

## **Statements of Common Ground between Sunderland City Council and Prescribed Bodies**

1. Environment Agency
2. Highways England
3. Historic England
4. Marine Management Organisation
5. Natural England
6. Natural England and Hellens
7. Sunderland NHS Clinical Commissioning Group
8. University of Sunderland

**Sunderland Core Strategy and Development Plan  
2015 – 2033 (CSDP) Examination**

**Statement of Common Ground**

**as agreed between**

**Sunderland City Council and  
the Environment Agency**

**October 2018**

## Introduction

- 1.1 This Statement of Common Ground (SOCG) has been prepared jointly between the parties consisting of Sunderland City Council (the Council) and the Environment Agency (EA).
- 1.2 The Statement sets out the confirmed points of agreement between the EA and the Council with regard to the submitted Sunderland Core Strategy and Development Plan (CSDP) 2015-2033. The intention of the SOCG is to inform the inspector and other parties about the areas of agreement between the Council and the EA.

## Background

- 2.1 The Council has been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation the EA submitted a formal response to the draft plan on 26/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated the following issues:
  - The EA consider the CSDP to be sound (see PD206).
  - The EA are satisfied with both the Strategic Flood Risk Assessment Level 1 and Level 2 providing that the reports are submitted as part of the evidence base (see PD206 and PD207).
  - The EA outline concerns with regard to Policy SS3: Safeguarded Land. These concerns centre upon; significant flood risk from the River Don, adverse impacts on amenity; and the sites close proximity to permitted sites which the EA regulate. The EA express the view that they do not find the plan unsound on the basis of the safeguarded land policy but if through the examination process the argument is made for the safeguarded land to come forward in the plan period, the EA may wish to change their position (see PD208).
  - The EA set out the importance of 'estuary edge techniques' along the Wear estuary and Heritage Coast (see PD210 and PD209).
  - The EA fully supports Policy WWE4: Water Quality and in particular Part 4 of the policy which seeks to consider opportunities to improve the river environment and water environment (see PD211).
  - The EA suggest policy name changes to policy NE1 and NE4. The EA also support additional modifications to shore up the importance of water dependent habitats (see PD212 and PD213).

- The EA supports Policy HS3 Contaminated Land in general but would like to see the protection of controlled waters specifically referenced in part 1 in the Policy. The EA also suggests identified risks posed to controlled waters should be addressed and mitigated/ remediated where necessary (see PD214).
- The EA support Policy WWE2: Flood Risk and Coastal Management and the policy emphasis on directing development towards flood risk zone 1. The EA request the following inclusion; that as per the National Planning Policy Framework the Council would not support any development other than water compatible or essential infrastructure in flood risk zone 3b (see PD215).
- The EA support criteria relating to SuDS set out within policy WWE3: Water Management and policy WWE4: Water Quality. The EA request that where SuDS are proposed the suitability of the final drainage scheme is taken into consideration and care should be taken to ensure that any SuDS which speed up infiltration into the ground will not encourage leaching of pollutants into the groundwater aquifer (see PD216).
- The EA support Policy WWE5: Disposal of Foul Water but would recommend that the policy also covers the requirement for developments proposing the discharge of trade effluents (e.g. car wash development) to provide a Water Management Plan. Additionally, the EA advise all proposed drainage schemes, for both foul and surface water discharges, should be appropriate in their chosen location to avoid potential flooding events. An assessment of the suitability of any non mains drainage system is likely to be needed. The EA set out their concerns of SuDS impacting on the Magnesian Limestone Aquifer from both foul and surface water discharge (see PD217).
- The EA recommend Policy SP11: Mineral Extraction includes criteria for the potential risk from groundwater flooding. The policy suggests the need for a Water Management Plan where dewatering activity takes place to protect water quality particularly within 5km of the coast. The EA also ask for minor changes to the glossary (see PD218).
- The EA support Policy BH2 Sustainable Design and Construction and would like to see that it is delivered in accordance with Policy WWE2: Flood Risk and Coastal Management (see PD219).

## Agreed matters

3.1 Agreed matters are set out below and themed according to the EA representation.

### Soundness of the Plan (See PD206)

3.2 The EA consider the CSDP sound. The Council acknowledge this.

### Strategic Flood Risk Assessment Levels 1 and 2 (See PD207)

3.3 The Council agrees to submit the updated Strategic Flood Risk Assessment Level 1 and Level 2 electronically as evidence alongside the CSDP for examination. As part of the submission documents a link to the interactive appendices (which will be hosted online) will be submitted to the Planning Inspectorate.

### Safeguarded Land (See PD208)

3.4 The Council acknowledge the EAs concerns regarding Policy SS3 Safeguarded Land. The Council acknowledges that the EAs overall position on the soundness of the CSDP could change in context of a scenario where at examination the site is brought forward as a proposed allocation. The Council understands this position and agrees to maintain the position (currently set out at CSDP para 4, 46) that safeguarded land can only be released through a review of the Plan. In the event of the land coming forward the Council would work with the EA to prepare a sequential and exception test and ensure that development is located in a low flood risk areas.

### Estuary Edge Techniques (See PD209 and PD210)

3.5 The Council and the EA agree that no changes are required to Policy NE10: Heritage Coast (or the rest of the CSDP) as a result of comments regarding the incorporation of estuary edge techniques at the Heritage Coast. Policy NE10: Heritage Coast is restricted in scope to the (Sunderland part) of the Heritage Coast. This falls outside the estuary area. Consequently, it is not considered appropriate to add text regarding estuary edge techniques at Policy NE10. The Council consider the Allocations and Designation (DPD) would be a more appropriate planning mechanism to incorporate estuary edge techniques. The Council will work with the EA to incorporate estuary edge techniques into the Allocations and Designations Plan where appropriate.

### Setting Out the Importance of Blue Space and Water Dependent Habitats (See PD212 and PD213)

3.6 The Council and the EA agree to the following policy name change. That Policy NE1 is changed to incorporate the importance of blue infrastructure:

~~Policy NE1 Green Infrastructure~~ would change to NE1 Green and **Blue Infrastructure**. This is considered a minor modification.

(Council to insert mod ref)

3.7. The EA and the Council both agree that the following proposed major modification at part 1 of Policy NE1 (set out in bold) will be suggested to the appointed Planning Inspector during the

examination. At Policy NE1 part 1 below subsection viii, create a new sub clause – sub clause **ix** which will state the following (proposed major modification in bold):

<p><b>Policy</b></p> <p>NE1 Green <b>and Blue</b> infrastructure</p> <p>1. To maintain and improve the Green Infrastructure Network through enhancing, creating and managing multifunctional greenspaces and bluespaces that are well connected to each other and the wider countryside, development should:</p> <ul style="list-style-type: none"><li>i. incorporate existing and/or new green infrastructure features within their design and to improve accessibility to the surrounding area;</li><li>ii. address corridor gaps and areas of corridor weakness where feasible;</li><li>iii. support the management of existing wildlife corridors, including reconnecting vulnerable and priority habitats (see policy NE2);</li><li>iv. apply climate change mitigation and adaptation measures, including flood risk and watercourse management;</li><li>v. link walking and cycling routes to and through the corridors, where appropriate;</li><li>vi. include and/or enhance formal and natural greenspace and bluespace provision;</li><li>vii. protect and enhance landscape character; and</li><li>viii. have regard to the requirements of the Green Infrastructure Delivery Plan and make contributions proportionate to their scale towards the establishment, enhancement and on-going management.</li><li><b>ix. <i>protect, enhance and restore watercourses, ponds, lakes and water dependant habitats.</i></b></li></ul> <p>2. Development that would sever or significantly reduce green infrastructure will not normally be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts and suitable mitigation and/or compensation is provided.</p>
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3.8 The Council has proposed the following minor modification at paragraph 10.2. and 10.8 in alignment with EA comments.

Para 10.2 (new next in bold):

*Green Infrastructure (GI) describes the strategic network of undeveloped land, comprising green, brown and blue spaces that define, connect and intersperse our built environments. It relates to spaces in public or private ownership, with or without public access. It includes landscapes, historic environments, natural habitats, biodiversity and geological features, greenspaces and woodland, linear corridors, and in the case of bluespaces it also includes waterways, lakes **water dependent habitats** and the sea.*

(Council to insert mod ref)

Para 10.8 (new next in bold):

*For the purpose of this policy the term biodiversity includes all statutory and non-statutory designated sites, protected species, priority habitats and species, wildlife corridors and habitats and species outside designated sites and not identified as a conservation priority but which are considered local important **including water-dependent, aquatic and marine habitats and species**. Geodiversity relates to the variety of rocks, minerals, fossils, landforms, sediments and soils, together with the natural processes that form and alter them which are considered nationally or locally important.*

(Council to insert mod ref)

#### **Contaminated Land (see PD214)**

3.9 The Council and the EA agree that no changes are required to Policy HS3 Contaminated Land and its associated background text. Both parties agree that the protection of controlled waters is adequately addressed through the existing policy wording and background text which identifies water pollution as contamination. This is demonstrated at:

- Part 1 of Policy HS3 Contaminated Land – which sets out all works (associated with development) considered to be contaminated land should be undertaken without the escape of contaminants which could cause unacceptable risk to health or to the environment.
- Paragraph 5.12 – identifies water pollution as contamination and requires developer and/or landowner to submit a report to demonstrate the remediation and management measures to deal with risks from site works, and health risks for end uses.

#### **Development within Flood Risk Zone 3B (see PD215)**

3.10 The Council and the EA agree that no changes are required to Policy WWE2 Flood Risk and Coastal Management and its associated background text. Both parties agree that restricting development within flood risk zone 3B is inherent within existing policy and wording. This is demonstrated at:

- Part 1 of Policy WWE2: which sets out a sequential and exceptions test for applicable applications
- Paragraph 11.9 – which sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where it is necessary without increasing flood risk elsewhere.
- Paragraph 11.10 – which states that development, should be directed toward locations which are at lowest risk from flooding.

#### **Sustainable Urban Drainage and Water Management of the Groundwater Aquifer (see PD216)**

3.11 The Council and the EA agree that no changes are required to the SuDS component of Policy WWE3 Water Management and Policy WWE4: Water Quality. EA concerns regarding the leaching of pollutants into the groundwater aquifer are dealt with at paragraphs 11.20, 11.21, 11.22 and further supported through the hydrological risk assessment requirement

set out in paragraph 11.23 and early engagement concerning water matters set out in paragraph 11.25.

#### Disposal of Foul Water (see PD217)

- 3.12 The EA and the Council both agree the following proposed major modification at Policy WWE5: Disposal of Foul Water will be put to the appointed planning Inspector during the examination. The changes are set out in red in the proposed changes to the policy.

#### Policy

#### WWE5: Disposal of Foul Water

1. Development should utilise the following drainage hierarchy:
  - i. connection to a public sewer;
  - ii. ii. package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption); then
  - iii. septic tank.
2. Development involving the use of non-main methods of drainage in areas where public sewerage exists or the use of Cess Pits will not be permitted.
3. Development of new or extensions/ improvements to existing waste water, sludge or sewage treatment works, will normally be supported unless the adverse impact of the development significantly
4. ***Where the development involves the disposal of trade effluent a foul Water Management Plan / drainage assessment will be required to demonstrate how the disposal of foul water is undertaken following the disposal hierarchy. This should include a trade effluent consent if connected to the sewerage system. Trade effluent is any liquid produced in the course of any trade or industry including car washes.***

#### Mineral Extraction (see PD218)

- 3.13 The Council and the EA agree new background text to Policy SP11: Mineral Extraction. The policy at Part 1 – iii states workings will not increase the potential of flood risk or surface water flooding. In connection with this component of the Policy, the Council and the EA agree the following minor modification to paragraph 13.2 (new text bold):

*Policy SP11 sets out the approach for dealing with planning applications for mineral extraction. The policy focuses on the key criteria that will be used to judge applications. Proposals for mineral extraction (including extensions to existing sites), will be required to robustly justify the requirement for extraction, specifically in relation to the need for the site to maintain supply in line with the latest Local Aggregate Assessment, sub-regional apportionment figure and the maintenance of the aggregates landbank. **In order to protect against the potential risks of***



***ground water flooding and protect water quality proposals which involve dewatering will require a Water Management Plan.***

The following change to the glossary will be undertaken as per EA recommendations:

**~~Magnesium~~ *Magnesian Limestone Aquifer*** - The eastern part of the city is built on Magnesium Limestone. This contains an aquifer (or underground layer of water-bearing permeable rock). This aquifer is extensively exploited for public water supply and is to be protected from contamination and pollution.

(Council to insert mod ref)


**Sustainable Design and Construction (see PD219)**


- 3.14 As the Plan should be read as a whole (as set out in CSDP para 4.3) both parties agree that there is no need for changes BH2: Sustainable Design and Construction.

## **Conclusion**

- 4.1 The EA stated that the Submitted Plan is considered sound and has been improved as a result of the minor modifications set out within this Statement of Common Ground. Whilst the plan is considered to be sound, the Council and the EA have suggested two major modifications to Policies NE1 and WWE5, which have improved the substance of these policies. Both parties note that these suggested changes will be considered by the Inspector during the course of the Examination.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		16/10/2018

Signed on behalf of		
Name and position	Signature	Date
James Hudson Senior Planning Advisor		30/10/2018

## Appendix 1: Environment Agency Comments

creating a better place



Louise Sloan  
City of Sunderland  
Development & Regeneration  
PO Box 102  
Sunderland  
Tyne and Wear  
SR2 7DN

**Our ref:** DN/2006/000167/CS-06/IS1-L01

**Date:** 26 July 2018

### **Sunderland Core Strategy and Development Plan – Publication Draft**

Thank you for the opportunity to comment on the Sunderland Core Strategy and supporting evidence base the Environment Agency finds the plan to be **Sound**.

However we wish to highlight the requirement of a Level 2 Strategic Flood Risk Assessment is undertaken for the Port of Sunderland as the site is currently not supported by Sequential and Exception tests. The Environment Agency have seen a draft copy of the Level 2 SFRA and provided that this is submitted as part of the evidence base for the Local Plan then we find the plan to be Sound.

### **Flood Risk and the SFRA**

In the last consultation of the Core Strategy and Development Plan we identified sites which were in Flood Zones 2 and 3, which were not supported by Sequential and Exceptions Tests. Further discussions have been carried out with the Local Authority and with the exception of the Port all other sites identified have been taken out of flood zones 2 and 3.

We have reviewed the Level 1 SFRA and are overall satisfied with the evidence base, however we would advise that the appendices are submitted alongside the Level 1 SFRA, which support the allocated sites within the Local Plan.

### **Policy SS5 The Port of Sunderland**

It has been recommended within the level 1 SFRA that the Port of Sunderland would be taken forward to a Level 2 SFRA assessment. We agree with this approach as some of the sites within the port will need to be investigated further, especially the COMAH (Control of Major Accident Hazard) site which use the ports infrastructure as a point of mass evacuation. In policy terms this will require a more detailed assessment within the Level 2 SFRA, which the local planning authority will need to agree upon. Whilst there has been no formal submission of the Level 2 assessment, the Environment Agency has seen a draft copy of the Level 2 assessment and agreed upon the principles within it. If this assessment will be part of the Local Plan evidence base then the EA finds the plan to be sound.



#### **Policy S33 Safeguarded Land**

We have concerns in relation to the safeguarded land policy within the Local Plan allocation. We advise that the safeguarded site is at significant flood risk from the River Don and as such we would not recommend that this is brought forward or safeguarded for more vulnerable development such as housing. This is in line with the National Planning Policy Framework which advises that through a sequential approach more vulnerable developments such as residential development should be located in a lower flood risk zone (flood zone 1).

Further to our concerns about flooding on the site, there is also amenity impacts to consider. The site is located within close proximity to permitted sites which the Environment Agency regulate. Although these sites have permits there is a limit to what measures we can control and ultimately if the site was to go forward it could be impacted by noise and odour for nearby permitted facilities.

Although we do not find the plan unsound on the basis of the safeguarded land policy, if through the examination process the argument is made for this safeguarded land to come forward in this plan period we may wish to change our position as the site is not supported by Sequential and Exceptions Tests.

#### **Spatial Vision and Strategic Priorities**

We support the spatial vision of the plan. It is positive to see that the Sunderland local plan references sustainable development and environment net gain. The Wear estuary has been highlighted an important wildlife corridor in the city. Adopting innovative estuary edges techniques along this corridor would not only enhance habitats but also provides many additional ecosystem services.

Sunderland plan commits to protect natural assets. This could be further strengthened by adopting a natural capital approach, allocating economic value to these important assets. As outlined in the DEFRA 25 year plan.

#### **Policy NE10 Heritage coast policy**

We support policy NE10 and would recommend that the following point is also included within the policy.

- could incorporate estuary edges techniques to soften hard edges and create habitat to enhance coastal ecosystems where opportunities arise.

#### **Policy WWE4 Water Quality**

We fully support this policy and in particular point 4, which we believe will help achieve Water Framework Directive outcomes (WFD) through the plan period.

The Water Framework Directives aim is for all water bodies to be at good status. For many activities in the marine environment approval is needed, before permissions are granted a WFD assessment may be required. 'Clearing the Waters for All' is revised guidance and is for activities in the marine environment up to 1 nautical mile out to sea.

#### **Policy NE1 Green Infrastructure**

We support policy NE1 however would advise that it is re-named "Green and Blue Infrastructure" and referred to throughout the policy and supporting text. Certainly 10.2-10.6 should at least reference Blue Infrastructure.

We would suggest that point 1. iv is amended to the Insert the following at the end of the sentence: apply climate change mitigation and adaptation measures, including flood risk and watercourse management

Further to this we wish to recommend that an additional line is added to point 1 of policy NE1:

ix – protect, enhance and restore watercourses, ponds, lakes and water dependant habitats.

We also wish to advise the following amendment to the supporting paragraphs of policy NE1:

**Paragraph 10.2**

"and in the case of blue space it also includes waterways, lakes, water dependant habitat and the sea." Insert at the end of the sentence.

**Paragraph 10.8**

"Including water-dependent, aquatic and marine habitats and species." Insert at end of first sentence to emphasise the often forgotten water environment.

**Policy NE4 Greenspace**

We would wish to highlight and recommend that the policy also references bluespace in title/text to promote and strengthen the requirement and provision of blue space. This is supported in the Green Infrastructure Strategy and Sustainability Appraisal.

**Policy HS3 Contaminated land**

In general we support the policy HS3 for management of land contamination, however we would like to see the protection of controlled waters specifically referenced in Point 1. If potentially contaminative land uses are identified it is the responsibility of the developer to assess the level of risk posed by the contamination to controlled waters receptors e.g. watercourses, groundwater, lakes and springs. Identified risks posed to controlled waters should be addressed and mitigated/remediated where necessary.

The eastern edge of the South Sunderland Growth Area adjoins the Hallwell Banks Contaminated Land site. This site was inspected by Sunderland City Council under the scope of the Part 2A contaminated land regime. As a result the site was determined as contaminated land by Sunderland City Council in November 2008. Sunderland also designated the site as a Special Site and the Environment Agency became the enforcing authority responsible for requiring its remediation. This work is on-going and should be considered by any development work to be undertaken in the surrounding area.

**Policy WWE2 Flood risk and coastal management**

In general, we support Policy WWE2. In particular we welcome the statements encouraging development towards flood zone 1 and that flood risk is reduced overall.

We would like to see the inclusion that, as per the NPPF, we would not support any development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain)

#### **Policy WWE3 Water Management**

We support the policy Inclusions listed in WWE3 and 4 in Chapter 11 in relation to developments with a SuDS component. If SuDS are to be incorporated into any or all of the proposed developments we request that the suitability of the final drainage scheme is taken into consideration. Care should be taken to ensure that any SuDS which speed up infiltration to ground will not encourage leaching of pollutants into the groundwater aquifer.

Paragraph 11.23 recommends a hydrogeological risk assessment be made – this does not have to be a full and separate document but be included within an FRA or EIA as a groundwater risk assessment component.

Paragraph 11.25 recommends early engagement and we support this; suggest the assessment is proportionate based on the level of concern now and in the future i.e. long term monitoring, and operational management.

#### **WWE5 Disposal of foul water**

We support this policy as far as it goes. We would recommend that the policy also covers the requirement for any development proposing to discharge trade effluents, such as a car wash development to provide a water management plan.

Furthermore, all proposed drainage schemes, for both foul and surface water discharges, should be appropriate in their chosen location to avoid potential flooding events. We would recommend that all foul and surface water drainage be directed to main sewer where possible. An assessment of the suitability of any non mains drainage schemes is likely to be required. For example, consideration should be given by the developer when designing infiltration based SuDS as to whether the ground in the chosen location has capacity to absorb any excess water from the proposed schemes both now and in the future.

A number of the growth areas are underlain by the Magnesian Limestone principal aquifer with large areas located within currently designated groundwater Source Protection Zones (please note any reference throughout the document to ground source protection zones are in fact groundwater protection zones). The Magnesian Limestone aquifer is a highly sensitive environmental receptor and is an important source of water for a large number of public, private and industrial supplies.

Whilst policies WWE3, WWE4 and WWE5 will all prevail for these areas we request that as part of any new development proposal within the growth area, risks from the proposed (future) use of the site to the underlying groundwater are assessed and addressed to ensure that the development is acceptable. If potentially polluting materials are to be used/stored either during redevelopment works or as part of the new land use i.e. use of tanks to store chemicals/fuels then we would expect sufficient pollution prevention measures, including maintenance of measures, to be incorporated in to the development proposals.

#### **Policy SP11 Mineral Extraction**

In general we support policies relating to mineral extraction and safeguarding. Flooding risks highlighted in SP11 should also include potential risks from groundwater flooding. Policy should include dewatering which is no longer an exempt activity and water

management plans may be required to protect water quality and resource particularly within the 5km of the coast.

It should also be noted that on page 142 where the limestone is defined the name should be Magnesian not magnesium.

**Policy BH2 Sustainable design and construction**

We would like to see the inclusion that Policy BH2 is delivered in accordance with Policy WWE2 and WWE3.

