA sites	Delivery of units will start from year 6 at a rate of no more than 30 dwellings per annum.

Where it is known that there are two developers on a site, an assumption will be made that housing will be delivered at a standard rate of 40 dwellings per annum (20 dwellings per annum each). Similarly multi developer sites with three or more outlets will also reflect a 20 dwellings per annum build out rate per outlet. Where developers indicate higher rates of delivery, this will be taken into consideration and reflected in delivery forecasts for a site. The Council will keep these delivery assumptions under review and seek advice from the development industry to ensure they remain appropriate.

The NPPF requires that sites are considered to be deliverable, developable or not currently developable for housing development. The NPPF defines deliverable and developable as:

- Deliverable – a site is available now, offers a suitable location for housing development now, and is achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning

permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years; and

- Developable – a site should be in a suitable location for housing development, and there should be a reasonable prospect that housing could be developed within 6-10 years or 11-15 years or beyond.

Stage 3 – Windfall Sites, Demolitions & Empty Homes

Windfall

Paragraph 48 of the NPPF states that Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the historic windfall delivery rates and expected future trends, and should not include residential gardens.

Windfall sites are defined as those which have not been specifically identified as available in the Local Plan process, and normally comprise previously developed sites that have unexpectedly become available⁶. Therefore, sites identified in the SHLAA cannot be considered windfall.

The SHLAA is thought to be sufficiently comprehensive that sites of five units or more are identified in the SHLAA and would not consistently become available in the next five year period. However beyond this period it is unknown how many windfalls will come forward for development. By their nature, windfalls are an unknown quantity and can unexpectedly become available without warning, through for example, closure of a factory as a result of a consolidation of a company's assets. Forecasting their availability based on their unpredictability is difficult. Therefore it would be appropriate to make an allowance for a nominal number of windfall units that would come forward per annum, from year 6 onwards which will be kept under annual review. An annual windfall contribution of 50 units per annum will be forecast from year 6 onwards.

In addition to large site windfalls, small housing sites (4 units or less) may become available that are not identified through the Local Plan process. Therefore a small site windfall allowance will be calculated annually to forecast housing delivery on small sites based on historic trends. Unlike large site windfalls small sites will be forecast from year 1, as the SHLAA site threshold of 0.25 hectares, or 5 units or more, results in the exclusion of small sites from the housing land supply, although evidence suggests that they come forward annually through annual housing completion returns.

Windfall assessments will be made and published annually through the council's Authority Monitoring Report (AMR). This will include an assessment of historic windfall delivery rates as well as the expected future trend for windfall delivery. Windfall allowances will be monitored annually and adjusted upwards or downwards accordingly depending on the delivery rate of windfalls and known information regarding windfall sites that becomes known to the authority.

Demolitions

⁶ National Planning Policy Framework, DCLG, Annex 2, p57

Sunderland City Council has historically experienced high levels of demolitions as a result of significant housing stock clearance and renewal undertaken by registered providers within the city area (Table 5) as well as the Council through its area renewal programme. However, large scale demolitions of this nature are no longer anticipated to occur going forward. However it would be pertinent to account for a nominal loss attributable to demolitions/net losses going forwards as they can come forward through the planning process. An annual loss of 50 units per annum from year 6 onwards will forecast.

Table 6: Sunderland Demolitions 2007-2016

	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
Demolitions	-566	-527	-216	-343	-278	-202	-3	0	-24

Demolitions and net losses to housing stock will be monitored on an annual basis through the Annual Monitoring Report (AMR) and will be adjusted upwards or downwards accordingly depending on the rate of demolitions and known information regarding demolition schemes known to the authority.

Empty Homes – bringing vacant properties back into use

The NPPF identifies that local planning authorities should identify and bring back into use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers. The PPG further supports this, stating that “Empty homes can help to contribute towards meeting housing need but it would be for individual local authorities to identify and implement an empty homes strategy. Any approach to bringing empty homes back into use and counting these against housing need would have to be robustly evidenced by the local planning authority at the independent examination of the draft Local Plan, for example to test the deliverability of the strategy and to avoid double counting (local planning authorities would need to demonstrate that empty homes had not been counted within their existing stock of dwellings when calculating their overall need for additional dwellings in their local plans)”⁷.

Bringing empty homes back into use is a good source of housing supply as it assists to rejuvenate streets, areas and communities blighted by long term empty properties. Sunderland City Council produces an annual Empty Homes Action Plan to establish a target for bringing empty private sector homes back into use for the forthcoming financial year. The Council’s current 2016/17 target for bringing back into use empty homes 45 units. Going forward the Council will be seeking to bring back into use 250 empty properties over a five year period (2017-2022).