**Policy WWE2 Flood risk and coastal management**

In general, we support Policy WWE2. In particular we welcome the statements encouraging development towards flood zone 1 and that flood risk is reduced overall. We would like to see the inclusion that, as per the NPPF, we would not support any development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain)

**Sunderland Green Infrastructure Strategy Framework**

We support the Sunderland Green Infrastructure and feel it has been positively prepared and have the following further recommendations to make:

**Paragraph 3.1.2 Existing Data**

We wish to advise that the Environment Agency holds information on WFD of all waterbodies within Sunderland. This information can be found online and is called the Catchment Data Explorer.

**Paragraph 2.2.9 – 25 Year Environment Plan**

Embed an 'environmental net gain' principle for development, including housing and infrastructure.

Current policy is that the planning system should provide biodiversity net gains where possible. We will explore strengthening this requirement for planning authorities to ensure environmental net gains across their areas, and will consult on making this mandatory – including any exemptions that may be necessary. This will enable those authorities to develop locally-led strategies to enhance the natural environment, creating greater certainty and consistency and avoiding increased burdens on developers, including those pursuing small-scale developments. We would expect this should have a net positive impact on overall development.

If you would like to discuss this letter with me further please feel free to contact me on the information provided below.

Yours Sincerely,

**James Hudson**  
Senior Planning Advisor

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19 December 2018

For the attention of Louise Sloan

Dear Louise,

## **SUNDERLAND LOCAL PLAN INFRASTRUCTURE STUDY**

Highways England have worked in partnership with Sunderland City Council, over a number of years, to identify suitable schemes to mitigate the impacts of the Sunderland Local Plan (Local Plan) and placed substantial investment in the development of possible improvement options within Sunderland, including an update and extension to our A19T&W Aimsun model for this purpose.

Further to final agreement on the sites to be included in your Local Plan running to 2033, we have now assessed the cumulative impact of those developments on the strategic road network (SRN) in our Aimsun mesoscopic model of the A19.

### **Overview of sites and methodology**

In common with our standard methodology for assessing local plans, we removed any sites with a yield of less than 30 dwellings and employment sites with a site area of less than 0.3ha. As agreed with you, a site area of 150ha, in accordance with the Area Action Plan, was assessed for the IAMP site.

As with previous assessments, vehicular trips for each of the sites were generated and distributed onto the road network using our GraHAM tool. This tool utilises 2011 Census Journey to Work data to determine the location of employment for people who live in a particular ward and the location of housing for people who work in a particular ward. The assignment of trips is undertaken through a quickest route algorithm, with reference to the free flow speed (which depends upon the road class). Double counting of trips between housing and employment sites was accounted for by including all trips generated by new housing developments in Sunderland, but netting off all trips to employment sites which originated from within the district (therefore only including trips to employment sites from outside of Sunderland).

Using data provided by Capita (which consisted of 2020 'with' and 'without' the bridge outputs from SATURN), we adjusted our future year traffic flows to account for the New Wear crossing which opened earlier this year.



Our modelling of 2028 and 2033 scenarios includes all of the access infrastructure for the IAMP site adjacent to the Downhill Lane junction, including the proposed new bridge over the A19. However, this bridge was not included in the Capita assessments of the New Wear Crossing as it will not be delivered by 2020.

Other committed schemes included in all scenarios were:

- Testos junction major scheme (details on Highways England website)
- Downhill Lane junction major scheme (details on Highways England website)
- Doxford Park junction interim scheme (widening of A19 southbound off slip, City Way westbound, A690 eastbound and localised widening of north eastern and north western circulatory carriageways)

### **Modelling results - no additional schemes on SRN**

Using the phasing information provided by you, we have now undertaken 2033 (plan end year) and 2028 (10 year) assessments, without the addition of any further mitigation schemes, to understand the impacts of the Local Plan on the SRN.

The 2033 assessments showed very severe impacts on the A19 in the morning peak. On the A19 northbound, there is a severe queue between the Wessington Way junction and the Seaton Lane junction with travel times between the Doxford Park diverge and the Chester Road merge predicted to be over 10 times the free flow travel time. This means that a journey between the Doxford Park junction and the Chester Road junction that would normally take approximately 90 seconds could take up to 15 minutes. This problem is accompanied by further severe delays on the southbound approach to the Wessington Way and Doxford Park junctions in the morning peak. In the evening peak, there is a severe queue northbound between the Chester Road and Wessington Way junctions.

The 2028 assessments also showed severe impacts on the A19 in the morning peak. The queues were in the same places as the 2033 scenario (namely northbound between the Wessington Way and Doxford Park junctions and on the southbound approaches to the Wessington Way and Doxford Park junctions), though the queues were slightly less severe than the 2033 scenario.

### **Modelling results – with mitigation**

We have therefore tested the Local Plan impacts in 2028 with the inclusion of the following package of measures, which we have developed through this process:

- Wessington Way junction – A19 southbound lane gain, widen to 3 lanes in each direction on Wessington Way East, signalise Ferryboat Lane junction and change lane designations, change to lane designations on northbound off slip
- Chester Road to Doxford Park – A19 north and southbound lane gain / lane drop
- Doxford Park junction – Segregated left turn from A690 west to A19 north

The results show that with these measures in place, queues on the SRN are reduced to a slight delay around the Chester Road junction in the morning peak and a slight delay

on the northbound approach to the Wessington Way junction in the evening peak. Model outputs of these assessments are provided as an appendix to this letter.

### **Conclusion**

Due to the scale of the development proposed as part of the Sunderland Local Plan, further work is required to establish the schemes or other mitigating measures such as the imposition of a Highway Operational Management Plan, to control shift patterns at the International Advance Manufacturing Park, needed to mitigate the full impact of the plan to 2033.

However, we have now identified a number of schemes which will mitigate the impact of the plan to 2028, namely:

- Wessington Way junction – A19 southbound lane gain, widen to 3 lanes in each direction on Wessington Way East, signalise Ferryboat Lane junction and change lane designations, change to lane designations on northbound off slip
- Chester Road to Doxford Park – A19 north and southbound lane gain / lane drop
- Doxford Park junction – Segregated left turn from A690 west to A19 north

We would also support the continued delivery of the Sunderland Strategic Transport Corridor (SSTC), in particular phase 4, in order to control and manage traffic flow on the local road network in the vicinity of the Wessington Way junction, with the intention of helping to better manage traffic flow on the SRN.

On this basis, we can now remove our objection to the Local Plan on condition that an approach is identified and agreed to develop suitable mitigation for the full plan period to 2033, in addition to a delivery plan outlining when each measure is required within the plan period. We will continue to work with you to develop a Memorandum of Understanding (MOU) between Highways England and Sunderland City Council outlining this approach and to identify suitable mitigation to reduce the impact of the plan on the SRN to 2033.

I trust this information is helpful, however should you require any further information, please do not hesitate to contact me.

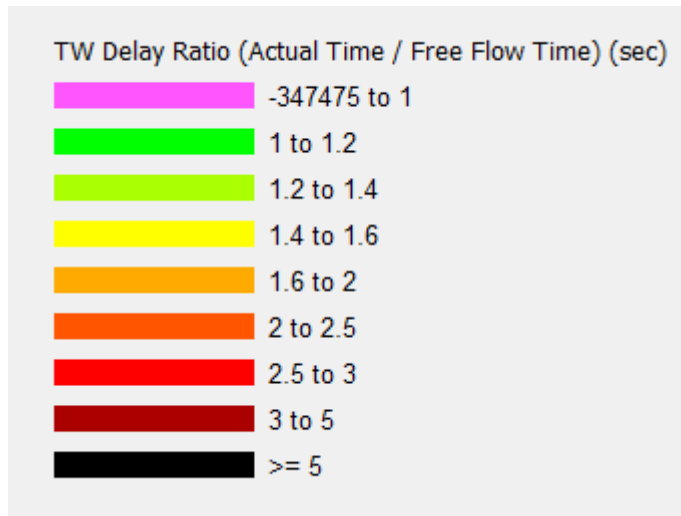
Yours sincerely



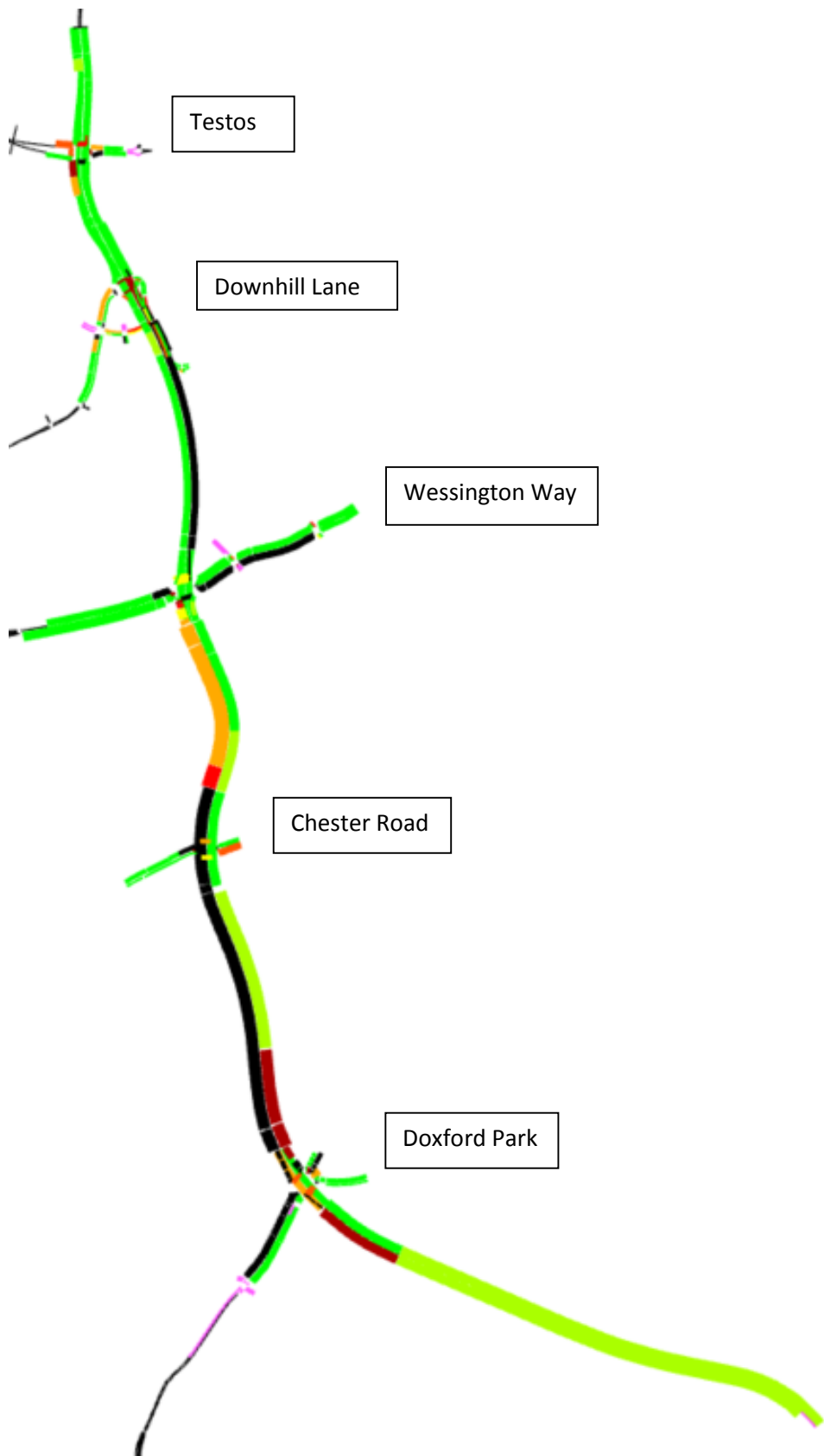
Mark Goodwill  
Spatial Planning Manager  
Yorkshire & North East  
Email: [mark.goodwill@highwaysengland.co.uk](mailto:mark.goodwill@highwaysengland.co.uk)

## 2028 Without Mitigation Model Outputs

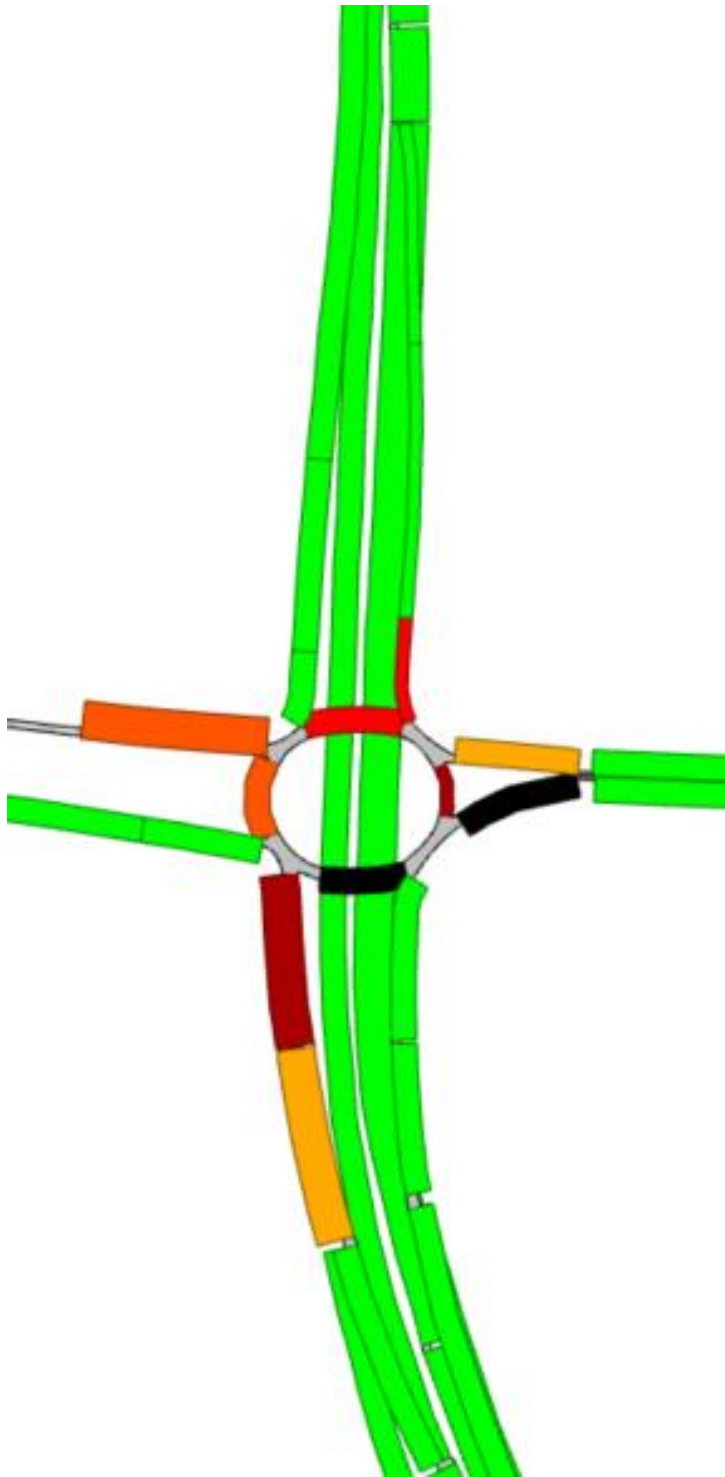
Legend:



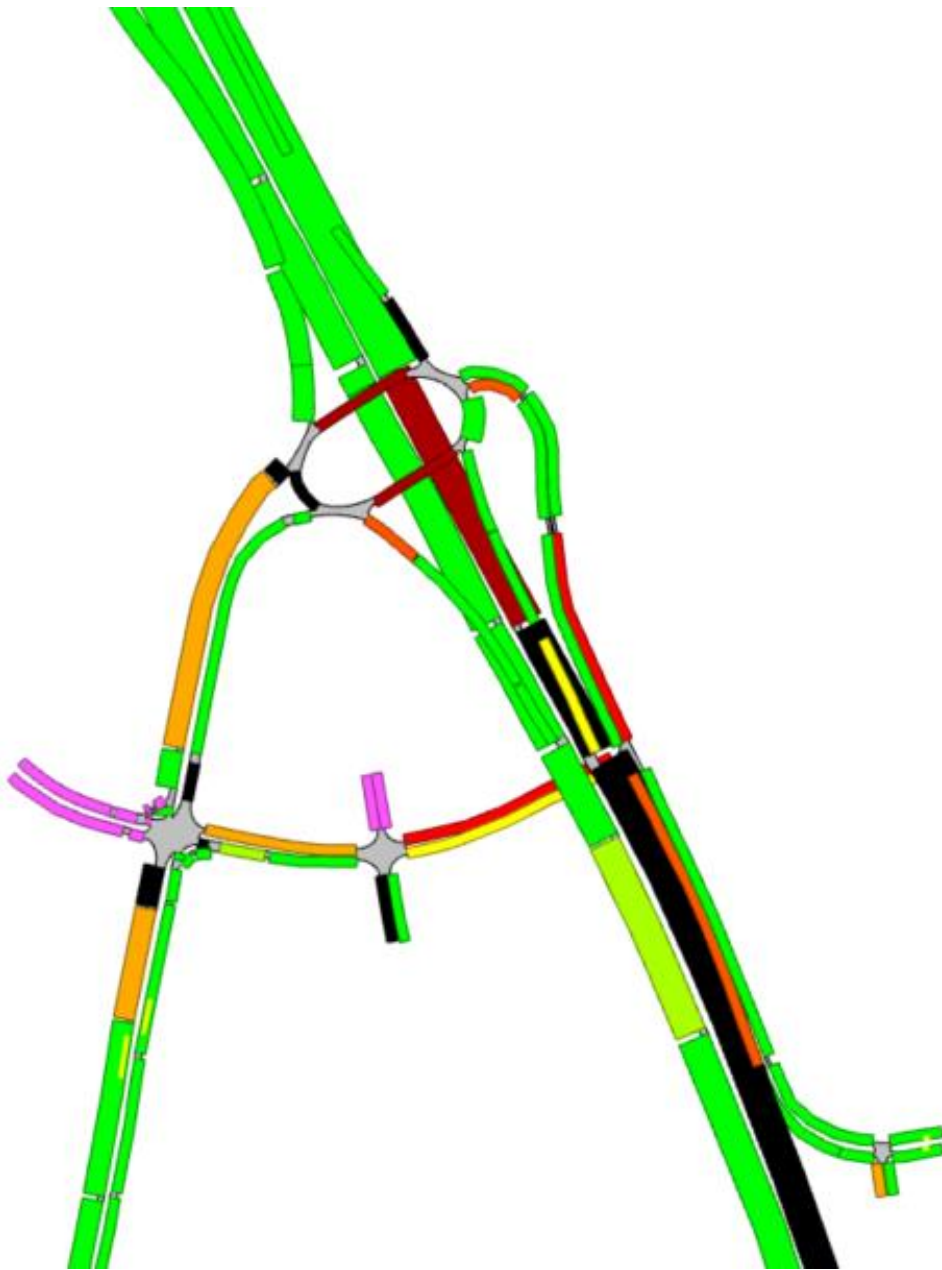
Morning Peak: Whole Network



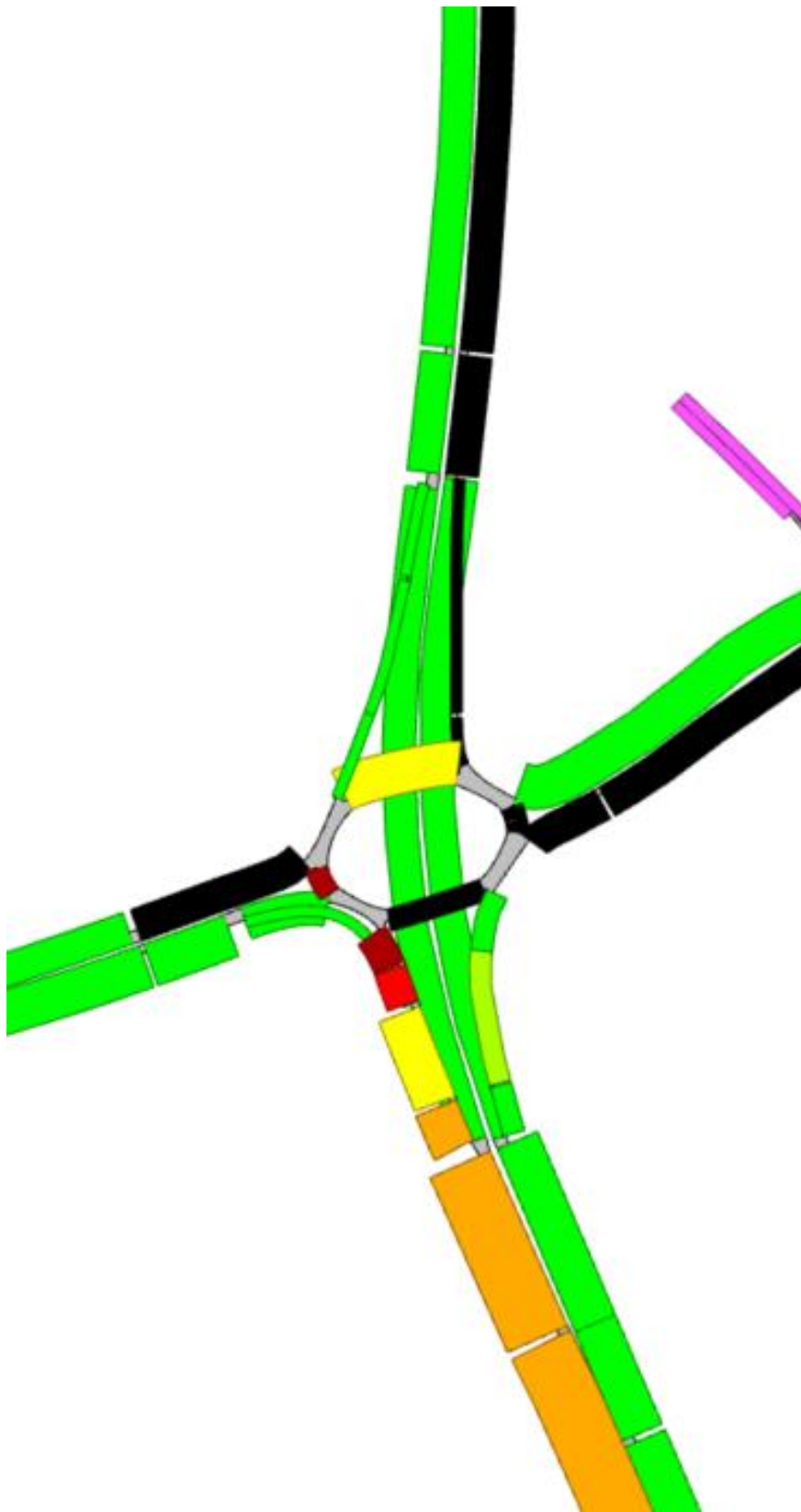
Morning Peak: Testos



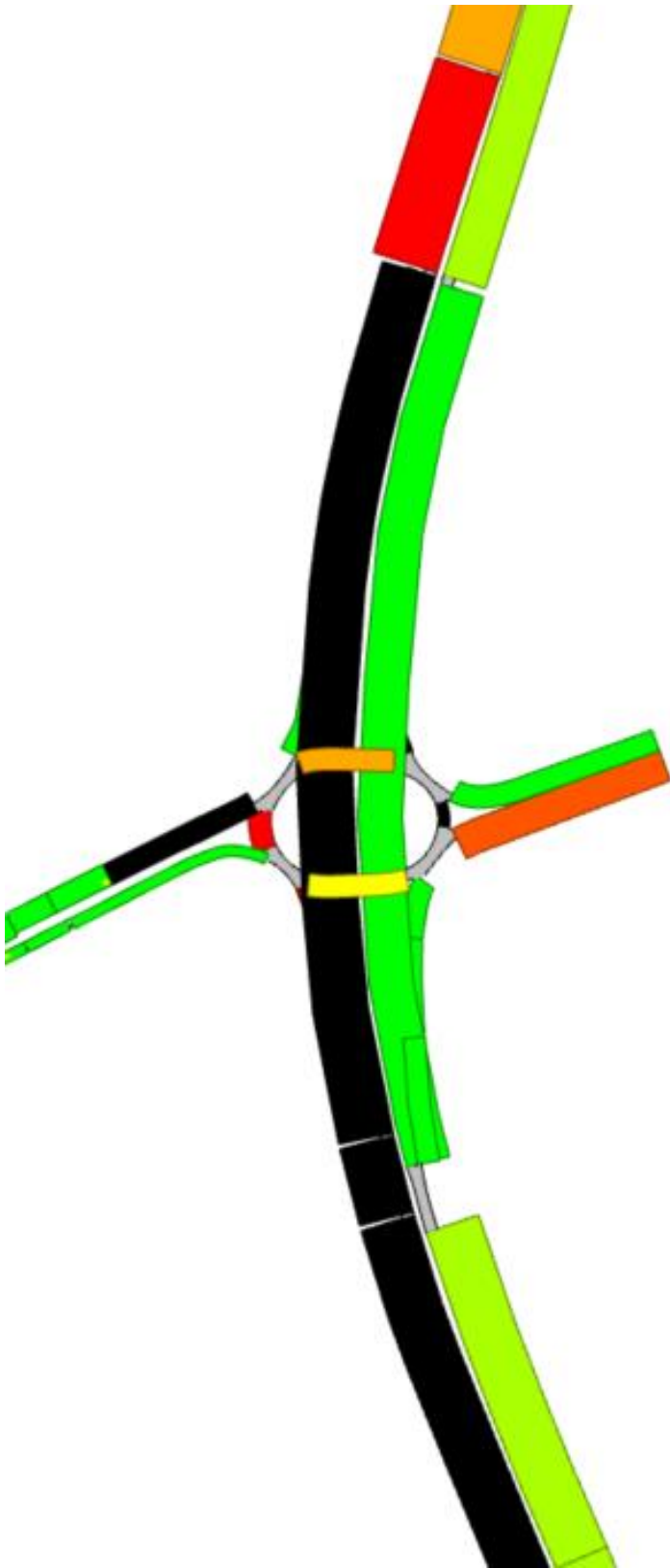
Morning Peak: Downhill Lane



Morning Peak: Wessington Way

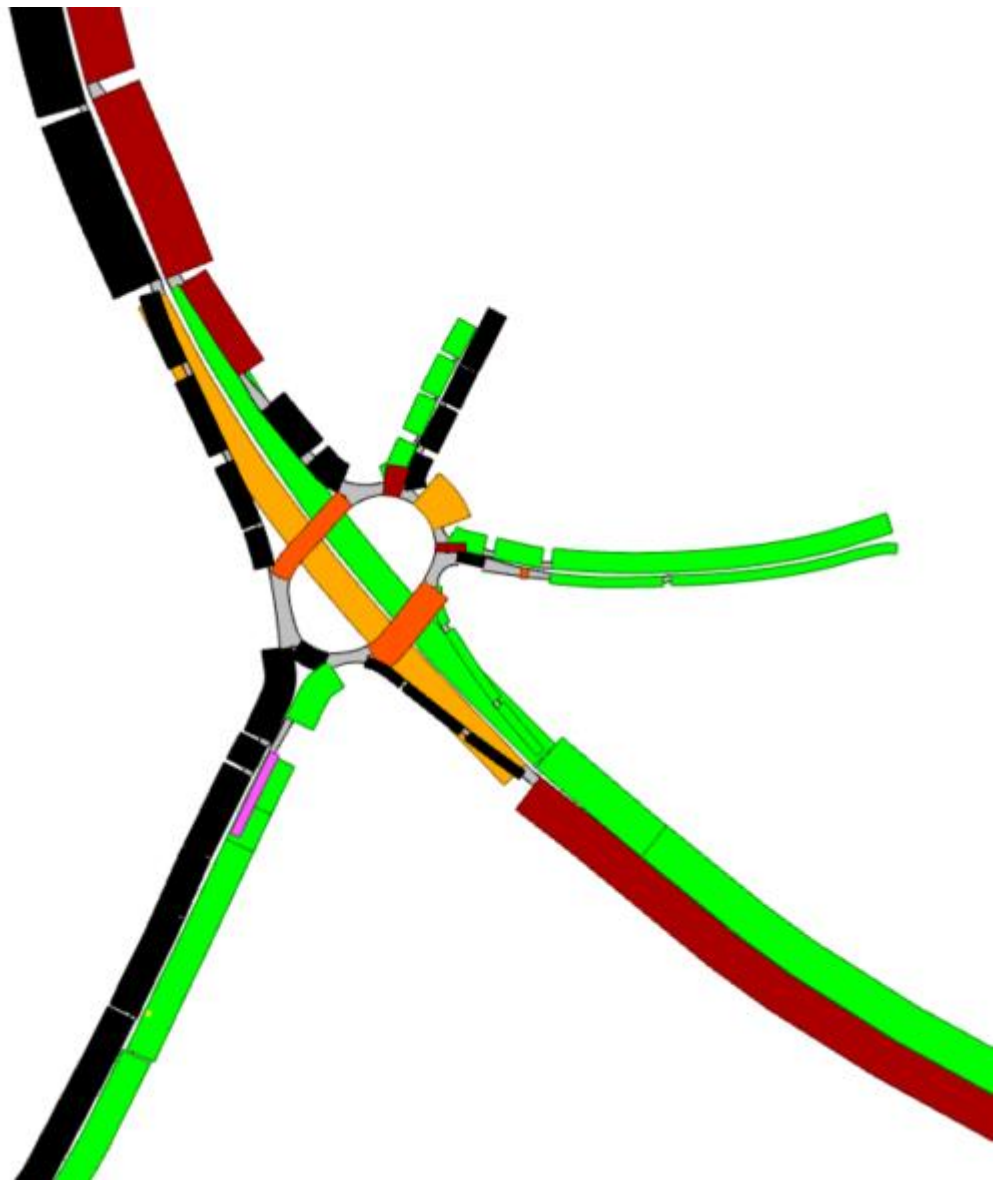


Morning Peak: Chester Road

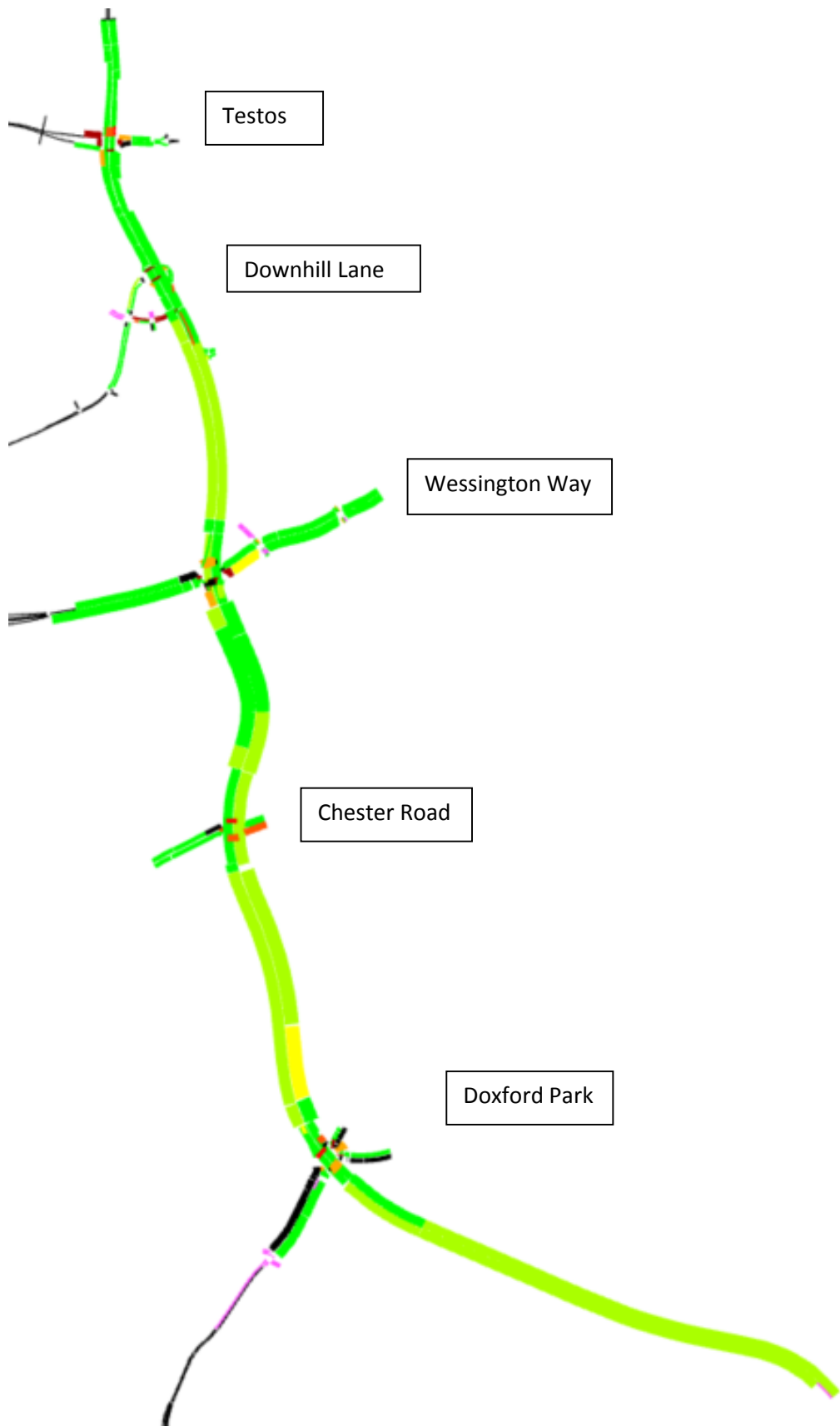




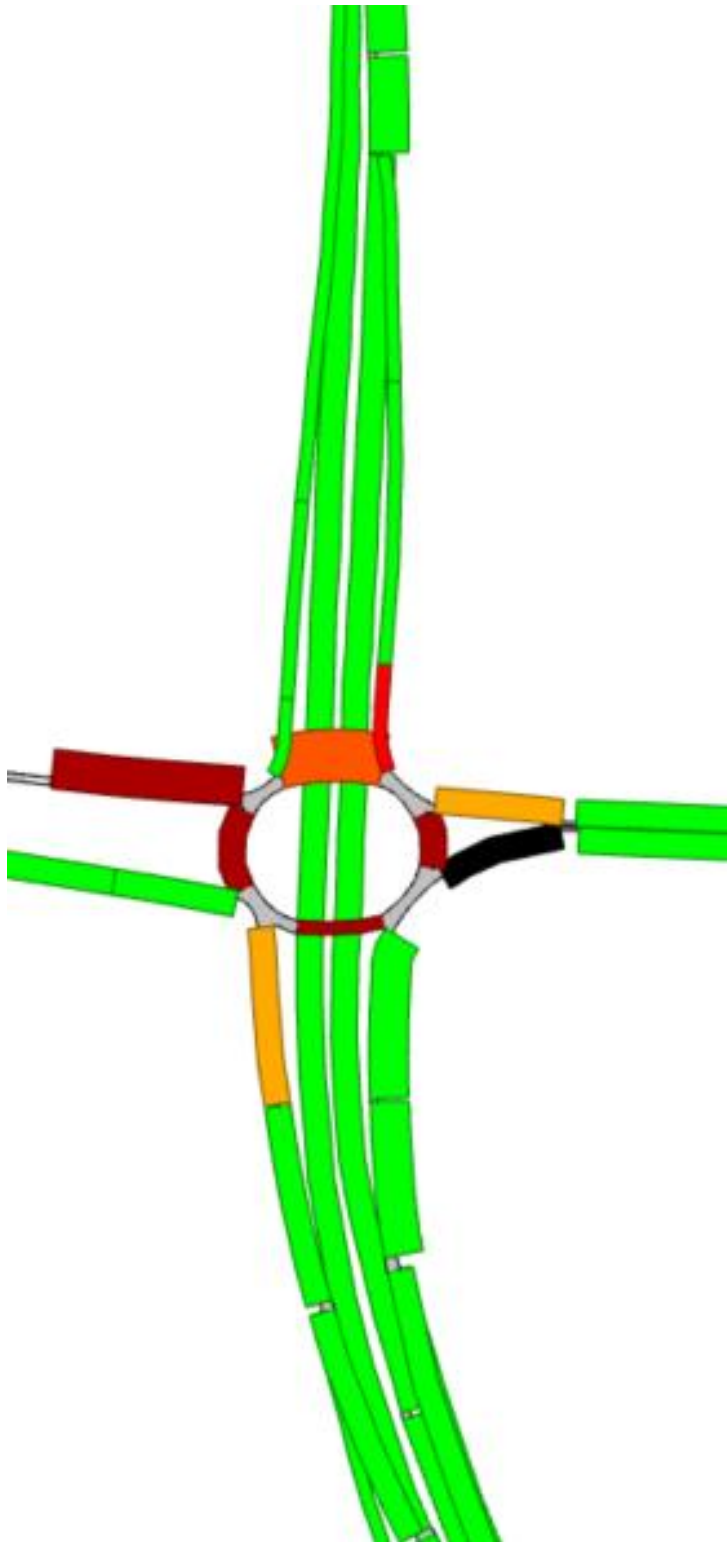
Morning Peak: Doxford Park



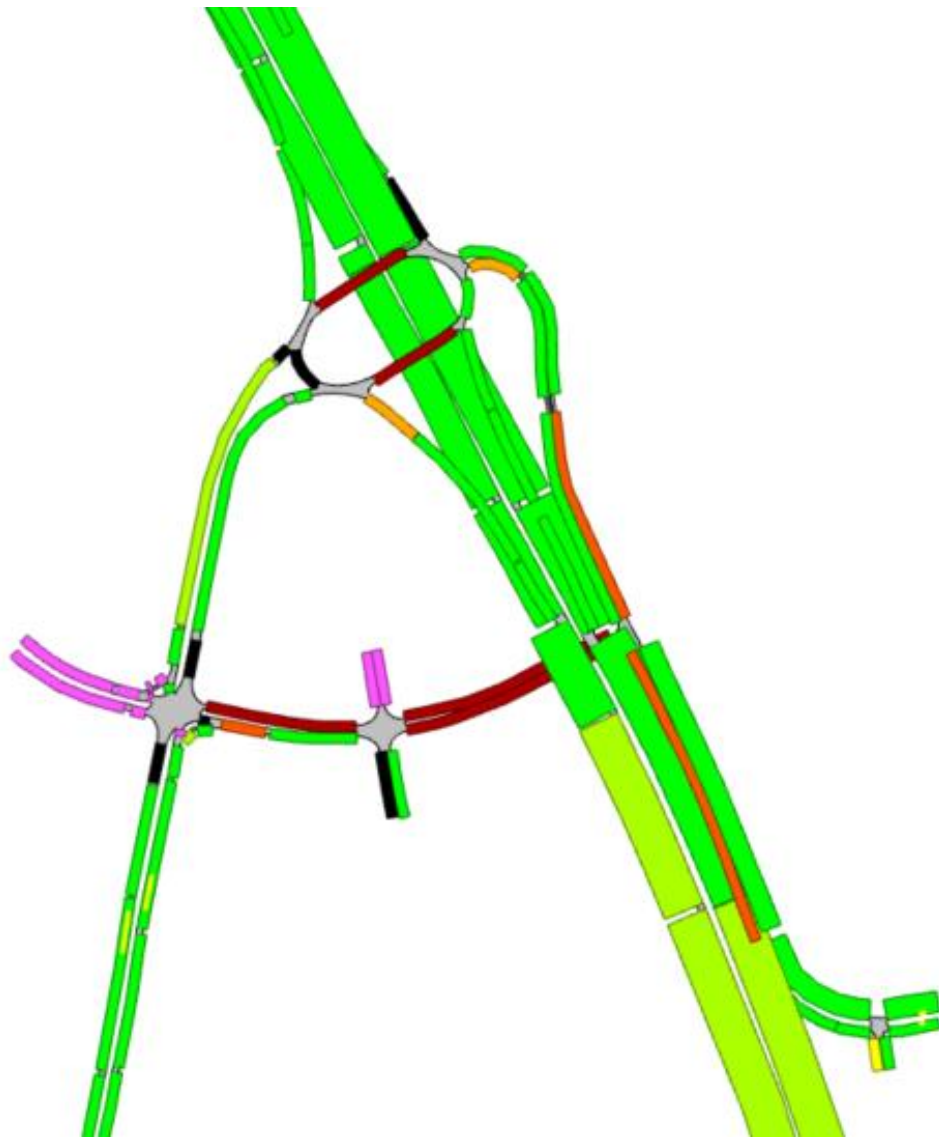
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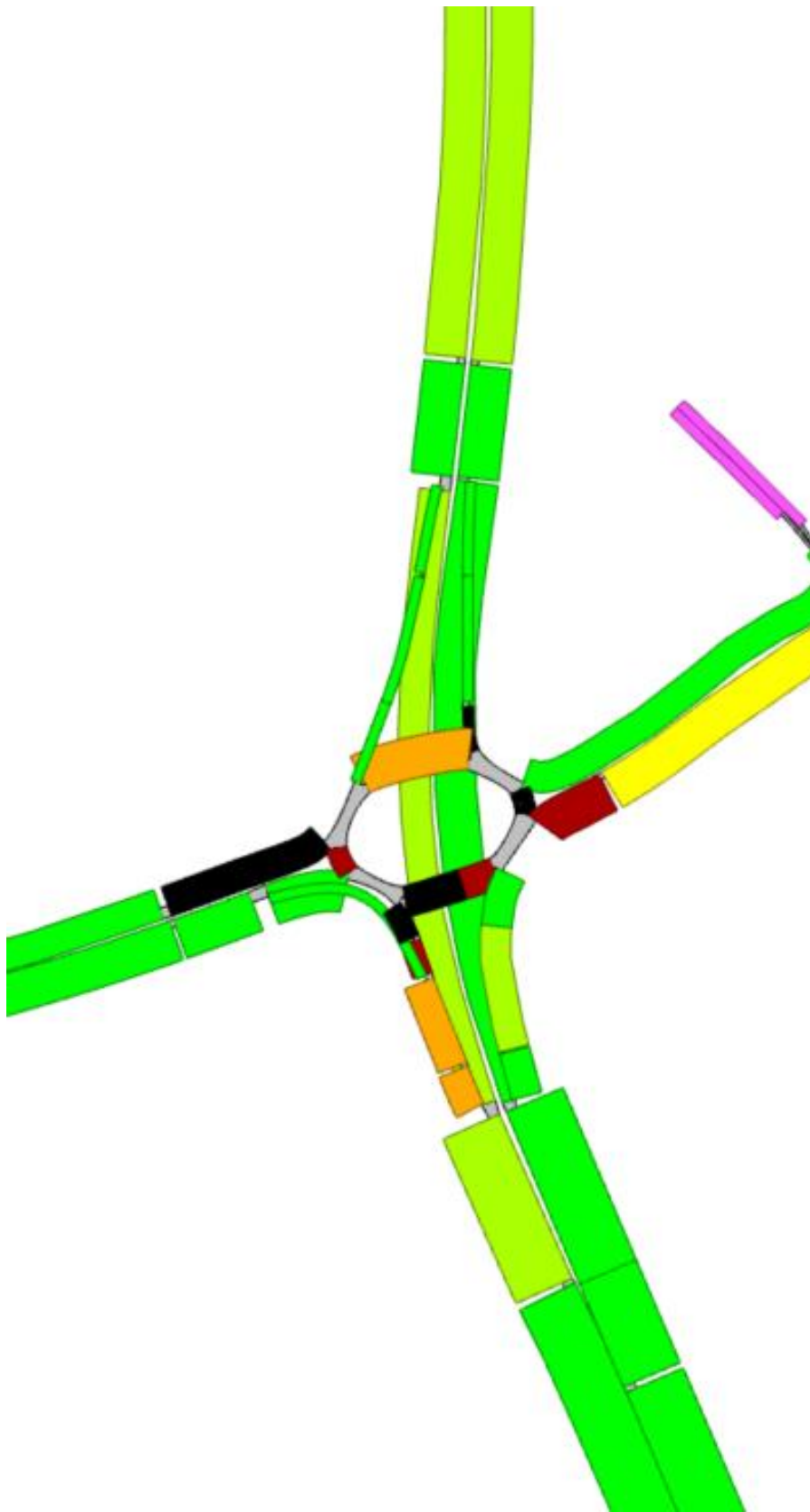
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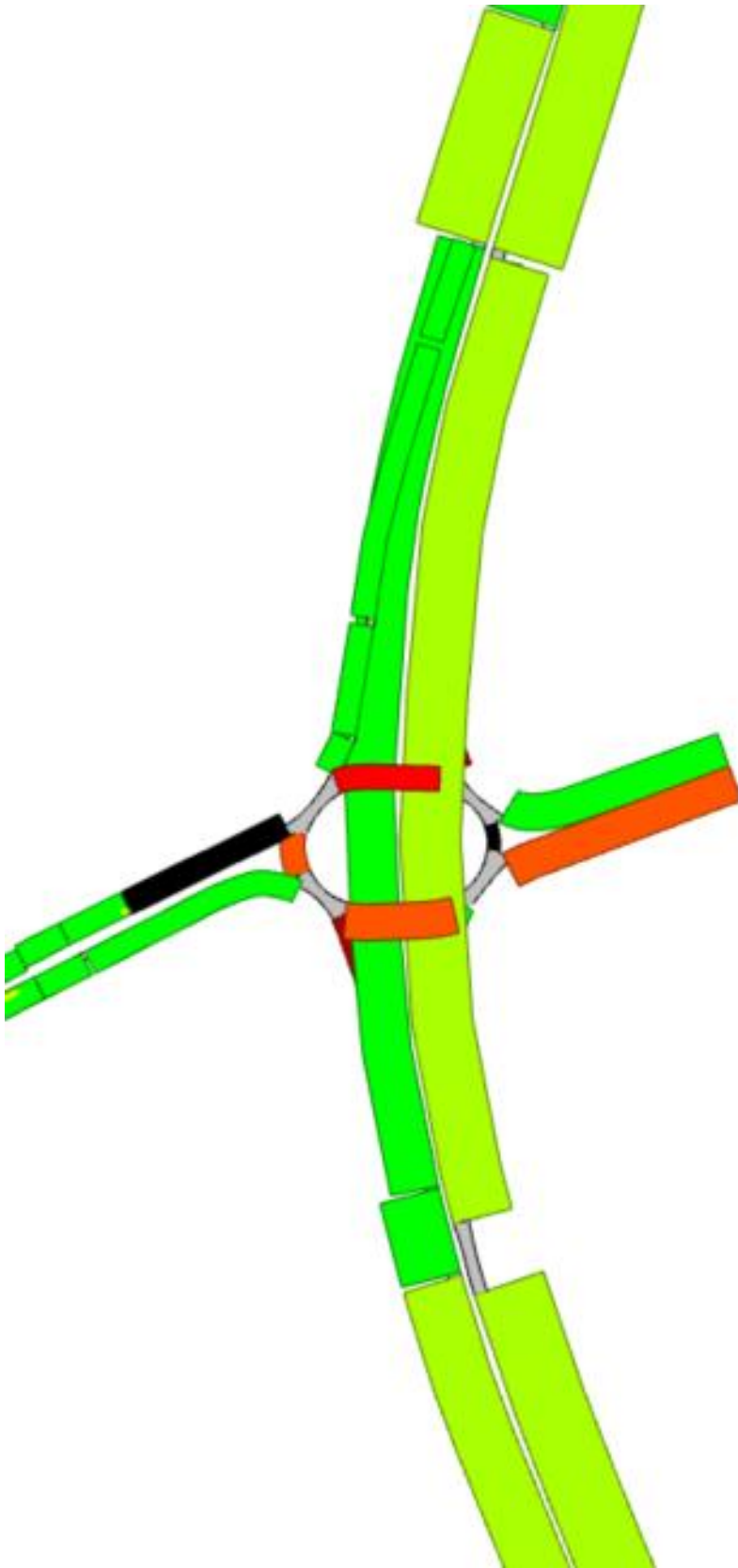
Evening Peak: Downhill Lane