A series of implementation measures will ensure that empty properties are brought back into use, including; making available financial assistance projects; use of enforcement powers to enforce property sales, where required; application of Empty Dwelling Management Orders and implementation of s215 of the Town and country Planning Act 1990 orders; and the compulsory purchase of properties.

⁷ Planning Practice Guidance; Housing and economic land availability assessment para 39 ID 3-039-20140306

An element of funding is committed from S106 contributions, New Homes Bonus and Homes and Communities Agency funding to return empty properties back into use.

Stage 4 – Assessment Review

Review Assessment and prepare trajectory

Following the assessment of all sites, the development potential of all sites can be collected to produce an indicative trajectory. This should set out how much housing land can be provided, and at what point in the future. An overall risk assessment will be made as to whether sites will come forward as anticipated.

If insufficient sites have been identified against objectively assessed need, then the council will need to revisit assumptions. Following the review if there are still insufficient sites, then it will be necessary to investigate how this shortfall will be planned for. If there is evidence that the needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the Duty to Cooperate.

Identify specific developable sites or broad locations for housing growth for year 11-15

The Planning Practice Guidance allows for the investigation of potential broad locations where identifiable sites will not provide sufficient land for housing and economic land to meet the land supply requirement for 15 years (or more). Identification of broad locations for housing and other strategic development is supported by the National Planning Policy Framework (paragraphs 47 and 157).

Stage 5 – Final Evidence Base

SHLAA Data Outputs

Once the assessment has been completed, a SHLAA report will be produced. The following outputs will be produced to ensure consistency, accessibility and transparency.

1	A list of all sites, or broad locations, cross-referenced to their locations on maps; This will include lists of: <ul style="list-style-type: none"> • Deliverable sites • Developable sites • Sites with identified constraints and identified approaches to overcome these (uncertain sites). • Sites not considered currently developable • Sites sieved out in the early stages of the assessment (Category 1 sites and, SCC sites without a resolution to dispose);
2.	An assessment of each site or broad location, in terms of its suitability for development, availability and achievability (including whether the site is viable) to determine whether a site is realistically expected to be developed and when;
3.	Contain more detail for those sites which are considered to be realistic candidates for development. Where others have been discounted, reasons will be evidenced and justified;
4.	The potential quantity of development that could be delivered on each site, including a reasonable estimate of build out rates, setting out how any barriers to delivery could be overcome and when;

5.	An indicative trajectory of anticipated development (will indicate for each site the year(s) in which dwellings are expected to be delivered for the first five year period and the five year band thereafter) and consideration of associated risks.
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Monitoring

The Council will continuously monitor the schedule of SHLAA deliverable and developable sites. The Council will on an annual basis publish the Housing Trajectory and Five Year Land Supply position paper as part of the authorities Annual Monitoring Report.

Five Year Land Supply

NPPF requires local planning authorities to identify and maintain a rolling five-year supply of deliverable housing land. The assessment of this supply is a material consideration in the determination of residential planning applications and helps to ensure that the objectively assessed housing needs of the local area are met over the life of the plan period.

The Council will prepare a separate five year housing supply report. This information will be updated on an annual basis to reflect any new sites that become available and any change in circumstance with existing sites. Planning Practice Guidance requires a five year housing supply report to be produced annually. The base date of the reports will be 31 March and will look forward to the next five years.