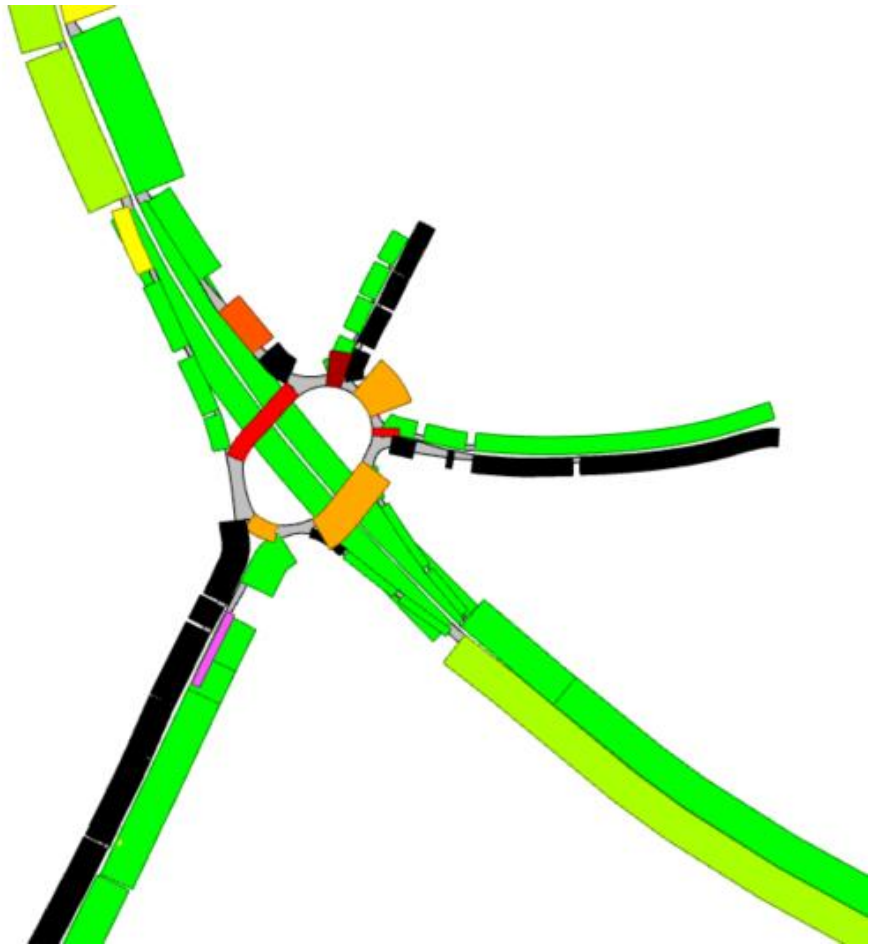
Evening Peak: Wessington Way



Evening Peak: Chester Road

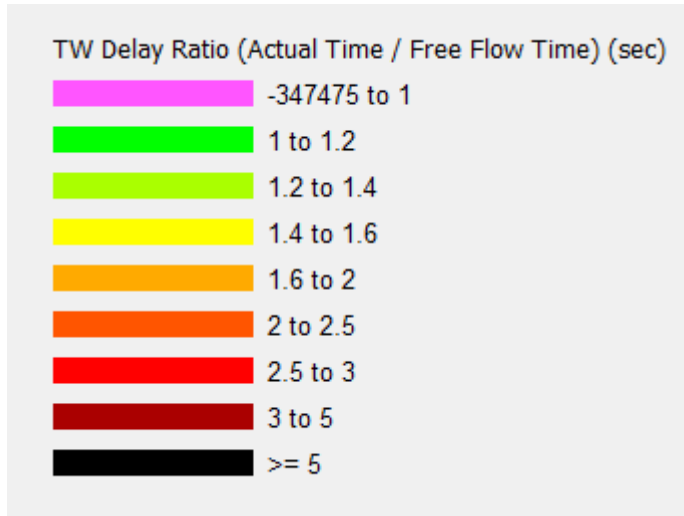


Evening Peak: Doxford Park



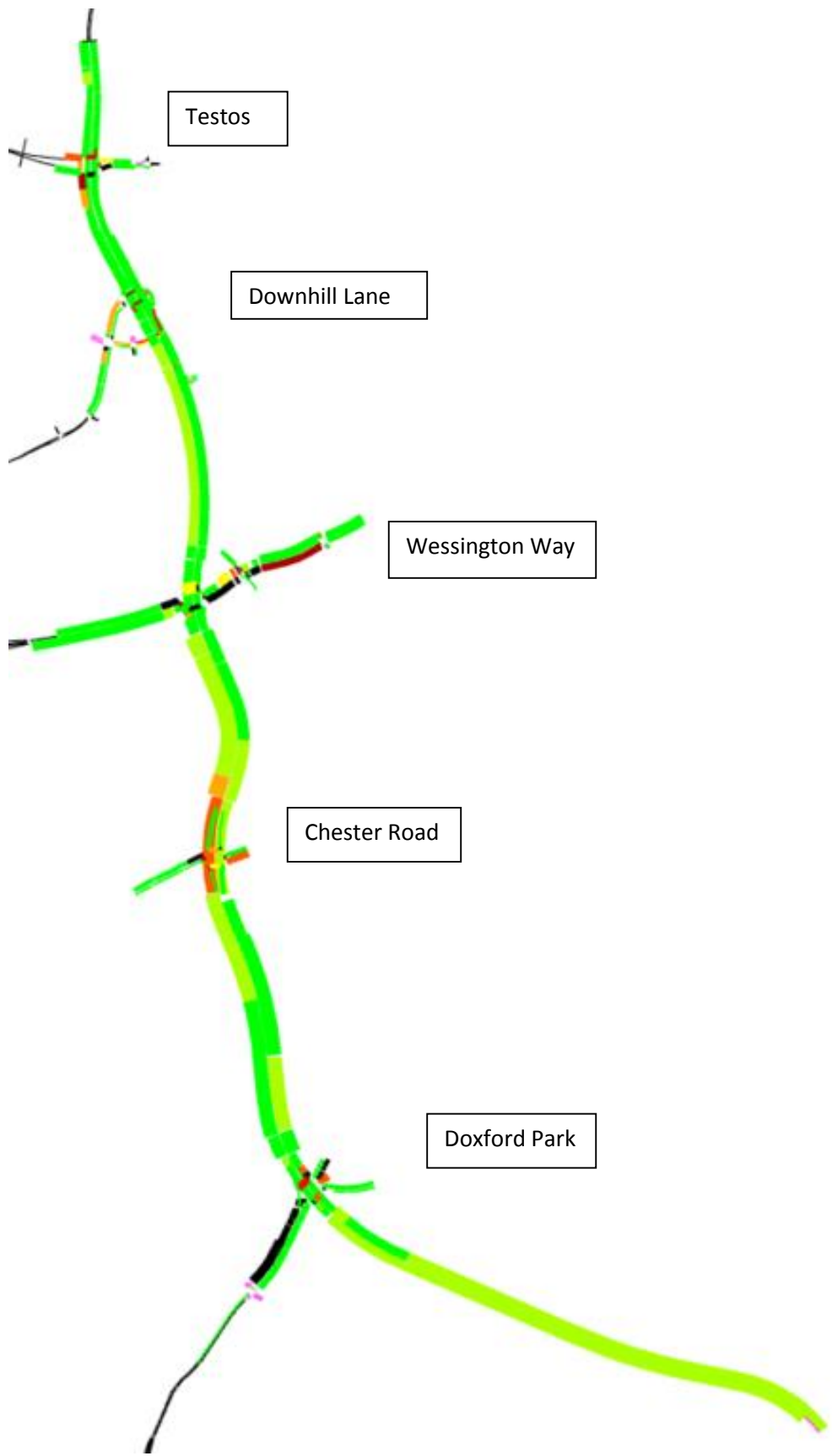
## 2028 With Mitigation Model Outputs

Legend:

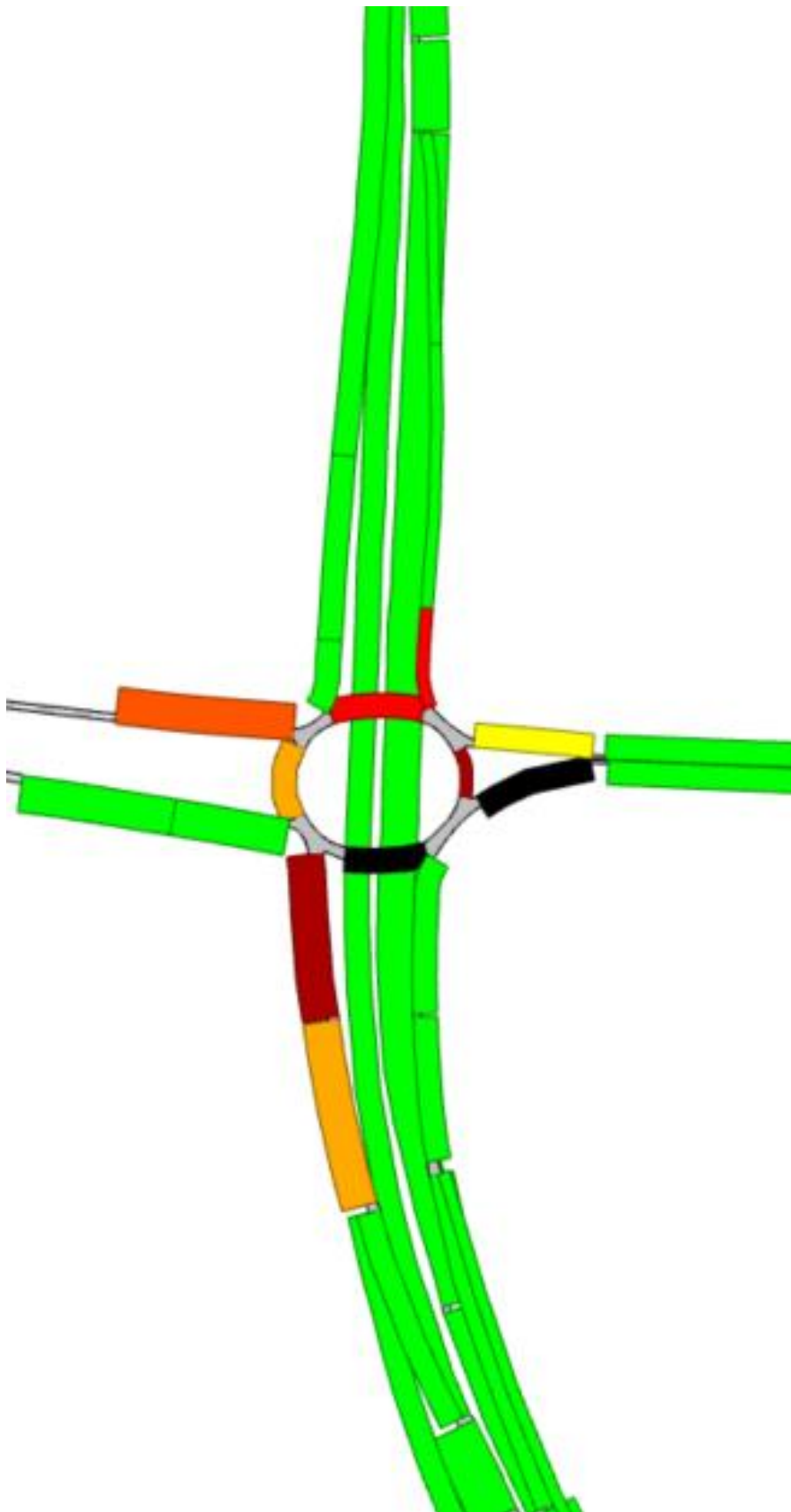




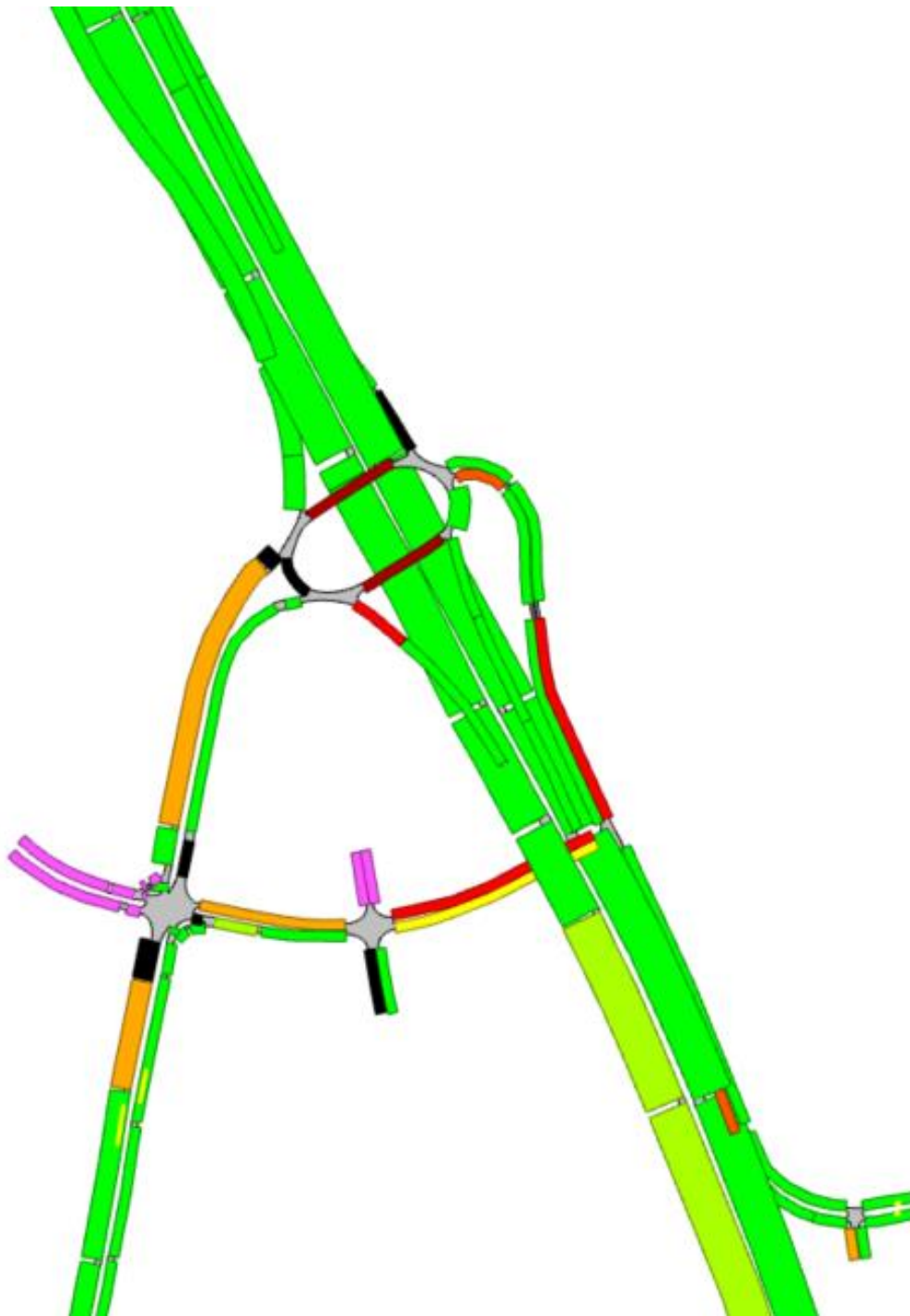
Morning Peak: Whole Network



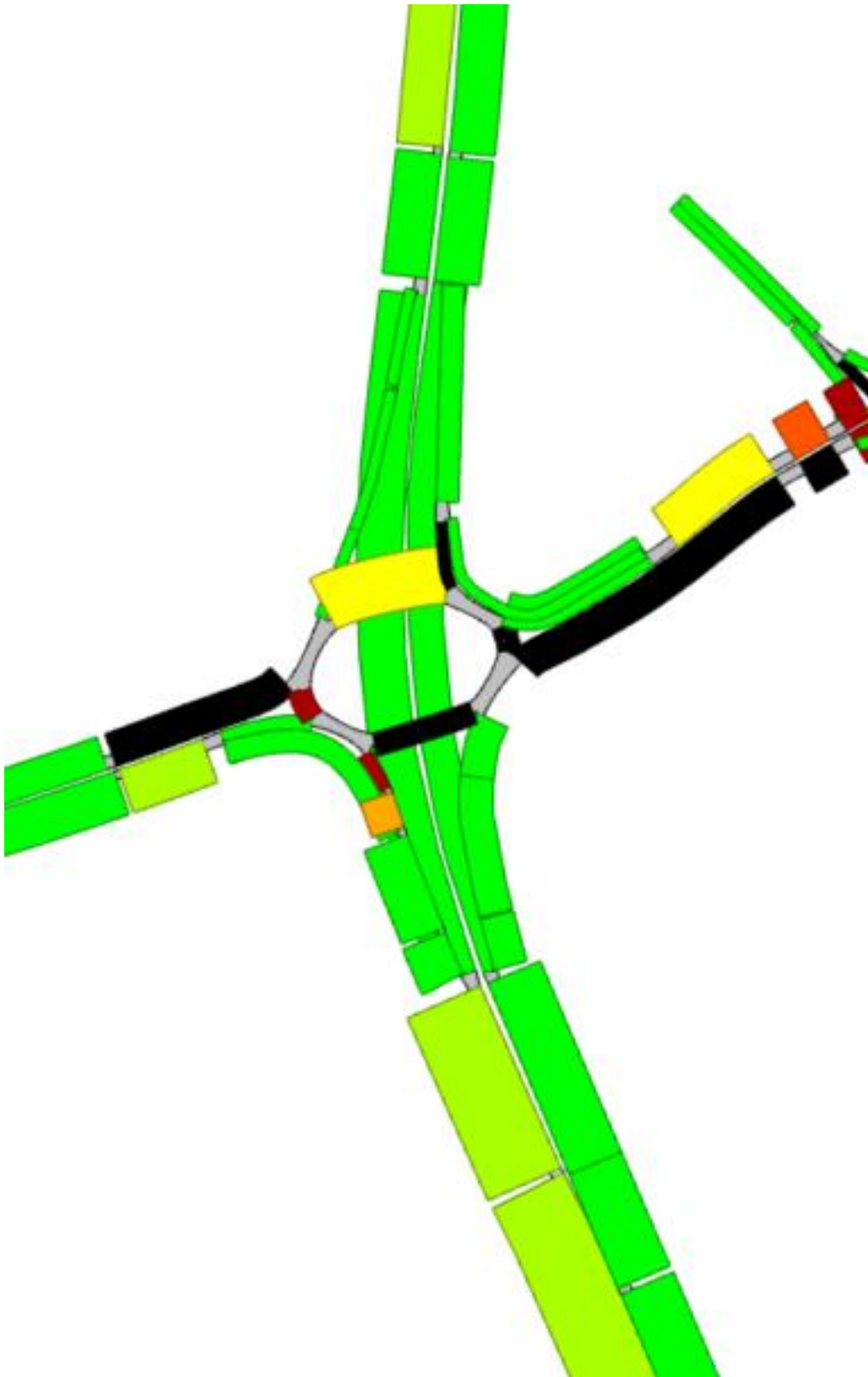
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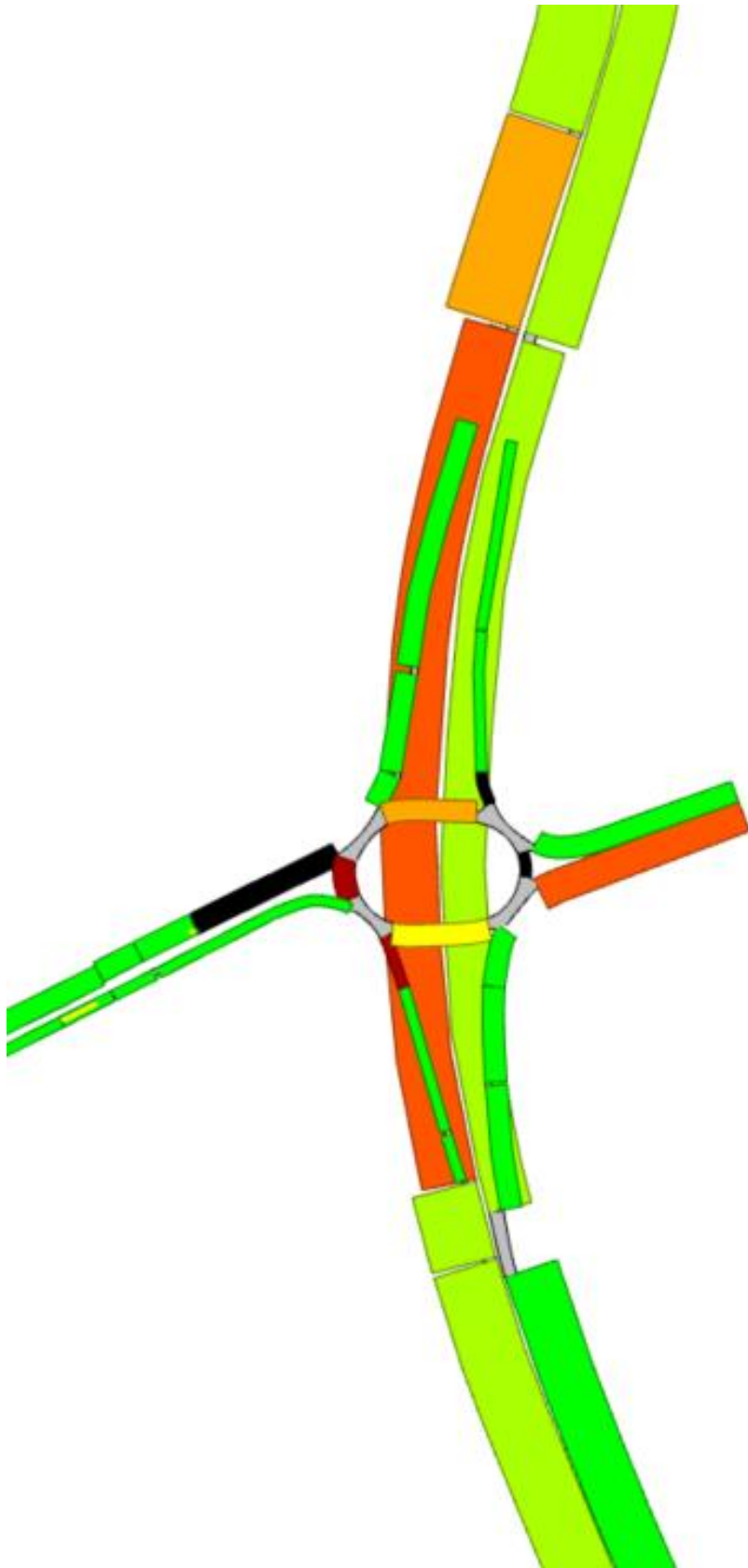
Morning Peak: Downhill Lane



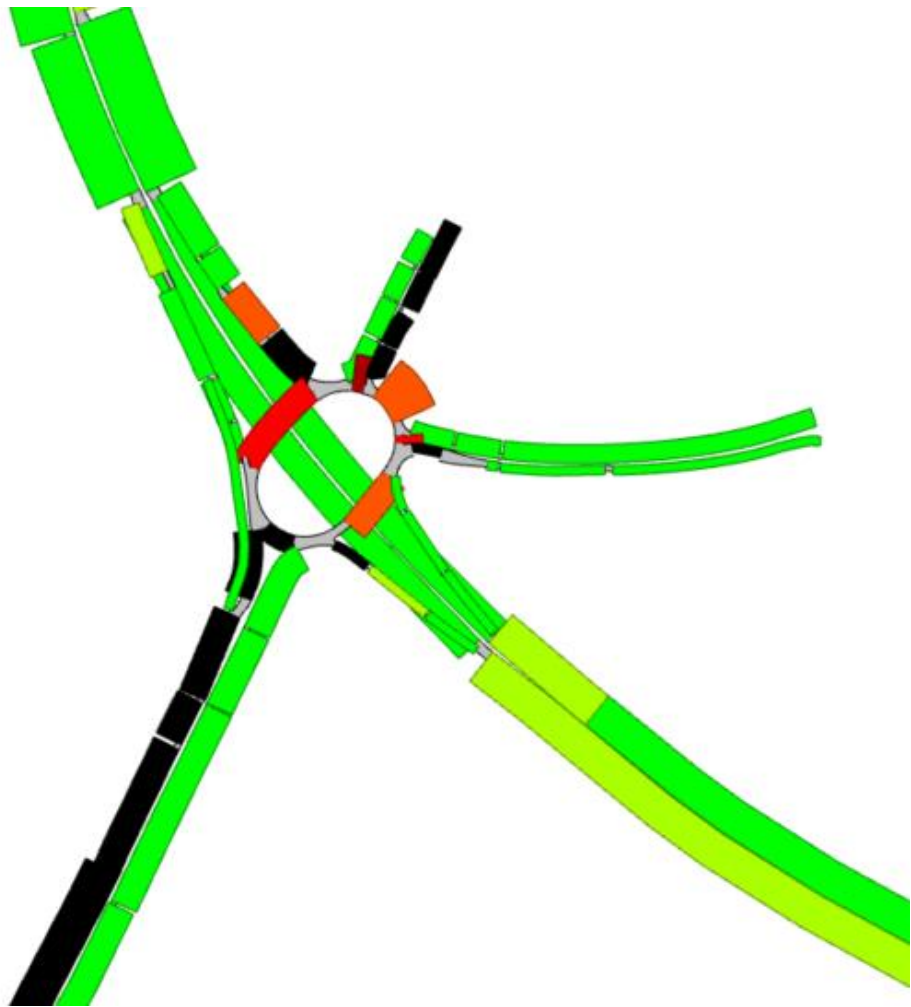
Morning Peak: Wessington Way



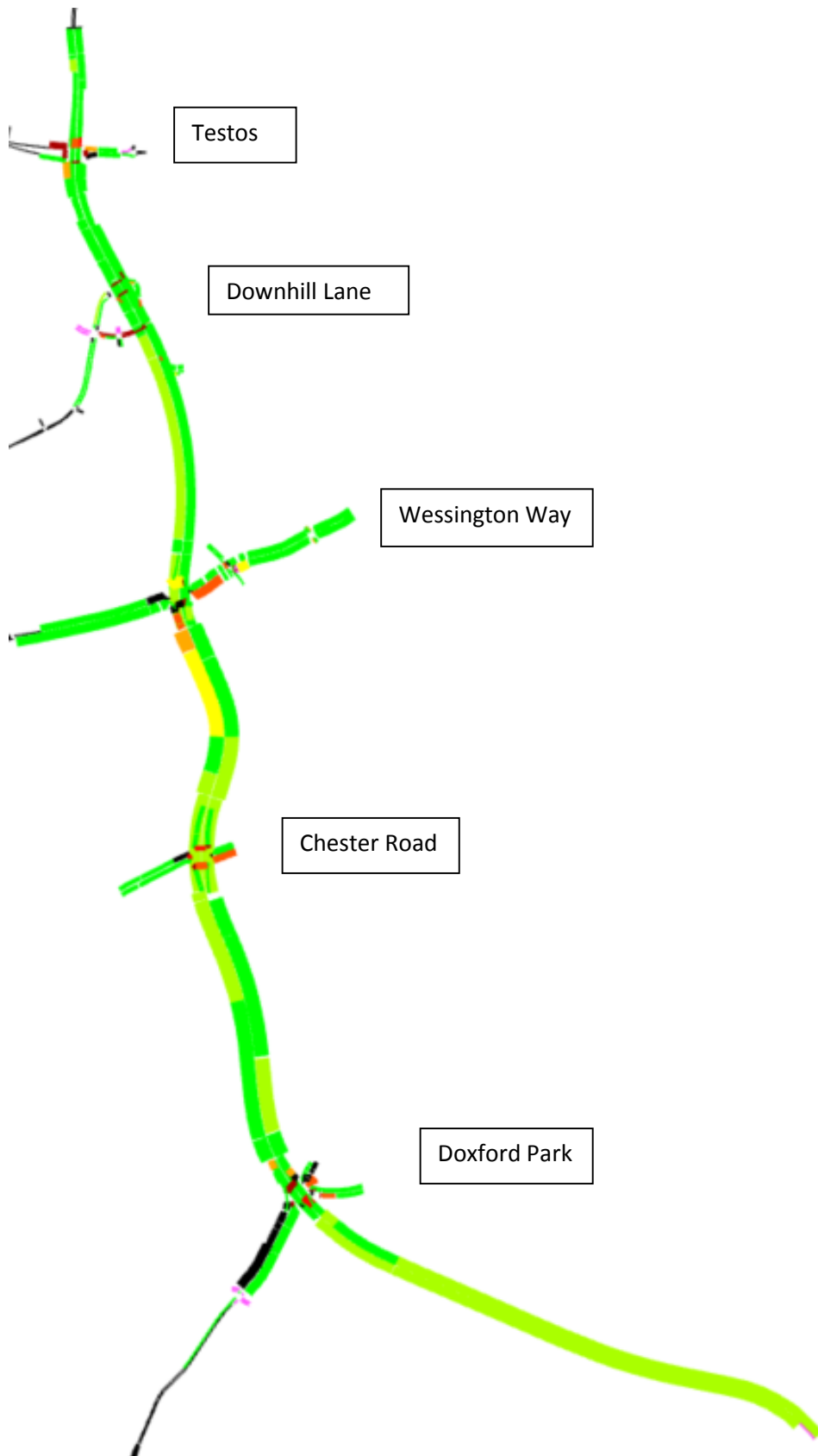
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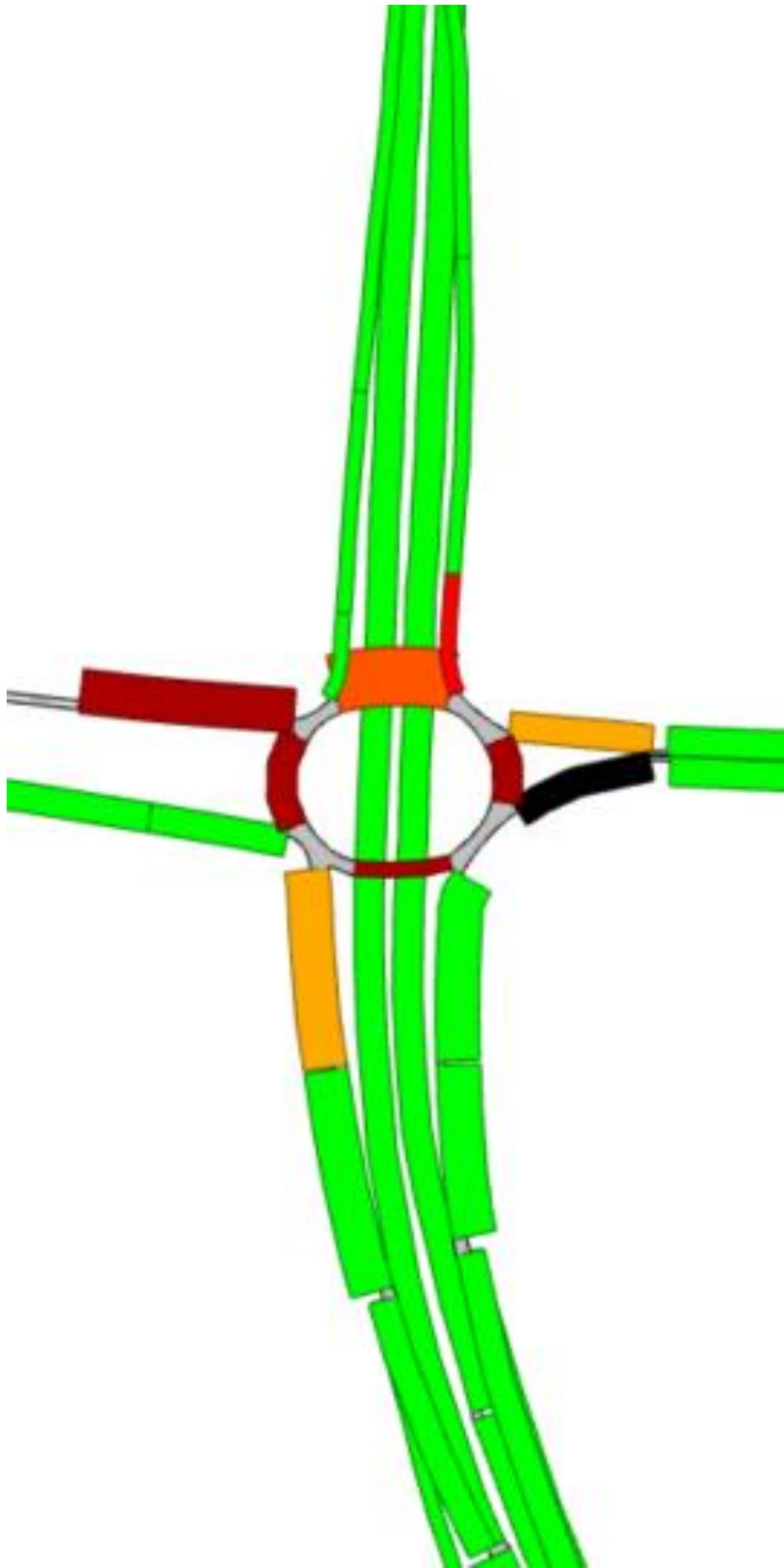
Morning Peak: Doxford Park