**Appendix A: Sunderland SHLAA Methodology – Schedule of Consultation
Responses – 19 October 2016 – 2 November 2016**

Response No.	Developer/Individual	Agent	Response	Council's Response
1	Barratt David Wilson (North East)	Spawforths	The use of standardised assumptions for developable area ratio, build rates, lead-in times and density are in principle acceptable. Barratt David Wilson Homes does, however, advocate discussion with the relevant site developer so that the implications of infrastructure provision, site constraints and construction start-up can be properly assessed and built into the trajectory for site completion. It is, however, recognised that this will not be possible in all circumstances.	Support for the use of standardised assumptions for developable area ratio, build rates, lead in times and density in principle is noted. Amendment to methodology will be made to reflect Council's commitment to ongoing dialogue with developers, where possible, regarding infrastructure provision, site constraints and construction start up are accounted for in land supply trajectories.
2	Barratt David Wilson (North East)	Spawforths	Where standardised assumptions are utilised it is important that these are supported by robust up to date evidence (PPG paragraph 3-031). This could include analysis of the patterns and timescales of sites recently approved or evidence gathered via discussions with developers at section 78 appeals. The evidence used in the derivation of the Council's assumptions should be made publicly available to enable independent analysis of the Council's proposed assumptions. The SHLAA should also set out how the assumptions have been applied, particularly where a range is used. The provision of this data will provide clarity, consistency and transparency to the key assumptions.	Comments noted. Standardised assumptions are used to forecast commencement and delivery of a site where information from the developer/applicant can not be sourced and are pragmatic assumptions that will have to pass endorsement from the SHLAA Partnership, which will compose experts members, including development industry representatives. Developers/landowners/agents will have the ability to propose alternative commencement periods and delivery rates based on their intent for a site, which will be considered by the council and may be used instead of one of the assumptions detailed in Table 4. This will ensure that a robust forecast of housing delivery can be demonstrated on an annual basis.
3	Barratt David Wilson (North East)	Spawforths	Barratt David Wilson Homes agrees the net developable area will vary with larger sites tending to have a lower ratio, due to the need to take account for infrastructure and other facility requirements. However, we are concerned that a range is being proposed as opposed to a single percentage assumption. For clarity and certainty we would suggest that a single gross to net ratio assumption be utilised. This figure should be at the mid-point of the range proposed. We consider on larger sites for example that the 75 percent ratio for sites above 2ha is likely to be too high in many cases, particularly on larger sites due to the inevitable increase in infrastructure requirements. We would suggest from experience that on larger sites the gross to net ratio tends to be towards 65 percent. Similarly on sites between 0.4ha and 2ha the gross to net ratio tends to be towards 80 percent.	When taking account of a net developable area for a site a number of constraints will be considered including ecological, biodiversity, flood risk, infrastructure and facility provision. A range is proposed within table to allow for flexibility in calculating the net developable area as some sites are more constrained than others. A single percentage within this range will be chosen and applied to the site which will reflect the level of constraint on the site. It is proposed that a SHLAA schedule of sites will identify the net developable area for each site which will be reviewed and endorsed by the SHLAA Panel (a sub group of the SHLAA partnership). The suggestion of a decrease in the low point of a range is acknowledged and will be considered and posed to the SHLAA partnership for consideration and agreement.

Response No.	Developer/Individual	Agent	Response	Council's Response
4	Barratt David Wilson (North East)	Spawforths	We note that the Council are proposing to adopt a standard 30 dwellings per hectare across all sites. However, in earlier SHLAA's the Council previously suggested that low, medium and high densities would be utilised depending on market areas. Therefore justification to this amended approach should be provided. Given the variation in market characteristics within Sunderland a more bespoke approach to different market areas may be more appropriate.	Current commitments demonstrate that a wide range of 'dwellings per hectare' are being delivered on various sites across the city area. 30 dwellings per hectare provides an indicative midpoint density per hectare that could be achieved for a site. The council considers the 30 dph application is representative of the SHMA evidence base which identifies a need for family housing and executive homes in the city area. The council encourages continuous dialogue with developers to provide density and capacity information in regard to specific site densities and capacities, as part of the SHLAA consultation process.
5	Barratt David Wilson (North East)	Spawforths	Barratt David Wilson Homes generally supports the Council's test of suitability. We would however, request further analysis of historic Development Plan allocations and unimplemented planning permissions. Planning Policy Guidance (PPG) advises that local authorities should explore the potential of such sites for alternative land use where the market demonstrates a lack of attractiveness for the particular development proposed (ID: 3-020-20140306). In our experience, this assessment is sometimes carried out as a test of achievability (viability), meaning the site in question is not discounted from the supply but instead phased medium to long term (developable). The PPG and paragraph 30 of SHLAA, cite market attractiveness as a test of suitability. In other words, if there is no reasonable prospect of a site coming forward for a particular use it should be considered unsuitable as it is neither deliverable nor developable under the definitions presented by the Framework.	Comments noted. A site's achievability will be reviewed through the SHLAA on an annual basis, in conjunction with the SHLAA Panel (a sub group of the SHLAA Partnership). This will ensure that all sites within the supply are deliverable and developable. It is important to distinguish that a site that is identified as "not achievable" due to market attractiveness at a point in time, does not make a site unsuitable for housing, it just renders the site undeliverable at that point in time. Market attractiveness can change and this will be reviewed annually through the SHLAA process.
6	Barratt David Wilson (North East)	Spawforths	Barratt David Wilson Homes generally supports the Council's test of availability. The SHLAA identifies that where potential problems are identified regarding the availability of a site (i.e ransom strips, unresolved land assembly, restrictive covenants), an assessment will be made as to how and when such issues can realistically be overcome. We believe the site's existing use must be considered as part of this test too. For example, if the existing use requires relocation before commencement the site cannot be considered available now and therefore should be considered developable at best and suitably phased within the trajectory directed further by marketability.	Support for the test of availability noted. A site's existing use will be considered when assessing a site's availability and whether it is deliverable in the five year period or developable from year six onwards. An amendment to the methodology will be made under "Availability Assessment", to reflect existing land use in the consideration of a site's availability.