Evening Peak: Whole Network



Evening Peak: Testos

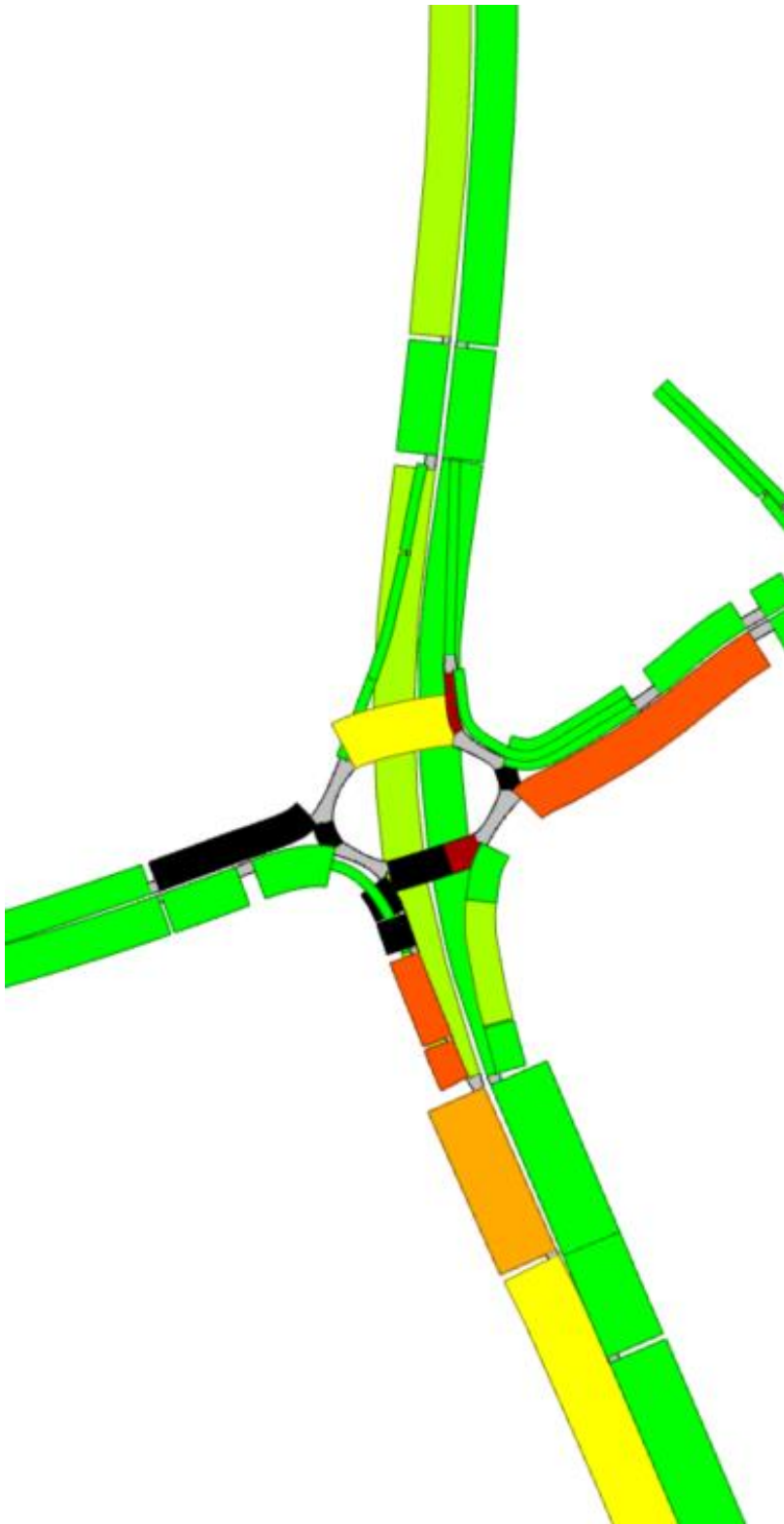




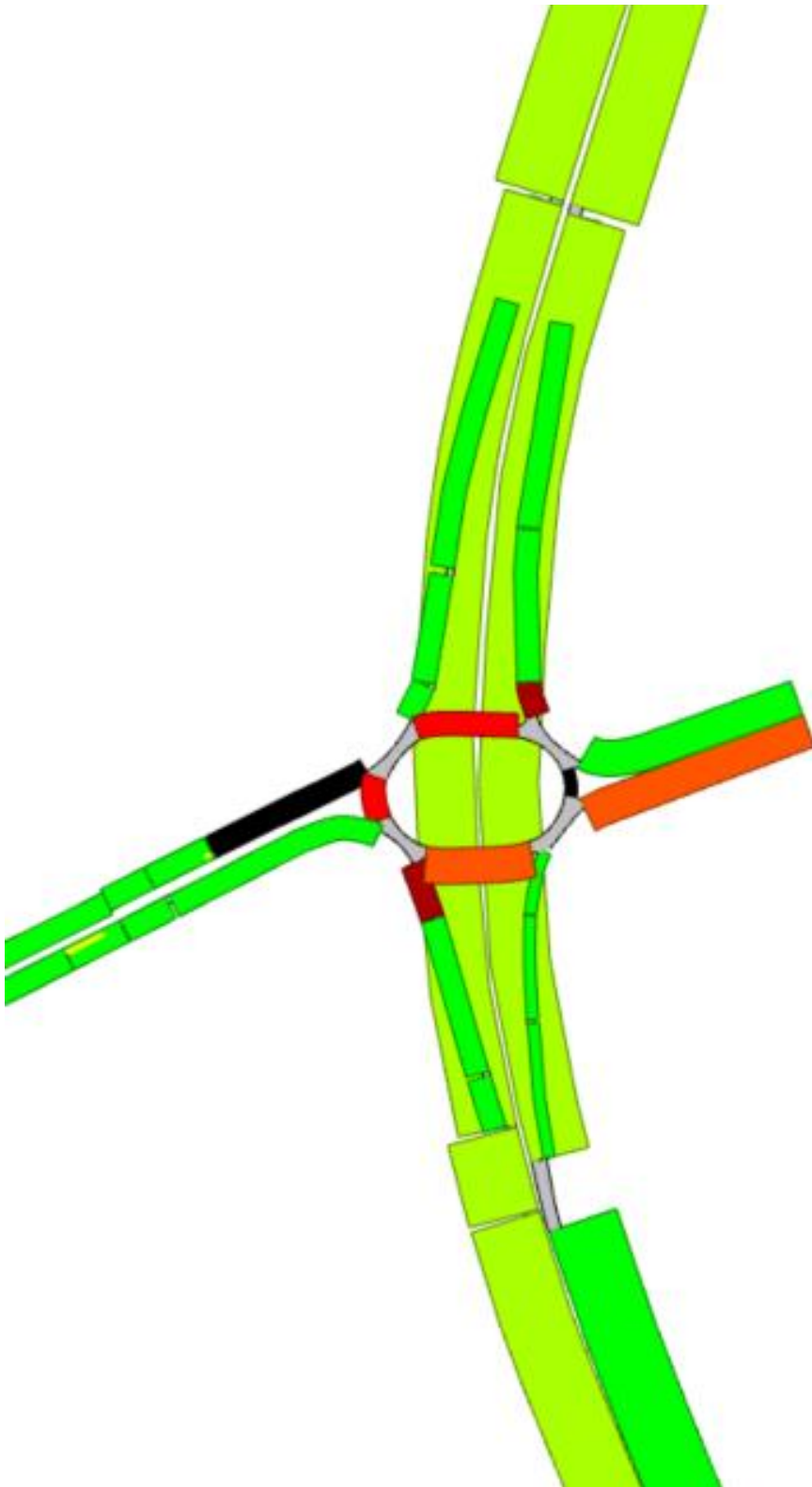
Evening Peak: Downhill Lane



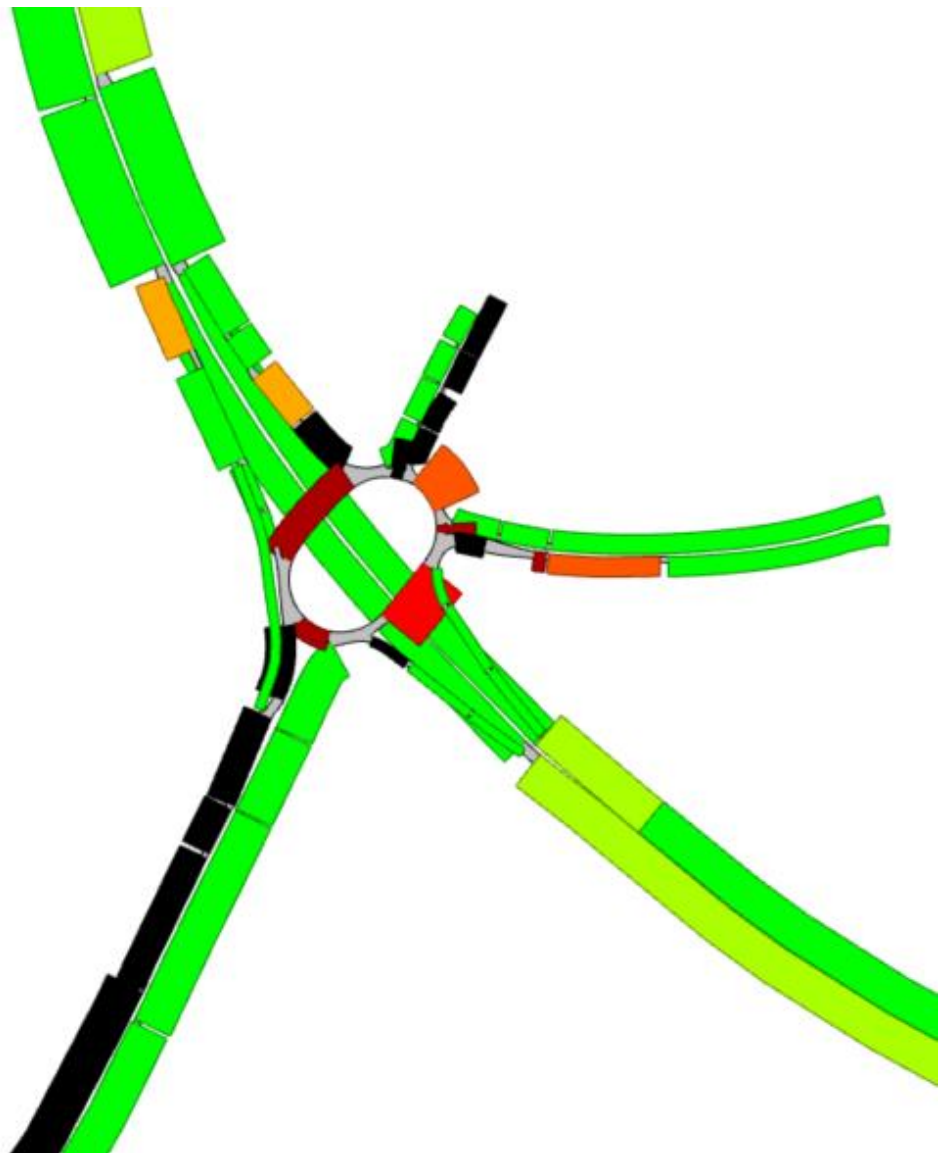
Evening Peak: Wessington Way



Evening Peak: Chester Road



Evening Peak: Doxford Park



**Core Strategy and Development Plan 2015 – 2033  
(CSDP) Examination**

**Statement of Common Ground  
as agreed between  
Sunderland City Council,  
Natural England and Hellens Group**

**December 2018**

## Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between Sunderland City Council, Natural England (NE) and Hellens.
- 1.2 The Statement sets out the confirmed points of agreement between the Council, Natural England and Hellens with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033.

## Background

- 2.1 Sunderland have been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation, Natural England submitted a formal response to the draft plan on 12/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated the following issues;
  - The HRA does not provide sufficient detail of proposed measures to mitigate the impact of developments within 6km of the Northumbria Coast Special Protection Area (SPA). Further detail is required within the HRA to provide certainty that the proposed mitigation measures can be delivered and that they are effective in preventing adverse effects. A number of other suggested minor modifications to the HRA are suggested (PD2787)

## Agreed matters

- 3.1 In response to the representations made by Natural England a Statement of Common Ground has been agreed between Sunderland City Council, Natural England and Hellens Group, which addresses most of the issues raised.
- 3.2 Hellens Group have undertaken an initial HRA for the site and shared this with Sunderland City Council. The Council have subsequently shared this with Natural England to ascertain whether this is adequate to address the issues raised through Natural England's representations.
- 3.3 Following this initial HRA work, it is now agreed by all parties that further HRA work is required to identify and secure appropriate mitigation for site HGA7: North Hylton. This work will be undertaken by the site promoter (Hellens) and agreed with Natural England.
- 3.4 It is agreed that the additional HRA work will address the following matters:
  - Clarify whether mitigation measures will entail a contribution to SAMM only, SANG only, or a combination of **Suitable Alternative Natural Greenspace (SANG)** and **Strategic Access Monitoring and Management (SAMM)**
  - Making clear the effectiveness of any proposed SANG, its location and its impacts on the local and immediate surrounds.
  - Providing certainty on delivery of SANG and maintenance in perpetuity (including funding mechanism)
  - Identifying SAMM measures and provide clarity regarding the effectiveness of mitigation option(s) being proposed
  - Provide a Delivery Model for the SAMM measures; and
  - Removing the use of neighbouring designated areas (outside the development site and SANG area) for mitigation due to potential impact on nearby ecological designations
- 3.5 It is agreed that Hellens will undertake the necessary additional work identified above and agreed the findings with Natural England. Following agreement, this report will be submitted to the Planning Inspectorate in support of the submitted Core Strategy and Development Plan.
- 3.6 Any amendments to policy wording as a result of the above will also be considered prior to the Examination.
- 3.7 The additional HRA work will be undertaken expeditiously and submitted to the appointed Planning Inspector in advance of the proposed Examination in Public Hearing Sessions.


## Conclusion


- 4.1 This Statement of Common Ground sets out the areas of agreement between Sunderland City Council, Natural England and Hellens.
- 4.2 It is agreed that additional HRA work will be undertaken for Site HGA7: North Hylton, that this will be agreed with Natural England and that this will be submitted to the appointed Planning Inspector in advance of the Examination in Public Hearing Sessions.


4.3 It is agreed that should the appropriate mitigation and an appropriate mechanism for delivery not be suitably identified, Natural England will not consider the Local Plan to be 'sound' unless this allocation is removed from the Plan.



## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		19 December 2018

Signed on behalf of Natural England		
Name and position	Signature	Date
Andrew Whitehead Team Leader – Sustainable Development and Marine		19 December 2018

Signed on behalf of Hellens Group		
Name and position	Signature	Date
Simon Thorpe Director		19 December 2018



**Core Strategy and Development Plan 2015 – 2033 (CSDP)  
Examination**

**Statement of Common Ground  
as agreed between  
Sunderland City Council and  
Historic England**

**November 2018**

## Introduction

- 1.1 This Statement of Common Ground (SOCG) has been prepared jointly between the parties consisting of Sunderland City Council (the Council) and Historic England.
- 1.2 The Statement sets out the confirmed points of agreement between the Council and Historic England with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033. The intention of the SOCG is to inform the inspector and other parties about the areas of agreement between the Council and Historic England.

## Background

- 2.1 The Council has been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation, Historic England submitted formal responses to the draft plan on 20/07/2018. A copy of these responses can be found in Appendix 1.
- 2.4 The responses submitted indicate the following issues:
  - Historic England supports the Strategic Priorities; however suggests that the chapter title 'Built Environment' is changed to 'Built and Historic Environment' to encompass all element of the historic environment. (PD90)
  - Historic England welcomes the identification of the Heritage Action Zone within Policy SP2 but suggest adding more detail in the supporting text and identifying the area on Figure 13. (PD91)
  - Historic England supports the aspiration of improving accessibility for all users of the Urban Core. (PD92)
  - Historic England welcomes and supports the intention to use the opportunity of the redevelopment of the Vaux site to maximise movement for pedestrians and improve linkages to the rest of the Urban Core. (PD93)
  - Historic England welcomes the recognition of heritage assets within Policy SS2: HGA1 but suggests specifying the potential need for archaeological investigation as part of the sites development. (PD94)
  - Historic England points out that The Acoustic Mirror is both a Scheduled Ancient Monument and a Grade II Listed Building and Fulwell Mill is a Grade II\* listed building. These are incorrectly labelled within Policy SS4: HGA8. In addition, the site assessment undertaken as part of the Development Framework needs to ensure that any impact upon the significance of the designated assets has been fully understood. (PD95)
  - Historic England welcomes the reference to protecting and enhancing heritage assets within paragraph 4.61. (PD96)
  - Historic England suggests specifically referring to Newbottle Village Conservation Areas and its setting within Policy SS7: HGA11. The Development Framework needs to describe the significance of the heritage assets affected, and how the development might protect or enhance this. (PD97)
  - Historic England supports the recognition that the historic environment plays a role in improving health and wellbeing, as noted in Policy SP7.6 (iv). (PD98)

- Historic England welcomes the intention to work closely with owners of empty properties to encourage reoccupation as part of the 'Historic High Streets' Heritage Action Zone. (PD99)
- Historic England supports the intention to bring empty properties back into use as part of the 'Historic High Streets' Heritage Action Zone. (PD100)
- Historic England supports the diverse range of uses proposed as Secondary Frontages, particularly within the area covered by the 'Historic High Streets' Heritage Action Zone. (PD101)
- Historic England supports the encouragement of temporary and meanwhile uses for vacant buildings, particularly within the area covered by the 'Historic High Streets' Heritage Action Zone. (PD102)
- Historic England suggests including specific reference to the cumulative impacts of tall buildings within Policy BH1.11. (PD103)
- Historic England welcomes the approach to sustainable design and construction but suggests making specific reference to the restoration and re-use of existing buildings. (PD104)
- Historic England welcomes the recognition of heritage assets in paragraph 9.19 but suggests including reference to the need to "sustain and enhance" designated heritage assets. (PD105)
- Historic England welcomes the very positive and comprehensive approach taken to the historic environment within chapter 9 and Policy BH7. (PD106)
- Historic England supports the positive approach to the historic environment but suggests more detail on the distinctive historic environment of Sunderland. (PD107)
- Historic England supports Policy BH8 and considers it a very positive approach to protecting and enhancing heritage assets. They however suggest a minor modification of the insertion of "any contribution made by" its setting where appropriate. (PD108)
- Historic England suggests removing the word 'wholly' and including non-designated heritage assets of equivalent significance as well as Scheduled Ancient Monuments (SAM) in part 1 of Policy BH9 to align more closely with the National Planning Policy Framework (NPPF) (2012). (PD109)
- Historic England welcomes the recognition in paragraph 10.2 that GI can include historic environments. (PD110)
- Historic England welcomes the recognition that burial spaces are often of historic interest and included designated assets. (PD111)
- Historic England welcomes the recognition in Policy NE6.1 (iv) that the Green Belt is playing a purpose in preserving the setting and special character of conservation areas. (PD112)
- Historic England welcomes the reference to the Historic Landscape Characterisation Report within paragraph 10.46. (PD113)
- Historic England welcomes the reference to heritage assets in Policy WWE6.7. (PD114)

- Historic England welcomes the intention to reduce the 'barrier' effect of the ring road, as set out in Policy ST1.7. (PD115)

## Agreed matters

- 3.1 Agreed matters are set out below and themed according to the Historic England representation.

### Soundness of the Plan

- 3.2 Historic England considers the CSDP sound. The Council acknowledges this.

### Paragraph 3.3 (Strategic Priorities)

- 3.3 The Council and Historic England agree to change the Theme of Strategic Priority 7 from 'Built environment' to '**Built and historic environment**' to maintain continuity with chapter 9. (PD90; modification reference to be included by the Council)

### Paragraph 4.35 (Spatial Strategy)

- 3.4 The Council recognises the historic nature of the Urban Core and agrees with Historic England that the chapter could benefit from reference to this and the 'Historic High Streets' Heritage Action Zone partnership with Historic England. It is proposed that the following text is inserted within paragraph 4.35 (addition shown in bold):

*"The Urban Core should be a focus for main town centre uses, especially retail and office use. Within the Urban Core the council has identified a number of Areas of Change. **These are identified on Figure 13, and also include the Heritage Action Zone (HAZ), which is a five-year initiative encompassing the Old Sunderland conservation area, the Old Sunderland Riverside conservation area and part of the Sunnyside conservation area and focusses on reconnecting Fawcett Street, Church Street, High Street East and High Street West with the modern city centre.** These areas offer opportunities to transform the Urban Core. Policy SP2 seeks to direct different forms of development to the most appropriate locations to consolidate and improve these distinct areas within the Urban Core."* (PD91; modification reference to be included by the Council)

### Policy SS2: Washington Housing Growth Areas – HGA1 South West Springwell

- 3.5 The Council and Historic England have discussed the potential need to reference the requirement for archaeological investigation as part of the development of this site. It has been agreed that no change to the Policy is necessary as Policy BH9 is sufficiently robust and requires the preservation, protection and recording of archaeological and heritage assets in development. (PD91)

### Policy SS4: North Sunderland Housing Growth Areas - HGA8 Fulwell

- 3.6 The Council and Historic England agree to correct the designation of heritage assets identified in Policy SS4: HGA8. Fulwell Mill from Grade II to **Grade II\*** Listed Building and Acoustic Mirror to Scheduled Ancient Monument and **Grade II Listed Building**. Changes have also been agreed to the supporting Development Framework for this site to stipulate that development must not impact upon the significance of the designated heritage assets and historic environment. These changes have been agreed with Historic England prior to the modification of the document, which together with the proposed minor modifications to the CSDP, address the concerns raised within their representation. (PD95; modification reference to be included by the Council)

### Policy SS7: The Coalfield Housing Growth Areas - HGA11 Philadelphia

- 3.7 The Council agrees with Historic England to give further recognition to the heritage constraints of site HGA11 and agrees to include a reference the site's impact on specific heritage assets, such as Newbottle Village Conservation Area and the listed buildings of the Philadelphia Complex (addition shown in bold):

*"iii. provide sensitive design that relates to the development of the Philadelphia Complex by providing a buffer to the west between the residential development and the proposed commercial development and incorporates design that relates to the area's historic past **including Newbottle Village Conservation Area, and Listed Buildings in the locality**".*

Changes have also been agreed to the supporting Development Framework for this site to stipulate that development must not impact upon the significance of the designated heritage assets and historic environment. These changes have been agreed with Historic England prior to the modification of the document, which together

with the proposed minor modifications to the CSDP, address the concerns raised within their representation. (PD97; modification reference to be included by the Council)

### Paragraph 9.2 (Built and Historic Environment)

- 3.8 The Council agrees with Historic England the need to recognise the ‘cumulative impacts’ of tall buildings in Paragraph 9.2 and that no changes are necessary to Policy BH1 to demonstrate this. It is proposed that Paragraph 9.2 is amended to read (addition shown in bold):

*“The council is committed to delivering excellence in development quality. It expects all new development to embrace the principles of sustainable design, positively respond to the character and setting, as well as avoiding harmful **and/or cumulative** impacts to the amenity of neighbouring buildings, local character and heritage assets.”* (PD103; modification reference to be included by the Council)

### Policy BH2: Sustainable Design and Construction

- 3.9 The Council and Historic England have discussed the potential reference to the restoration and re-use of existing buildings within Policy BH2. It was agreed that no change to the Policy was necessary as it is sufficiently robust as existing. (PD104)

### Paragraph 9.19 (Built and Historic Environment)

- 3.10 The Council and Historic England agree to include a reference in the supporting text of Policy BH5 to the need to sustain and enhance designated heritage assets in relation to shop fronts. It is proposed to amend the text in Paragraph 9.19 to (addition shown in bold):

*“Proposals in such areas would therefore be required to **sustain and enhance the significance of designated heritage assets and** take account of any other appropriate planning guidance...”* (PD105; modification reference to be included by the Council)

### Paragraph 9.23 (Built and Historic Environment)

- 3.11 The Council and Historic England agree to remove ‘cultural and built heritage’ and replace with ‘**historic environment**’ in Paragraph 9.23. (PD107; modification reference to be included by the Council)

### Policy BH8: Heritage assets

- 3.12 The Council acknowledges Historic England’s concerns that Policy BH8.1 is inconsistent with national policy and agrees to insert additional text to better reflect the NPPF (2012) (addition shown in bold):

*“Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset(s), including **any contribution made by its setting where appropriate.**”* (PD108; modification reference to be included by the Council)

### Policy BH9: Archaeology and recording of heritage assets

- 3.13 The Council agrees with Historic England that Policy BH9.1 is more onerous than the NPPF (2012) and proposes the following change (deletion shown in bold):

*“Development which adversely affects the archaeological interest or setting of a Scheduled Ancient Monument will be refused planning permission unless **wholly** exceptional circumstances exist that satisfy the requirements of the NPPF (2012).”*

The Council agrees with Historic England to recognise non-designated assets of equivalent archaeological significance within Policy BH9.1 (addition shown in bold):

*“Development which adversely affects the archaeological interest or setting of a Scheduled Ancient Monument (**or non-designated asset of equivalent significance**) will be refused planning permission unless **wholly** exceptional circumstances exist that satisfy the requirements of the NPPF (2012).”* (PD109; modification reference to be included by the Council)



## Conclusion


- 4.1 Historic England has stated that the Submitted Plan is considered sound and has been improved as a result of the modifications set out within this Statement of Common Ground. Whilst the plan is considered to be sound, the Council and Historic England have suggested one major modification to Policy BH9, which has improved the substance of the policy. Both parties note that this suggested change will be considered by the Inspector during the course of the Examination.

# Statement of Common Ground

**Signed on behalf of Sunderland City Council**

Name and position	Signature	Date
<b>Iain Fairlamb</b> Head of Planning and Regeneration		9 November 2018

**Signed on behalf of**

Name and position	Signature	Date
Barbara Hooper Principal, Historic Places Team Historic England		9 November 2018

## Appendix 1

### Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD100
<b>Response Date</b>	20/07/18 16:41
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

**Q1**

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 62, Policy H5

**Q2**

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

**Q3**

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

We support the intention to bring empty properties back into use. This is extremely important in the Sunderland Historic High Streets Heritage Action Zone, and we are already working with the council and partners to help bring this about.

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD101
<b>Response Date</b>	20/07/18 16:42
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
---	----------

<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 72, Policy VC3
---	---------------------

Q2

<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
---	-----------------------------

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We support the diverse range of uses proposed for the areas proposed as Secondary Frontages. These include the area identified as the Sunderland Historic High Streets Heritage Action Zone, where non-retail uses might be more appropriate.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication  
Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD102

**Response Date** 20/07/18 16:42

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Q1**

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 75, Policy VC6

**Q2**

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

**Q3**

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

We support the encouragement of temporary and meanwhile uses for vacant buildings, as noted in part (vii). This will of particular relevance for the Sunderland Historic High Streets Heritage Action Zone.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication  
Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD103

**Response Date** 20/07/18 16:43

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Q1**

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 77, Policy BH1

**Q2**

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

**Q3**

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

We support this very positive approach to high quality design. In part (11), it is important to recognise that there may be cumulative impacts from tall buildings (for example, the existence of one tall building does not necessarily justify a cluster).