Response No.	Developer/Individual	Agent	Response	Council's Response
7	Barratt David Wilson (North East)	Spawforths	Furthermore, the draft methodology does not demonstrate how the SHLAA will consider the availability of publicly owned land. A clear disposal programme should be published alongside the SHLAA to demonstrate each site's deliverability.	Comments noted. It is intended that an availability summary for each site will identify whether a site will be available for disposal and provide an indicative timeframe for disposal.
8	Barratt David Wilson (North East)	Spawforths	Market Factors: Barratt David Wilson Homes would like to highlight that market factors are an important consideration. As part of work on SHLAA Panels elsewhere in the North East (Northumberland & Durham), Barratt David Wilson Homes provided an indication of market attractiveness and projected sales rates for sites. This process consisted of applying a simple 'green, amber or red' coding to each locality throughout the study area. Green indicates a healthy market where we would be confident of delivery, amber would represent a moderate market where although there would still be interest the annual sales rate may not be as high and red would denote those areas considered least attractive to the market. Such a process should be included as part of preparing this SHLAA.	Comments noted. The Council will seek to work with the Sunderland SHLAA Panel to identify areas of market attractiveness using the 'green, amber, red' coding approach for the city area.
9	Barratt David Wilson (North East)	Spawforths	Delivery Factors: Barratt David Wilson Homes appreciates that sites with planning permission should be considered deliverable until the permission expires, unless there is clear evidence that schemes will not be implemented in 5 years. However, historic applications which have been continuously renewed or those which are only outline and nearing expiry should be considered developable due to lack of certainty. When calculating a 5-year land supply a minimum discount of 10 percent should be applied to unimplemented commitments.	It is intended that a developer consultation will be undertaken for all sites with extant planning permission to forecast the commencement and delivery rates for a site after planning permission is granted to gauge expected delivery of a site. Where there is evidence of historic renewal of applications, without commencement and delivery of housing, this will be considered and may not be included in the five year supply if the developer can not provide sufficient evidence to demonstrate otherwise. This will ensure that a robust forecast of housing delivery can be demonstrated on an annual basis.

Response No.	Developer/Individual	Agent	Response	Council's Response
10	Barratt David Wilson (North East)	Spawforths	Barratt David Wilson Homes agree largely with the delivery assumptions and lead-in times, which appear relatively pragmatic and appropriate. However, the build rate of 30 dwellings per annum which is being utilised for most types of sites should be fully evidenced. However, it should be clarified in the table that where the table states "delivery will start from year ..." that this relates to the delivery of units and not necessarily a site start as sites can have typically 6-18 months of prelims, abnormal and pre-conditions prior to the commencement of actual dwellings, depending on site constraints. The delivery rate and timescales will therefore depend significantly on site constraints but also market factors.	Comments noted. Clarification will be provided within the table to identify delivery of units and not a site start. The council encourages dialogue with developers of sites regarding the commencement year of a site and anticipated year of delivery of units, should they disagree with the assumptions. This will ensure a realistic site by site approach is taken when forecasting delivery of units on sites.
11	Barratt David Wilson (North East)	Spawforths	Furthermore, we have concerns over the category of sites without planning consent. This category requires further justification and substantiation, particularly the portion of the category related to "sites where an application is expected to be submitted within 12 months". These sites need to be fully evidenced. It is noted however that such sites will only be assumed to be delivering units from year 4 onwards, which is considered appropriate.	Such sites may have had positive pre-application discussions and it may be known when an application is anticipated. Such instances and application of this assumption will be evidenced in the published schedule of SHLAA sites.
12	Barratt David Wilson (North East)	Spawforths	<p>Barratt David Wilson Homes accepts that windfall sites form part of the housing land supply. The Framework states a windfall allowance can be included within the Local Plan (para 48), however this must be based upon robust and compelling evidence that such sites have come forward in the past and will continue to come forward. That evidence must therefore be published to justify such an approach. However, we would like to assert that windfalls should not be relied upon to meet the five year housing land supply or to meet the full Objectively Assessed Need.</p> <p>Barratt David Wilson Homes is encouraged that large sites will not form part of the windfall allowance as these will generally be identified in the SHLAA. Therefore, the only windfalls will be on sites smaller than 0.4ha. Nevertheless, a windfall assumption needs to be based on evidence which clearly shows historic trends plus also likely expected future delivery. We consider that delivery from windfalls will reduce in future years compared to past trends due to the effect of having an up to date plan with allocations and a more rigorous and up to date Strategic Housing Land Availability Assessment (SHLAA).</p>	Comments noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
13	Barratt David Wilson (North East)	Spawforths	Barratt David Wilson Homes are encouraged that a SHLAA Partnership group will be established to assist in the preparation of the SHLAA.	Comments noted.
14	Barratt David Wilson (North East) - J Reid		BDW agrees that the net developable area will vary with larger sites tending to have a lower gross to net ratio. However, we consider that a single assumption percentage rather than the range proposed should be applied for strategic sites where significant land is required for the provision of infrastructure and other facility requirements. We would also suggest that the Council include a standard definition of net developable area within their SHLAA methodology.	<p>A range is proposed to allow for flexibility in calculating the net developable area as some sites are more constrained than others. It is proposed that a SHLAA schedule of sites will identify the net developable area for each site which will be reviewed and endorsed by the SHLAA Panel (a sub group of the SHLAA partnership).</p> <p>The suggestion of a decrease in the low point of a range for strategic sites is acknowledged and will be considered and posed to the SHLAA partnership for consideration and agreement.</p> <p>A definition of net developable area will be identified within the methodology for clarity.</p>
15	Barratt David Wilson (North East) - J Reid		<p>BDW generally supports the Council's test of suitability. We would however, request further analysis of historic Development Plan allocations and unimplemented planning permissions. Planning Policy Guidance (PPG) advises that local authorities should explore the potential of such sites for alternative land use where the market demonstrates a lack of attractiveness for the particular development proposed (ID: 3-020-20140306).</p> <p>In our experience, this assessment is sometimes carried out as a test of achievability (viability), meaning the site in question is not discounted from the supply but instead phased medium to long term (developable). The SHLAA methodology and PPG cite market attractiveness as a test of suitability. In other words, if there is no reasonable prospect of a site coming forward for a particular use it should be considered unsuitable as it is neither deliverable nor developable under the definitions presented by the NPPF.</p>	Comments noted. A site's achievability will be reviewed through the SHLAA on an annual basis, in conjunction with the SHLAA Panel (a sub group of the SHLAA Partnership). This will ensure that all sites within the supply are deliverable and developable. It is important to distinguish that a site that is identified as "not achievable" due to market attractiveness at a point in time, does not make a site unsuitable for housing, it just renders the site undeliverable at that point in time. Market attractiveness can change and this will be reviewed annually through the SHLAA process.

Response No.	Developer/Individual	Agent	Response	Council's Response
16	Barratt David Wilson (North East) - J Reid		<p>BDW generally supports the Council's test of availability. The SHLAA identifies that where potential problems are identified regarding the availability of a site (i.e ransom strips, unresolved land assembly, restrictive covenants), an assessment will be made as to how and when such issues can realistically be overcome. We believe that the site's existing use must also be considered. For example, if the existing use requires relocation before commencement the site cannot be considered available now and therefore should be considered developable at best and suitably phased within the trajectory further directed by marketability.</p> <p>The draft methodology does not demonstrate how it will consider the availability of publicly owned land. BDW suggests that unless a clear disposal strategy is presented alongside the SHLAA the site in question cannot be considered available and therefore deliverable.</p>	<p>Support for the test of availability noted. A site's existing use will be considered when assessing a sites availability and whether it is deliverable in the five year period or developable from year six onwards. An amendment to the methodology will be made to reflect existing land use in the consideration of a sites availability.</p> <p>Comments noted. It is intended that an availability summary for each site will identify whether a site will be available for disposal and provide an indicative timeframe for disposal.</p>
17	Barratt David Wilson (North East) - J Reid		<p>Market Factors – Described as “adjacent uses, economic viability of existing, proposed or alternative uses in terms of land values, attractiveness of the locality, level of potential market demand and projected rate of sales”. BDW has undertaken an exercise as part of our SHLAA Panel duties in Northumberland and Durham to indicate the market attractiveness of different areas. It consisted of applying a simple ‘green, amber or red’ coding to each locality throughout the study area. Green indicates a healthy market where BDW would be confident of delivery, amber would represent a moderate market where although there would still be interest the annual sales rate may not be as high and red would denote those areas considered least attractive to the market.</p>	<p>Comments noted. The Council will seek to work with the Sunderland SHLAA Panel to identify areas of market attractiveness using the 'green, amber, red' coding approach for the city area.</p>
18	Barratt David Wilson (North East) - J Reid		<p>Cost Factors – Including “site preparation costs relating to any physical, any exceptional works necessary, relevant planning standards or obligations, prospect of funding or investment to address identified constraints or assist development”. BDW welcomes SCC identifying that each site will be subjected to the Sunderland Viability Model.</p>	<p>Support noted.</p>