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Incorporate a reference to cumulative impacts, eg: *'form a positive relationship with the skyline and topography of the site and the surrounding area, including consideration of any cumulative impacts'.*

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication  
Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD104

**Response Date** 20/07/18 16:43

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 78, Policy BH2

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome this very positive approach to sustainable design and construction. However, while paragraph 9.6 identifies that sustainable design can include how existing buildings can be re-used, the policy wording of BH2 appears to be focused more on new development rather than refurbishment. Given that many historic buildings have gone through many forms of use in their lifetime, and continue to offer many opportunities for refurbishment and re-use, it would be good to recognise that within the policy wording.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Amend section (5) to incorporate: *'provide flexibility and adaptability, where appropriate, seeking restoration and re-use of existing buildings, and allowing future modification of use...'* etc.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

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**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD105

**Response Date** 20/07/18 16:44

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 80, Policy BH5

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the recognition in part (3), and in paragraph 9.19, that extra care will be required for designated heritage assets. However, the policy wording would be strengthened by referencing the need to sustain and enhance the significance of the assets.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Either amend Policy BH5, or incorporate within the wording of paragraph 9.19, that proposals will need to sustain and enhance the significance of the designated heritage assets.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

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**Address** Bessie Surtees House  
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**Event Name** Core Strategy and Development Plan Publication  
Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD106

**Response Date** 20/07/18 16:44

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 81, Policy BH7

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the very positive and comprehensive approach taken to the historic environment within this chapter and through this policy and the corresponding suite of heritage policies.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD107
<b>Response Date</b>	20/07/18 16:44
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 81, paragraph 9.23
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes with minor changes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	
<b>Q4</b>	

We welcome the very positive approach taken by the council to the historic environment. It would be helpful to identify somewhere within the plan not only what types of historic assets are contained within the city, but their nature, and how they contribute towards making the city distinctive.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Incorporate reference to the distinctive historic environment of Sunderland.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD108
<b>Response Date</b>	20/07/18 16:45
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 82, Policy BH8

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We support this policy, and its very positive approach to protecting and enhancing heritage assets. We would, however, suggest a minor wording change to the final sentence of part (1) to ensure that there is reference to the contribution made by the setting to the asset's significance.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Amend the final sentence of part (1) to read '*...conserve and enhance the significance and character of the asset(s), including any contribution made by its setting where appropriate.*' This will ensure that the policy better reflects the NPPF, paragraph 128.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

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- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

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**Company / Organisation** Historic England

**Address** Bessie Surtees House  
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**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD109

**Response Date** 20/07/18 16:45

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 83, Policy BH9

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We support the robust approach to protecting archaeological assets.

Part (1) may need a slight clarification. Paragraphs 132 and 133 of the NPPF refer to permission being refused in the circumstances of substantial harm or loss, but less than substantial harm should be weighed against public benefits (which arguably might not be 'wholly exceptional?').

Paragraph 139 of the NPPF refers to the need for non-designated assets that are demonstrably of equivalent significance to scheduled monuments to be treated as if designated. The policy as currently written does not appear to provide sufficient protection for these types of assets.

#### Q5

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Clarify part (1) to reflect the NPPF paragraphs 132, 133 and 134. For example, the removal of the word 'wholly' may ensure that this better reflects the advice.

Incorporate a phrase in part (1) such as '*...setting of a Scheduled Ancient Monument (or non designated asset of equivalent significance) will be refused unless...*'.

#### Q6

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

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**Company / Organisation** Historic England

**Address** Bessie Surtees House  
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**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD110

**Response Date** 20/07/18 16:45

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 85, Policy NE1

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome this policy, in particular the recognition (in paragraph 10.2) that GI can include historic environments.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD111
<b>Response Date</b>	20/07/18 16:46
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Paragraph

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Paragraph 10.30

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the recognition that burial spaces are often of historic interest and included designated assets.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

---

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD112
<b>Response Date</b>	20/07/18 16:46
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 90, Policy NE6
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	
<b>Q4</b>	

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We welcome the recognition in part (iv) that the Green Belt is playing a purpose in preserving the setting and special character of conservation areas.

This should be reflected in the site assessment contained in the Development Frameworks for Policy HG11, commented upon above, to ensure that the significance of the Conservation Area is fully understood, including the contribution made by its setting. This would then enable the role of the Green Belt in protecting the setting to be fully understood.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

---

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
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**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD113

**Response Date** 20/07/18 16:46

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Paragraph

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 93, paragraph 10.46

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

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We welcome the reference to the Historic Landscape Characterisation Report within this section.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD114
<b>Response Date</b>	20/07/18 16:47
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 99, Policy WWE6

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD115
<b>Response Date</b>	20/07/18 16:47
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
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<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 107, Policy ST1
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Q2

<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
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Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the intention to reduce the 'barrier' effect of the ring road, as set out in part (7). This is a significant issue in the Sunderland Historic High Streets Heritage Action Zone, and we would welcome the opportunity to explore appropriate solutions with the council in due course.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

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- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD90
<b>Response Date</b>	20/07/18 16:37
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Table
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Paragraph 3.3, Strategic Priorities
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes with minor changes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	
<b>Q4</b>	

We support the Strategic Priorities, in particular the theme encompassing the historic environment. However, this should be titled 'Built and Historic Environment' to effectively encompass all those elements of the historic environment that might be designated and/or have historic significance. Archaeological remains, for example, may not be defined as 'built environment', but can be of national importance.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

As above, retitle the Strategic Priority to read '*Built and historic environment*'.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

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- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD91
<b>Response Date</b>	20/07/18 16:38
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Figure
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 36, Figure 13
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes with minor changes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	
<b>Q4</b>	

We welcome the recognition of the Sunderland Heritage Action Zone within Policy SP2 Urban Core, and the intention to protect and enhance heritage assets. However, it is not mentioned within the supporting text. Some explanation would be helpful. In addition, although the areas within the Urban Core (including Sunnyside and the Minster Quarter), contain some of the most numerous and richest heritage assets within the City, it is disappointing that these are not mentioned within the text, or referenced in any way to indicate that they might influence development as required by the NPPF. The previous (draft) version of the Plan contained good detail on this, and while we can appreciate the need for brevity, the absence of any reference to the rich historic environment within the Urban Core appears to be a significant omission from the Publication Draft.

#### Q5

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Incorporate a short reference to the HAZ within the supporting text, along with some recognition of the historic importance of areas of the Urban Core, and how these could influence the design and contribute towards the authenticity, diversity and vibrancy of the wider Urban Core.

#### Q6

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD92
<b>Response Date</b>	20/07/18 16:38
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 37, Paragraph 4.37
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	
<b>Q5</b>	

**to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

We support the intention to consider accessibility for all users as part of the Urban Core. The ring road currently creates a significant barrier for movement from the town centre eastwards to the Heritage Action Zone, and we would welcome involvement in discussions to consider options for improvement.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD93

**Response Date** 20/07/18 16:38

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 37, Policy SS1

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome and support the intention to use the opportunity of the redevelopment of the Vaux site to maximise movement for pedestrians and improve linkages to the rest of the Urban Core. This site offers significant opportunities for improving access and linkages along the riverside, both east and west.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD94

**Response Date** 20/07/18 16:39

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 39, Policy HGA1

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the intention to protect the open aspect to the Bowes Railway Scheduled Ancient Monument. However, we note from the accompanying document on the Sunderland Development Frameworks (June 2018) that the site assessment has also identified that '*The early 18th century Birtley Fell Waggonway is recorded as running through the proposed development site. There is the potential for an archaeological resource relating to this to be present on the site.*' We would recommend that some reference is made to the potential for archaeological investigation, either within the supporting text or the policy.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

As above, incorporate a reference to the potential need for archaeological investigation.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD95

**Response Date** 20/07/18 16:39

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 44, Policy HGA8

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:** . Justified

Q4

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness**

**to set out your comments.**

The Acoustic Mirror is both a Scheduled Ancient Monument and a Grade II Listed Building. The Lime Kilns are Grade II, and Fulwell Mill is Grade II\*. The policy references need correcting.

The site assessment undertaken as part of the Sunderland Developments Framework does not identify the significance of these assets, including any contribution made by their setting. It is therefore not possible to identify if and how this allocation would harm the assets, or whether this could be alleviated by mitigation.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Review the assessment undertaken for this site allocation to ensure that any impact upon the significance of the designated assets has been fully understood. If additional mitigation is required, this needs to be incorporated into the policy wording. Further information on site allocations and assessments for harm on the historic environment can be found on our website at <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD96

**Response Date** 20/07/18 16:39

**Status** Submitted

**Submission Type** Web

**Version** 0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 47, Policy SS6

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes with minor changes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:** . Justified

Q4

We welcome the reference to protecting and enhancing heritage assets within paragraph 4.61. These assets include a cluster of Grade II and Grade II\* buildings at Ryhope Pumping Station, along with a Scheduled Ancient Monument, and the Grade II Tunstall Lodge, and the proposed Supplementary Planning Document will need to ensure that the significance of these assets is protected and enhanced.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**



## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD97
<b>Response Date</b>	20/07/18 16:40
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
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<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Page 50, Policy HGA11
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Q2

<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes with minor changes (please continue to Q4)
---	--

Q3

<b>If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:</b>	Justified
---	-----------

Q4

We welcome the reference to the area's historic past within this policy, and the need to protect long distance views from the south. However, the policy does not refer to the Newbottle Village Conservation Area, which is within 800m of the site. This allocation should therefore be informed by an understanding of the significance of the Newbottle Village Conservation Area, including any contribution made by its setting. The Development Frameworks document, while referencing the Conservation Area, does not describe the significance of the heritage assets affected, or how this development might protect or enhance this.

A greater understanding of the role that the setting of the Conservation Area plays in its significance would not only justify this policy and site allocation, but would also support Policy NE6.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Ensure that an assessment has been made of the impact upon the significance of nearby heritage assets, and incorporate any avoidance of harm into the policy.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

**Consultee** Ms Barbara Hooper (1147410)

**Email Address** barbara.hooper@historicengland.org.uk

**Company / Organisation** Historic England

**Address** Bessie Surtees House  
41-44 Sandhill  
Newcastle upon Tyne  
NE1 3JF

**Event Name** Core Strategy and Development Plan Publication  
Draft

**Comment by** Historic England (Ms Barbara Hooper - 1147410)

**Comment ID** PD98

**Response Date** 20/07/18 16:40

**Status** Submitted

**Submission Type** Web

**Version** 0.1

**Q1**

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Policy

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 53, Policy SP7

**Q2**

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

**Q3**

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

We support the recognition that the historic environment plays a role in improving health and wellbeing, as noted in part 6(iv).

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Consultee</b>	Ms Barbara Hooper (1147410)
<b>Email Address</b>	barbara.hooper@historicengland.org.uk
<b>Company / Organisation</b>	Historic England
<b>Address</b>	Bessie Surtees House 41-44 Sandhill Newcastle upon Tyne NE1 3JF
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	Historic England (Ms Barbara Hooper - 1147410)
<b>Comment ID</b>	PD99
<b>Response Date</b>	20/07/18 16:41
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1

Q1

**Which part of the Plan does this representation relate to? Please tick the applicable box?** A Paragraph

**Please identify which policy, paragraph, chapter, figure or table number you are referring to:** Page 58, paragraph 6.8

Q2

**Do you support this policy/paragraph/chapter/figure/table?** Yes (please continue to Q4)

Q3

**If you answered no, please choose from the options below why you think the policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

Q4

We welcome the intention to work closely with owners of empty properties to encourage reoccupation. This is a core element of the Sunderland Historic High Streets Heritage Action Zone, and we are already working with the council to bring redundant buildings back into use.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**

No (please go to Q8)

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

# **Sunderland Core Strategy and Development Plan**

**2015 – 2033 (CSDP) Examination**

## **Statement of Common Ground**

**as agreed between**

**Sunderland City Council and**

**Marine Management Organisation**

**October 2018**



## **Introduction**

- 1.1 This Statement of Common Ground (SOCG) has been prepared jointly between the parties consisting of Sunderland City Council (the Council) and the Marine Management Organisation (MMO).
- 1.2 The intention of the SOCG is to inform the inspector and other parties about the areas of agreement between the Council and the MMO.

## **Background**

- 2.1 The Council has been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation the MMO did not submit representations to the Plan. The MMO did make representations to the Draft Plan (2017), which the Council took into consideration when preparing the Publication Draft of the Plan.


## **Agreed matters**


- 3.1 The Council and MMO agree that there are no strategic planning issues. Both parties agree to continue to work together in the preparation of Sunderland's Local Plan.

## **Conclusion**

- 4.1 The MMO considers that the Submitted Plan is considered to be sound and there are no strategic planning issues which have not been agreed upon. The Council and the MMO have agreed to continue to work together on strategic planning matter in Sunderland.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		16/10/2018

Signed on behalf of		
Name and position	Signature	Date
Zoe Mackay Marine planning officer (north east)		16/10/2018

# **Sunderland Core Strategy and Development Plan**

**2015 – 2033 (CSDP) Examination**

## **Statement of Common Ground**

**as agreed between**

**Sunderland City Council and**

**Natural England**

**December 2018**

## Introduction

- 1.1 This Statement of Common Ground (SOCG) has been prepared jointly between Sunderland City Council (the Council) and Natural England.
- 1.2 The Statement sets out the confirmed points of agreement between Natural England and the Council with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033. The intention of the SOCG is to inform the inspector and other parties about the areas of agreement between the Council and Natural England.

## Background

- 2.1 The Council has been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation Natural England submitted a formal response to the draft plan on 26/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated the following issues:
  - Natural England does not consider the CSDP to be compliant with national policies that seek to conserve and enhance the natural environment (see PD2751, PD2762, PD2764, PD2787, PD2808).
  - Policy NE1 (Green Infrastructure) is supported, and in particular the focus on the multi-functional character of GI and the link to the GI Delivery Plan (see PD2762).
  - Policy NE2 (Biodiversity and Geodiversity) and supporting text is welcomed overall, and net gains in biodiversity is particularly supported. However, with regards to dealing with adverse impacts to European sites, a third and final test of compensation needs to be referenced, and further reference to the mitigation measures proposed in the Habitats Regulations Assessment is required in relation to the 2 HGA sites proposed, to demonstrate that mitigation measures can be appropriately delivered (see PD2751).
  - The text supporting Policy NE12 (agricultural land) should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land, in line with NPPF para 112 (see PD2764).
  - Appendix 2 (HRA) is broadly supported, but mitigation and delivery methods relating to 2 HGA sites should be clarified and further developed in order to ensure that the Core Strategy will not have adverse effects on European designated sites. Minor amendments to table and figures are also identified (see PD2787).

- Appendix 2 (Sustainability Appraisal) is broadly supported, but the SA and the HRA need to be aligned in terms of their approach towards the level of impact and mitigation required in relation to the HGA sites. Bespoke monitoring indicators should be chosen relating to the outcomes and effects of the plan itself, not wider changes. Monitoring indicators are suggested for use. (see PD2808)

## Agreed matters

3.1 Agreed matters are set out below and themed according to the Natural England representation.

### Policy NE2 (1)

3.3 The Council and Natural England agree that the policy should begin with “**Where appropriate, development must demonstrate how it will:**”

### Paragraph 10.9 (supporting Policy NE2 Biodiversity and Geodiversity)

3.4 The Council and Natural England agree that no additional changes are required to Policy NE2. The Council agrees to update Paragraph 10.9 and include additional text (shown here in bold):

#### Paragraph 10.9:

“Any proposal that is likely to have a significant effect on a European site, either alone or in combination with other plans or projects, will need to undertake an Appropriate Assessment. **Where necessary, planning obligations will be secured to implement avoidance and mitigation measures for strategic sites HGA7 and HGA8. Mitigation measures will include a combination of Strategic Access Monitoring and Management (SAMM) and the provision of Suitable Alternative Natural Greenspace (SANG).** Proposals for development or land use that would adversely affect a European Site, either individually or in combination with other plans or projects, will only be permitted where the developer can demonstrate that there are imperative reasons of overriding public interest, including those of a social or economic nature, and there is no alternative solution. **Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained in these instances.**”

#### Paragraph 10.16

3.5 In order to provide clarity to the above alteration to Policy NE2(1), the Council and Natural England agree that Paragraph 10.16 should include additional text (shown here in bold):

#### Paragraph 10.16:

“The forthcoming Biodiversity and Geodiversity SPD will support the natural environment policies, **and this will include clarification regarding the types of development that require delivery of net gains in biodiversity.** The A&D Plan will identify land to deliver this policy.”

### Paragraph 10.50

3.6 The Council and Natural England agree that no additional wording is required to paragraph 10.50 (text supporting Policy NE12).


## Habitats Regulations Assessment and Sustainability Appraisal


- 3.7 The Council and Natural England have agreed that the Plan HRA has been updated and incorporates the outcomes of the HRA site (HGA8) and therefore the SA in relation to HGA8 does not need to be updated. The Plan HRA identifies mitigation measures necessary for site HGA8.
- 3.8 The Council and Natural England have agreed that the HRA for HGA7 is outstanding and will be submitted to the Inspector as part of the examination in public. The Council, Hellens and Natural England have agreed in a Statement of Common Ground that further work needs to be undertaken on the HRA for site HGA7 to demonstrate that adverse effects on European designated sites can be mitigated. The site HRA will be submitted to the Council and incorporated into the HRA for the Core Strategy and Development Plan. Until such time, Natural England will continue to object to the soundness of the allocation of HGA7 as set out in Appendix 1.

## Conclusion

- 4.1 Natural England confirms that the Submitted Plan is considered sound once the HRA is updated and demonstrates that the allocated sites can be mitigated.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		19 December 2018

Signed on behalf of		
Name and position	Signature	Date
Andrew Whitehead Team Leader – Sustainable Development and Marine		19 December 2018

## Appendix 1: Natural England submitted comments

Date: 27 July 2018  
Our ref: 249925  
Your ref: Sunderland City Council Core Strategy and Development Plan  
Publication Draft



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

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir/Madam,

**Planning consultation:** Sunderland City Council Core Strategy and Development Plan Publication Draft

**Location:** Sunderland

Thank you for your consultation on the above dated 12 June 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

### **Representation form**

This letter provides further detail on comments made on Representation Form, as well as additional comments and advice.

### **Core Strategy**

Natural England recognises that comments at this stage of the plan making process should be based on the Tests of Soundness as set out in paragraph 182 of the National Planning Policy Framework (NPPF). Having reviewed the policies and allocations within the plan Natural England does not consider it compliant with national policies that seek to conserve and enhance the natural environment. We have set out below a number of amendments which will enable your authority to ensure that the plan meets the tests of soundness.

Natural England welcomes Policy EN1 on Green Infrastructure (GI) and in particular the focus on the multi-functional character of GI and the link to the GI Delivery Plan.

The supporting text of Policy NE12 on Agricultural Land should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land, in line with NPPF para 112.

We also welcome Policy NE2 on biodiversity and geodiversity. The policy includes a general statement on the protection, creation, enhancement and management of biodiversity and geodiversity as well as the provision of net gains in biodiversity. We understand that a forthcoming Supplementary Planning Document (SPD) will explain further what would be considered as net gain, including a proposed metric. We also understand there will be connections between the net gain policy and the GI Delivery Plan. The SPD will therefore be instrumental in implementing the net gain aspect of the local plan.

The policy also includes European designated sites. Whereas the policy includes the tests that are required when a proposal has an adverse effect (no suitable alternatives, imperative reasons of

overriding public interest and securing compensatory measures), the text in section 10.9 misses out the final test of compensation, which should therefore be added.

However, the policy lacks a clear reference to the mitigation measures proposed in the Habitats Regulations Assessment, whilst there is uncertainty whether these measures can be delivered. Please see the representation form and the section below for details.

#### **Habitats Regulations Assessment (HRA)**

Natural England concurs that the Housing Growth Areas allocated within the zone of influence for the Northumbria Coast Special Protection Area are likely to have significant effects upon this site.

The HRA proposes mitigation measures (chapter 9), which are a combination of providing greenspace, access management and monitoring within the protected sites. Due to the unique character of the coast, greenspace provision can never truly provide an alternative, therefore its impacts in reducing recreational disturbance to the coast will be limited. We therefore support the inclusion of access management measures and monitoring in the assessment.

We do not consider that the report provides enough certainty that mitigation can be delivered. We advise that there should be further clarification on what measures will be taken forward. These measures should be aimed at preventing or mitigating the impacts from the Core Strategy specifically, which includes the allocation of dwellings within the zone of influence.

This includes clarification on which measures will be taken forward, when they will be implemented and how they will be funded. In addition, consideration should be given to cost of the measures (whether this would render allocations unviable). For some measures, further detail is needed to show these would be effective, e.g. on the times and locations of dog-leash restrictions, coastal ranger locations, details on the leaflets aimed at dog walkers, access measures, locations of information panels and use of volunteers.

The delivery mechanisms should therefore be further developed. Examples of this are the HRA for the South Sunderland Growth Area SPD, or the recreation management plan for the Redcar and Cleveland Local Plan. Without further detail, it cannot be ascertained that the Core Strategy will not have adverse effects on European designated sites.

If a mitigation plan is developed, a link to this plan within the core strategy would provide clarity on its existence. Redcar and Cleveland Council included the following within their Local Plan's N4 policy on biodiversity:

“Within 6km of the Teesmouth and Cleveland Coast SPA and Ramsar Site, as illustrated on the Policies Map, proposals that would result in a net increase in residential units, or other development that would lead to increased recreational disturbance of the site's interest features, will be expected to contribute towards strategic mitigation measures identified in the Recreation Management Plan” (p 193-194)

#### **Further advice on the HRA**

Section 8.20 refers to a Figure 3 that is not included.

Sections 8.33 – 8.41 discuss the improvement of greenspaces ('SANG') to draw visitors away from the coast. Maps of the greenspaces and their location in reference to the development sites would be useful. Details of the improvements and how this will draw people towards the greenspace will need to be provided.

It is unclear whether the greenspace improvements are used as mitigation measure for these two development sites only, or if they are meant to draw visitors from a larger area. Their function will impact on the requirements for the greenspaces, such as the provision of parking and the need to monitor its usage.

Section 8.45 mentions that Strategic Access Management and Monitoring (SAMM) should be



continued in perpetuity. It should be noted that greenspace used as mitigation should also be maintained in perpetuity. If the Local Authority requests a 20-year contribution from developers, it will need to be shown how the additional years of maintenance will be funded.

It is proposed to monitor the usage of greenspaces. This can be useful if it is a strategic greenspace meant to draw people from a wide area, however, if it is for a single development site only, monitoring may not add much value. Instead, directing these funds to monitoring and managing the protected sites may be more beneficial.

The in-combination assessment states that it assesses 'residual effects', however, the report does not state what these residual effects are. If residual effects are identified, only these should be taken forward in the in-combination assessment with other plans and projects. If a plan has likely significant effects that have been mitigated fully, then the in-combination assessment is not necessary. If an in-combination assessment is necessary, the only plans and projects that need to be taken into account are those that have no likely significant effects alone, or have residual effects. It is not necessary to include plan effects that have been mitigated.