Response No.	Developer/Individual	Agent	Response	Council's Response
19	Barratt David Wilson (North East) - J Reid		Delivery Factors – BDW appreciates that sites with planning permission should be considered deliverable until the permission expires, unless there is clear evidence that schemes will not be implemented in 5 years. However, historic applications which have been continuously renewed or those which are only outline and nearing expiry should not be considered deliverable due to lack of certainty. When calculating a 5-year land supply a minimum discount of 10% should be applied to unimplemented commitments.	It is intended that a developer consultation will be undertaken for all sites with extant planning permission to forecast the commencement and delivery rates for a site after planning permission is granted to gauge expected delivery of a site. Where there is evidence of historic renewal of applications, without commencement and delivery of housing, this will be considered and may not be included in the five year supply if the developer can not provide sufficient evidence to demonstrate otherwise. This will ensure that a robust forecast of housing delivery can be demonstrated on an annual basis.
20	Barratt David Wilson (North East) - J Reid		BDW welcomes the use of standard delivery assumptions. It would be useful for the Council to present their assumptions behind these delivery rates, such as time it takes to achieve planning permission, land/legal assembly and site preparation period. As suggested by our comments on achievability, the Council should clearly indicated the projected annual delivery rates for each settlement/market within the authority.	Support noted.
21	Barratt David Wilson (North East) - J Reid		BDW accepts that windfall sites form part of the housing land supply. However, they should be relied upon to meet the 5 year housing land supply or minimum objectively assessed need given the economic ambitions of the emerging Local Plan.	Comment noted.
22	Esh	NLP	Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.	Comments noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
23	Esh	NLP	With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.	Comments noted.
24	Esh	NLP	We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.	Support noted.
25	Esh	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
26	Esh	NLP	We have also reviewed the assumptions in respect of the commencement of development and consider that the approach is reasonable. The approach appears to respond positively to PPG which advises that " <i>Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply</i> ".	Support noted.
27	Esh	NLP	We consider that a broad assumption of 30 dwellings per annum is a reasonable delivery rate assumption. Notwithstanding this, it is important to consider " <i>The advice of developers and local agents...</i> " where available in assessing the lead in times and build out rates on a site by site basis in line with PPG.	Support noted.
28	Esh	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
29	Esh	NLP	<p>With regards to an allowance for windfall sites, NPPF paragraph 48 states that <i>"Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply"</i>.</p> <p>This statement is acknowledged on page 12 of the SHLAA Methodology document which also sets out the Council's proposed approach. Whilst the Council propose to include a small site windfall allowance, based on historic trends, the Council state that sites of five units of more would not consistently become available to warrant a large site windfall allowance.</p> <p>We support the above approach and will seek to ensure that any windfall allowance relates to compelling evidence in accordance with NPPF paragraph 48.</p>	Support noted.
30	Hellens	NLP	<p>Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.</p>	Comments noted.
31	Hellens	NLP	<p>With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.</p>	Comments noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
32	Hellens	NLP	We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.	Support noted.
33	Hellens	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
34	Hellens	NLP	We have also reviewed the assumptions in respect of the commencement of development and consider that the approach is reasonable. The approach appears to respond positively to PPG which advises that " <i>Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply</i> ".	Support noted.
35	Hellens	NLP	We consider that a broad assumption of 30 dwellings per annum is a reasonable delivery rate assumption. Notwithstanding this, it is important to consider " <i>The advice of developers and local agents...</i> " where available in assessing the lead in times and build out rates on a site by site basis in line with PPG.	Support noted.
36	Hellens	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
37	Hellens	NLP	<p>With regards to an allowance for windfall sites, NPPF paragraph 48 states that "<i>Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply</i>".</p> <p>This statement is acknowledged on page 12 of the SHLAA Methodology document which also sets out the Council's proposed approach. Whilst the Council propose to include a small site windfall allowance, based on historic trends, the Council state that sites of five units of more would not consistently become available to warrant a large site windfall allowance.</p> <p>We support the above approach and will seek to ensure that any windfall allowance relates to compelling evidence in accordance with NPPF paragraph 48.</p>	Support noted.
38	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	<p>Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.</p>	Comments noted.
39	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	<p>With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.</p>	Comments noted.
40	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	<p>We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.</p>	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
41	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
42	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	We have also reviewed the assumptions in respect of the commencement of development and consider that the approach is reasonable. The approach appears to respond positively to PPG which advises that " <i>Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply</i> ".	Support noted.
43	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	We consider that a broad assumption of 30 dwellings per annum is a reasonable delivery rate assumption. Notwithstanding this, it is important to consider " <i>The advice of developers and local agents...</i> " where available in assessing the lead in times and build out rates on a site by site basis in line with PPG.	Support noted.
44	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.
45	Lord Durham Estate (Biddick Wood, West Herrington & Land at Penshaw)	NLP	<p>With regards to an allowance for windfall sites, NPPF paragraph 48 states that "<i>Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply</i>".</p> <p>This statement is acknowledged on page 12 of the SHLAA Methodology document which also sets out the Council's proposed approach. Whilst the Council propose to include a small site windfall allowance, based on historic trends, the Council state that sites of five units or more would not consistently become available to warrant a large site windfall allowance.</p> <p>We support the above approach and will seek to ensure that any windfall allowance relates to compelling evidence in accordance with NPPF paragraph 48.</p>	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
46	Herrington Working Mens Club	NLP	Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.	Comments noted.
47	Herrington Working Mens Club	NLP	With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.	Comments noted.
48	Herrington Working Mens Club	NLP	We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.	Support noted.
49	Herrington Working Mens Club	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
50	Herrington Working Mens Club	NLP	We have also reviewed the assumptions in respect of the commencement of development and consider that the approach is reasonable. The approach appears to respond positively to PPG which advises that " <i>Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply</i> ".	Support noted.
51	Herrington Working Mens Club	NLP	We consider that a broad assumption of 30 dwellings per annum is a reasonable delivery rate assumption. Notwithstanding this, it is important to consider " <i>The advice of developers and local agents...</i> " where available in assessing the lead in times and build out rates on a site by site basis in line with PPG.	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
52	Herrington Working Mens Club	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.
53	Herrington Working Mens Club	NLP	<p>With regards to an allowance for windfall sites, NPPF paragraph 48 states that "<i>Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply</i>".</p> <p>This statement is acknowledged on page 12 of the SHLAA Methodology document which also sets out the Council's proposed approach. Whilst the Council propose to include a small site windfall allowance, based on historic trends, the Council state that sites of five units of more would not consistently become available to warrant a large site windfall allowance.</p> <p>We support the above approach and will seek to ensure that any windfall allowance relates to compelling evidence in accordance with NPPF paragraph 48.</p>	Support noted.
54	South Tyneside Council		Net Developable Area (p.10, Table 2) – for sites 0.4-2ha how will you decide whether to apply the upper or lower end of the 75-90% range, and similarly for the 50-75% range for sites >2ha? Perhaps this needs to be refined a bit further, together with consideration in terms of the NDA for sites if used for employment development? We ended up simply applying the higher 90% and 75% NDA proportions respectively for our SHLAA and Strategic Land Review, with a lower 40% proportion for employment use, but for refining our SLR following feedback to our recent public consultation we've now developed a slightly refined approach in relation to sites which might have more significant proportions of the site affected by flood risk zones – we'd be happy to discuss this with you.	Comments noted. Sunderland City Council welcomes the opportunity to liaise with our neighbours, South Tyneside Council, regarding their approach to net developable area.

Response No.	Developer/Individual	Agent	Response	Council's Response
55	South Tyneside Council		Availability Assessment (p.11/12) – you may wish to note your approach to the availability of council-owned sites, eg. I recall from the T&W SHLAA the Panel agreed that we should only regard council-owned sites to be available now if there has been a formal disposal notice in place or if one is expected to be approved within the next 6 months.	Comments noted. Sunderland City Council will identify council owned sites that are being disposed and will provide timescales and commentary for their disposal within the assessment of availability.
56	South Tyneside Council		Windfall sites (p.15) – you may wish to include an allowance for conversions as well as you small sites allowance, eg. we applied an allowance in our SHLAAs for unanticipated/unplanned conversions based on the average rate of net additional dwellings delivered by conversion additions and losses over the previous 5yrs.	Comments noted.
57	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.	Comments noted.
58	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.	Comments noted.
59	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
60	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
61	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	We have also reviewed the assumptions in respect of the commencement of development and consider that the approach is reasonable. The approach appears to respond positively to PPG which advises that " <i>Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply</i> ".	Support noted.
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63	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.
64	Story Homes (East House Farm Washington, Land East of Chester Road Penshaw & Stoney Lane Springwell)	NLP	<p>With regards to an allowance for windfall sites, NPPF paragraph 48 states that "<i>Local planning authorities may make an allowance for windfall sites in the five year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply</i>".</p> <p>This statement is acknowledged on page 12 of the SHLAA Methodology document which also sets out the Council's proposed approach. Whilst the Council propose to include a small site windfall allowance, based on historic trends, the Council state that sites of five units or more would not consistently become available to warrant a large site windfall allowance.</p> <p>We support the above approach and will seek to ensure that any windfall allowance relates to compelling evidence in accordance with NPPF paragraph 48.</p>	Support noted.

Response No.	Developer/Individual	Agent	Response	Council's Response
65	Taylor Wimpey	NLP	Having reviewed the Council's approach to the categorisation of sites, we broadly support the Council's list of Category 1 designations (as set out in Table 2 on page 8) and agree that it is reasonable to assume that sites covered entirely by category 1 designations have no reasonable potential for development. However this should not apply to sites which are only partially covered by category 1 designation, since this could preclude land on the remaining part of the site which can be developed. We also agree with the Council's approach to omit Council owned sites without a resolution to dispose from the assessment.	Comments noted.
66	Taylor Wimpey	NLP	With regards to Category 2 sites, which refer to sites identified with other policy designations, we strongly support the approach taken by the Council to include them within the assessment and to assess their suitability for development on a site by site basis. The Category 2 designations (set out in Table 3 on page 11) includes a broad range of designations, such as Green Belt, Historic Landscape and Coal Referral Area, which are likely to affect a large number of the submitted sites.	Comments noted.
67	Taylor Wimpey	NLP	We welcome the Council's willingness to continually accept further technical information in relation to submitted sites, to ensure the assessments are informed by accurate and up to date information.	Support noted.
68	Taylor Wimpey	NLP	We have undertaken a review of the delivery assumptions contained in Table 4 on page 14. Whilst the title for the table is incorrect, as it actually lists the assumptions for sites with and without planning permission, we consider that the approach taken and assumptions used are reasonable.	Support noted. Amendment will be made to table 4 to reflect the assumptions relate to consented and non consented SHLAA sites.
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70	Taylor Wimpey	NLP	We consider that a broad assumption of 30 dwellings per annum is a reasonable delivery rate assumption. Notwithstanding this, it is important to consider " <i>The advice of developers and local agents...</i> " where available in assessing the lead in times and build out rates on a site by site basis in line with PPG.	Support noted.
71	Taylor Wimpey	NLP	With regards to larger sites, we consider the Council's assumption of 40 dwellings per annum to be reasonable where two developers are on site. This should, however, be informed by discussions with landowners, developers and/or agents.	Support noted.
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Appendix B: Sunderland SHLAA Site Proforma

Contact Details				
Your Name				
Company Name				
Contact Address				
Email Address				
Contact Tel no.				
Are you a Registered Social Landlord?	YES		NO	
Site Details				
Site Address of the site you are suggesting for possible future housing development/Gypsy and Traveller/Travelling Showpeople provision				
Site reference no. (Only if site previously submitted and details/circumstances being updated)				
Site Area (hectares)				
I have enclosed a map clearly showing the site boundary	YES		NO	
(Please note that without a clear map showing a site boundary your suggestion may not be able to be progressed further)				

Are you the owner of the land?	YES	<input type="checkbox"/>	NO	<input type="checkbox"/>
If not, who is the registered owner? Please provide contact details				
What is the site/property currently used for? (If vacant/derelict please state last use)				
Do you consider the site to have potential to be used for residential use only or could it be utilised for mixed-use (i.e. some combination of residential, commercial, office, industrial, institutional, or other land uses)? If mixed-use, please give an indication of the other uses.				
Planning History (please include details of any existing or previous planning applications and decisions relating to the site, including application reference numbers and dates if known).				
In what timescale do you believe the site will become available for development?				

within next 5 years		6-10 years		11-15 years		15+ years	
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Please give your best estimate of when development could potentially begin if permission were to be granted, taking into account any constraints that could take some time to overcome (eg. land ownership, decontamination, etc.)?

What are the surrounding land uses to the site?

Are you aware of any sustainability issues, physical or infrastructure constraints (eg. topography, access, utilities, land instability) or land ownership issues and/or viability issues that might hinder development of the site? Please answer to the best of your knowledge.

What measures would you propose that might help to overcome these constraints?

What is the estimated number of dwellings (Plots/Pitches in relation to Gypsy and Travellers and Travelling Showpeople) that you think could be provided on the site? Some matters you might like to take into account are:

- the type of development likely to be suitable (purely residential or mixed-use)
- the mix of housing (house types and sizes)
- height and character of surrounding buildings

Any other issues/further comments

E-mail copies can be sent to: planningpolicy@sunderland.gov.uk

Paper copies can be returned to: Planning Policy Team, Planning and Regeneration, Sunderland City Council, Civic Centre, Burdon Road, Sunderland, SR2 7DN