Table A1 and Figure 1 in Appendix 3 are unclear: the meaning of the 'row labels' and the X-axis are not explained. These figures need to evidence how the zone of influence has been determined, in particular as a previous assessment showed that 75% of visitors resided within a buffer larger than 6 km. A map of the zone of influence and the development sites would also be useful.

### **Sustainability appraisal**

Natural England welcomes the amendments that have been made following our previous advice.

The Sustainability Appraisal includes an assessment of all candidate Housing Growth Areas (HGAs). For clarity, it would be useful to have a table of those HGAs allocated in the Core Strategy only. This would make it clearer which effects are anticipated from this plan specifically.

An HGA site is assessed as having a minor negative effect if it is within 6km of European designated sites. Presumably, this is taken from the Habitats Regulations Assessment that identifies housing development within 6km from the coastal designated sites as having a likely significant effect. The SA assessment does not take mitigation into account. Therefore, as the HRA identifies likely significant effects pre-mitigation, the same level of effect should be applied to the SA (significant negative effects).

The requirements of the SEA regulations specify that the report should include a description of measures envisaged concerning monitoring. This SA report states that these will be included in the forthcoming Implementation and Monitoring Framework and there is no further detail regarding these measures.

The SA report recommends to use the indicators from the SA framework. However, the biodiversity indicators are largely driven by factors other than the plan's performance (e.g. SSSI condition). They are thus likely to be of little value in monitoring the performance of the Plan. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes. Bespoke indicators should be chosen relating to the outcomes of development management decisions.

Natural England advises that the SA report should include further detail on the indicators to be used when monitoring the effects of the plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117). Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Ellen Bekker on 02082257091. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Ellen Bekker  
Lead Adviser  
Sustainable Development  
Northumbria Area

**Core Strategy and Development Plan 2015 – 2033  
(CSDP) Examination**

**Statement of Common Ground  
as agreed between  
Sunderland City Council,  
Natural England and Hellens Group**

**December 2018**

## **Introduction**

- 1.1 This Statement of Common Ground has been prepared jointly between Sunderland City Council, Natural England (NE) and Hellens.
- 1.2 The Statement sets out the confirmed points of agreement between the Council, Natural England and Hellens with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033.

## **Background**

- 2.1 Sunderland have been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 In response to this statutory consultation, Natural England submitted a formal response to the draft plan on 12/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated the following issues;
  - The HRA does not provide sufficient detail of proposed measures to mitigate the impact of developments within 6km of the Northumbria Coast Special Protection Area (SPA). Further detail is required within the HRA to provide certainty that the proposed mitigation measures can be delivered and that they are effective in preventing adverse effects. A number of other suggested minor modifications to the HRA are suggested (PD2787)

## Agreed matters


- 3.1 In response to the representations made by Natural England a Statement of Common Ground has been agreed between Sunderland City Council, Natural England and Hellens Group, which addresses most of the issues raised.
- 3.2 Hellens Group have undertaken an initial HRA for the site and shared this with Sunderland City Council. The Council have subsequently shared this with Natural England to ascertain whether this is adequate to address the issues raised through Natural England's representations.
- 3.3 Following this initial HRA work, it is now agreed by all parties that further HRA work is required to identify and secure appropriate mitigation for site HGA7: North Hylton. This work will be undertaken by the site promoter (Hellens) and agreed with Natural England.
- 3.4 It is agreed that the additional HRA work will address the following matters:
  - Clarify whether mitigation measures will entail a contribution to SAMM only, SANG only, or a combination of **Suitable Alternative Natural Greenspace (SANG)** and **Strategic Access Monitoring and Management (SAMM)**
  - Making clear the effectiveness of any proposed SANG, its location and its impacts on the local and immediate surrounds.
  - Providing certainty on delivery of SANG and maintenance in perpetuity (including funding mechanism)
  - Identifying SAMM measures and provide clarity regarding the effectiveness of mitigation option(s) being proposed
  - Provide a Delivery Model for the SAMM measures; and
  - Removing the use of neighbouring designated areas (outside the development site and SANG area) for mitigation due to potential impact on nearby ecological designations
- 3.5 It is agreed that Hellens will undertake the necessary additional work identified above and agreed the findings with Natural England. Following agreement, this report will be submitted to the Planning Inspectorate in support of the submitted Core Strategy and Development Plan.
- 3.6 Any amendments to policy wording as a result of the above will also be considered prior to the Examination.
- 3.7 The additional HRA work will be undertaken expeditiously and submitted to the appointed Planning Inspector in advance of the proposed Examination in Public Hearing Sessions.


## Conclusion


- 4.1 This Statement of Common Ground sets out the areas of agreement between Sunderland City Council, Natural England and Hellens.
- 4.2 It is agreed that additional HRA work will be undertaken for Site HGA7: North Hylton, that this will be agreed with Natural England and that this will be submitted to the appointed Planning Inspector in advance of the Examination in Public Hearing Sessions.

4.3 It is agreed that should the appropriate mitigation and an appropriate mechanism for delivery not be suitably identified, Natural England will not consider the Local Plan to be 'sound' unless this allocation is removed from the Plan.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		19 December 2018

Signed on behalf of Natural England		
Name and position	Signature	Date
Andrew Whitehead Team Leader – Sustainable Development and Marine		19 December 2018

Signed on behalf of Hellens Group		
Name and position	Signature	Date
Simon Thorpe Director		19 December 2018





**Core Strategy and Development Plan 2015 – 2033  
(CSDP) Examination**

**Statement of Common Ground  
as agreed between  
Sunderland City Council and the  
NHS Sunderland Clinical Commissioning Group**

**December 2018**

## Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council and the NHS Sunderland Clinical Commissioning Group.
- 1.2 The Statement sets out the confirmed points of agreement between the Council and the NHS Sunderland Clinical Commissioning Group with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033.

## Background

- 2.1 Sunderland have been working to prepare the CSDP which will establish the strategic planning policy framework for the City. Throughout the preparation of the Plan, the Council has been working with the NHS Sunderland Clinical Commissioning Group to establish future health provision needs during the Plan period. Health is a cross cutting theme of the Plan. Chapter 5 in particular identifies how Sunderland will become a healthy place by 2033. The Plan recognises that development cannot come forward in Sunderland unless health provision is addressed. Individual policies in the Plan identify how health provision will be secured in the future, for example;
  - All housing allocation policies in the Plan require developers to “address impacts and make provision or contributions towards education provision and healthcare”;
  - Policy ID1 requires that “Development will be expected to provide, or contribute towards the provision of: i. measures to directly mitigate the impacts of the development and make it acceptable in planning terms; and ii. Contribute towards the delivery of essential infrastructure identified in the IDP”. As stated in paragraph 14.6, health is considered to be infrastructure; and
  - Policy ID2 sets out when development will be expected to make a planning contribution and paragraph 14.12 clarifies that health provision would be required.
- 2.2 The Plan is also supported by an Infrastructure Delivery Plan which is a live document and identifies the infrastructure requirements to deliver the growth identified in the Plan. This will be updated as and when required. Contained within the IDP are details on the current health provision in the City.
- 2.3 In June 2018, the Council published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. In response to this statutory consultation, NHS Sunderland Clinical Commissioning Group submitted a formal response to the draft plan on 12/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The Council is also progressing with a Supplementary Planning Document (SPD) which includes further details on how the Council will secure Planning Obligations. A draft of this document has been consulted on and the NHS Sunderland Clinical Commissioning Group has made representations to the SPD which are currently being taken into consideration. It is the Councils intention to consult on the SPD once the Local Plan has been through an examination in public.

2.5 This Statement of Common Ground deals with the matters raised in Appendix 1 relating to the Publication Draft Core Strategy and Development Plan.

### Agreed matters

3.1 In response to the representations made by NHS Sunderland Clinical Commissioning Group, the following points of agreement have been reached. Where minor modifications to the plan have been proposed, the new text is shown in bold.

<p>The NHS Sunderland Clinical Commissioning Group supports paragraph 5.54 and reference to “An increase and change in the composition of Sunderland’s population over the Plan period could place additional pressure on health care facilities in the City, thus requiring improvements to existing facilities or new purpose built premises”. (PD67)</p>	<p>Matter agreed. No modification proposed to the Plan</p>
<p>The NHS Sunderland Clinical Commissioning Group suggests that the Infrastructure Delivery Plan, section 5.48, should be updated to reflect the most recent figure for the number of GP practices and buildings available to GP’s (PD67 &amp; PD73).</p>	<p>Matter agreed, the Council has updated the IDP to include data provided by the NHS Sunderland Clinical Commissioning Group on the number of GP practices. The Council and NHS Sunderland Clinical Commissioning Group will continue to work together to update the IDP.</p>
<p>The NHS Sunderland Clinical Commissioning Group suggests updating the Infrastructure Schedule in section 7 of the Infrastructure Delivery Plan to include health infrastructure schemes. (PD67 &amp; PD73)</p>	<p>Agreed that the Council and NHS Sunderland Clinical Commissioning Group will work together to prepare a robust evidence base which identifies where additional health capacity is required and the cumulative impact of development on General Practice and community health.</p>
<p>The NHS Sunderland Clinical Commissioning Group supports criterion 2 of policy SS2 and the explicit reference to healthcare amongst others. (PD68)</p>	<p>Matter agreed. No modification proposed to the Plan</p>
<p>The NHS Sunderland Clinical Commissioning Group generally supports policy SP7 and requests that student accommodation be listed within paragraph 5.5 as a type of development that will require a Health Impact Assessment (HIA). (PD69)</p>	<p>The Council have proposed the following modification to Paragraph 5.5 of the CSDP to include student accommodation within the definition of major development for the purposes of Policy SP7:</p> <p>“For clarity, major development within the context of this policy is considered to be residential schemes for 100 dwellings or more, <b>student accommodation schemes for 100 bed spaces or more</b>, or any other form of development for which an Environmental Impact Assessment would be required.”</p>
<p>The NHS Sunderland Clinical Commissioning Group</p>	<p>Following discussions, the Council and</p>

<p>considers the thresholds for contributions towards health infrastructure being sought should be set at 50 dwellings or more, student accommodation of 50 bed spaces or more, or any other form of development for which an Environmental Impact Assessment is required. (PD 69)</p>	<p>NHS Sunderland Clinical Commissioning Group have agreed that the threshold for HIA should remain at 100 dwellings or more.</p> <p>The Council have clarified that the threshold does not restrict planning contributions to be sought towards necessary health infrastructure improvements for schemes below this threshold. Policies ID1 and ID2 of the Plan allow for contributions to be sought for any scale of development, where justified.</p>
<p>The NHS Sunderland Clinical Commissioning Group objects to the inclusion of the word "significant" in policy SP7 (6vii) and requests its removal. (PD69)</p>	<p>Following discussions, the Council and NHS Sunderland Clinical Commissioning Group have agreed that significant does not need to be removed from the policy.</p>
<p>The NHS Sunderland Clinical Commissioning Group supports policy HS1 criterion 2, that development must ensure cumulative impacts would not result in significant and adverse impacts on the local community, and recommend that it is appropriate to apply this criterion to applications of 50 dwellings or more, as identified in representation PD69. (PD70)</p>	<p>Matter agreed. No modification proposed to the Plan</p>
<p>The NHS Sunderland Clinical Commissioning Group supports the inclusion of health facilities within the definition of Community Facilities in the glossary. (PD71)</p>	<p>Matter agreed. No modification proposed to the Plan</p>
<p>The NHS Sunderland Clinical Commissioning Group proposes that a definition of Local Services be included in the glossary. (PD71)</p>	<p>The Council have agreed the following proposed minor modification to the glossary:  <b>"Local Services - A facility that provides a valuable local service to the community such as a small convenience store, post office or public house."</b></p>
<p>The NHS Sunderland Clinical Commissioning Group supports policy VC5 and reference to "delivery". (PD72)</p>	<p>Matter agreed. No modification proposed to the Plan</p>
<p>The NHS Sunderland Clinical Commissioning Group suggests that an additional criterion be added to policy VC5, requiring development to contribute to the delivery of healthcare infrastructure to mitigate impacts from development. (PD72)</p>	<p>The Council and NHS Sunderland Clinical Commissioning Group agree that policies ID1 and ID2 already adequately require developers to contribute towards infrastructure to mitigate the impacts of development, including health infrastructure. It is therefore agreed that no modifications are required to policy VC5.</p>
<p>The NHS Sunderland Clinical Commissioning Group objects to the draft Planning Obligations Supplementary Planning Document and requests that a specific section be created dedicated to health infrastructure. (PD72)</p>	<p>These matters will be dealt with as part of the preparation of the SPD, they are not relevant to the Plan.  The Council and NHS Sunderland Clinical</p>

The NHS Sunderland Clinical Commissioning Group objects to section 12 of the draft Planning Obligations Supplementary Planning Document as it makes no reference to health infrastructure. (PD72)	Commissioning Group have agreed that a monthly working group will be established contribute towards the preparation of the SPD.
The NHS Sunderland Clinical Commissioning Group supports policy ID2 and its approach to development contribution towards the provision of delivery of essential infrastructure identified in the IDP. (PD73)	Matter agreed. No modification proposed to the Plan
The NHS Sunderland Clinical Commissioning Group supports reference to “health” as a physical infrastructure in paragraph 14.12. (PD74)	Matter agreed. No modification proposed to the Plan
The NHS Sunderland Clinical Commissioning Group objects to paragraph 14.15 and the text “preference will be given to the needs and priorities of an area and the wider benefits of development, such as, for example regeneration and meeting housing need”, as in context of the city area, where health is a problem, all health facilities are at capacity. (PD74)	Following discussions, the Council and NHS Sunderland Clinical Commissioning Group have agreed that the infrastructure needs to make a development acceptable will be dealt with on a case by case basis. The Council and NHS Sunderland Clinical
The NHS Sunderland Clinical Commissioning Group objects to the approach to seeking planning contributions. Preference should not be given to one need over another in cases of proven viability issues, but rather apportioned contributions of an equal percentage to all infrastructures should be made. The NHS Sunderland Clinical Commissioning Group suggests that the methodology for determining preference should be set out in the policy and not in the Planning Obligations Supplementary Planning Document. (PD74)	Commissioning Group will continue to work together to prepare evidence which justifies the health needs across the City.

## 4. Next Steps

4.1 The Council and NHS Sunderland Clinical Commissioning Group have agreed that:

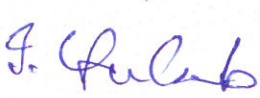
- The NHS Sunderland Clinical Commissioning Group will submit additional evidence to identify where deficiencies in health infrastructure exist and where there is an identified need for additional health provision across the city. This evidence should include capacity of health provision across Sunderland, where deficiencies are, potential mitigation measures and costings for mitigating development.
- Once this evidence is submitted to the Council, the Council will update the IDP and Planning Obligations SPD where necessary.
- A working group will be established in January 2019 to progress the IDP and SPD. Both parties will continue to work together to ensure the IDP is up to date.


## 5. Conclusion

5.1 This Statement of Common Ground sets out the areas of agreement between Sunderland City Council and NHS Sunderland Clinical Commissioning Group, including proposed minor modifications to the Core Strategy and Development Plan to address the issues raised.

5.2 The NHS Sunderland Clinical Commissioning Group confirms that the Submitted Plan is considered sound and has been improved as a result of the proposed modifications set out within this Statement of Common Ground.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		14/12/18

Signed on behalf of Sunderland NHS Clinical Commissioning Group		
Name and position	Signature	Date
David Gallagher Chief Officer		13/12/2018

## Appendix 1



## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
<b>Email Address</b>	andrew.moss@wardhadaway.com
<b>Address</b>	Sandgate House 102 Quayside Newcastle upon Tyne UNE1 3DX
<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD62
<b>Response Date</b>	12/07/18 17:20
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Chapter
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Foreword
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	

**policy/paragraph/chapter/figure or table is unsound.  
Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

The emerging Plan is welcomed it being a vital component to securing Sunderland's long term economic future, encouraging inward investment, new employment opportunities and infrastructure.

The respondent would record that infrastructure includes health infrastructure, public health being an issue in the City.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

response to be read in conjunction with other responses by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To enable full debate on issues arising.

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
<b>Email Address</b>	andrew.moss@wardhadaway.com
<b>Address</b>	Sandgate House 102 Quayside Newcastle upon Tyne UNE1 3DX
<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD63
<b>Response Date</b>	12/07/18 17:21
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	2.32 - 2.33
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Consistent with National Policy

**policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

It is agreed that public health is an issue in the City. It is also agreed that residents of Sunderland continue to live on average shorter lives than the England average. It follows that health is an issue that the City / the Plan needs to positively respond to in planning for the future. The respondent has a key role in this. The respondent would record that health infrastructure in the City and all premises are at capacity. In this respect whilst welcoming new development the respondent would record that the healthcare infrastructure implications of any proposed relevant development must be considered and mitigated as part of the granting of any planning permission.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

This representation is to be read in conjunction with other representations submitted by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To enable full debate on issues arising.

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
<b>Email Address</b>	andrew.moss@wardhadaway.com
<b>Address</b>	Sandgate House 102 Quayside Newcastle upon Tyne UNE1 3DX
<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD64
<b>Response Date</b>	12/07/18 17:21
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	3.2
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	

**policy/paragraph/chapter/figure or table is unsound.  
Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support expressed for the Spatial Vision. In particular support the following bullet points;

"is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations" (bullet 3);

"Is more socially, economically and environmentally sustainable" (bullet 4);

"has improved its social infrastructure, with additional healthcare, education and community facilities" (bullet 5).

Support in particular the reference to additional healthcare in bullet 5. Improvement in healthcare infrastructure will need to be delivered in part through the mitigation of health infrastructure impacts arising from proposed relevant development. A robust policy context within the Plan is needed to provide this.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

This representation is to be read in conjunction with others submitted by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To enable full debate on issues arising.

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- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

## HGA Sites

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
<b>Email Address</b>	andrew.moss@wardhadaway.com
<b>Address</b>	Sandgate House 102 Quayside Newcastle upon Tyne UNE1 3DX
<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD65
<b>Response Date</b>	12/07/18 17:22
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	3.3
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	



**policy/paragraph/chapter/figure or table is unsound.  
Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support Strategic Priority 3, namely to promote healthy lifestyles and ensuring the development of safe and inclusive communities, with facilities to meet daily needs that encourage social interaction and improve health & wellbeing for all.

Amongst other things the delivery of this priority will require additional healthcare infrastructure which will need to be in part through the mitigation of health infrastructure impacts arising from proposed relevant development. A robust policy context within the Plan is needed to provide this.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Response to be read in conjunction with other responses by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

**HGA Sites**

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
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<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD66
<b>Response Date</b>	12/07/18 17:22
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	SP1
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Positively Prepared . Effective

**policy/paragraph/chapter/figure or table is unsound. Is it because it is not:** . Justified

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

To be sound an additional criterion needs to be added to SP1 (2), namely a requirement that development mitigates its impacts, this being an essential part of delivering sustainable patterns of development and includes for example the provision of Sustainable Urban Drainage, the mitigation of education impacts and through the mitigation of health infrastructure impacts arising from proposed relevant development.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

An additional criterion needs to be added to SP1 (2), namely a requirement that development mitigates its impacts.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

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**HGA Sites**

**HGA Sites**

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
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<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD67
<b>Response Date</b>	12/07/18 17:23
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Paragraph
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	4.31
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Positively Prepared . Effective

policy/paragraph/chapter/figure or table is . Justified  
unsound. Is it because it is not:

Q4

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

There is a need for the Infrastructure Delivery Plan to be updated in terms of Healthcare, sections 5.43 – 5.54 pertain. Amongst other things the number of GP practices and buildings they have available to them have changed from the figures stated. The comment in para 5.54 of the IDP that an increase and change in the composition of Sunderland's population could place additional pressure on health care facilities in the City, thus requiring improvements to existing facilities or new purpose – built infrastructure is agreed. The Infrastructure Schedule, section 7 needs to be updated to include health infrastructure and the respondent and the LPA need to work together to progress this.

Q5

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Infrastructure Delivery Plan needs to be updated.

Q6

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

Q7

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HGA Sites

HGA Sites

## Comment

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<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD68
<b>Response Date</b>	12/07/18 17:23
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	SS2
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	

**policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support criterion 2 and the explicit reference to contributions to healthcare amongst others.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Representation to be read in conjunction with others submitted by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

**HGA Sites**

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
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<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD69
<b>Response Date</b>	12/07/18 17:25
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	SP7
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Effective . Justified



**policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

In general terms support the policy. It is understood from a meeting with officers that Health Impact Assessments will be a validation requirement for developments above a certain size. In addition to those referred to in para 5.5 it is suggested that student accommodation be additionally listed.

Following on from the above it is understood that the need or otherwise for a Health Impact Assessment will not impact on whether or not a Health Infrastructure contribution would be required, the reason for the thresholds in para 5.5 being to minimise the planning application validation burden.

The respondent considers appropriate thresholds for contributions towards health infrastructure being sought should be 50 dwellings or more and student accommodation of 50 beds or more. The respondent further considers these numbers should be written into the policy. Whilst the threshold could be set lower the threshold of 50 dwellings / 50 student bedrooms would help retain the workload at manageable levels for the CCG at this point in time and pooling would be less of an issue albeit one which may be overcome through possible legislative changes.

A further objection is made that inclusion of the word 'significant' in 6(vii) and in reasoned justification para 5.5. The requirement of the policy should be the mitigation of any impacts on health infrastructure, that being part of appropriate mitigation.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

set thresholds for contributions towards health infrastructure as being developments of 50 dwellings or more and student accommodation of 50 beds or more.

remove 'significant' in criterion 6(vii).

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

**HGA Sites**

## Comment

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<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD70
<b>Response Date</b>	12/07/18 17:26
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	HS1
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	Yes (please continue to Q4)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	

**policy/paragraph/chapter/figure or table is unsound.  
Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support criterion 2, namely that development must ensure that the cumulative impacts would not result in significant and adverse impacts on the local community. It is appropriate that cumulative impacts are considered and this supports the respondent's comments on policy SP7 mitigation should be required as part of any application for 50 dwellings or more.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Response to be read in conjunction of other responses submitted by the respondent.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

**HGA Sites**

## Comment

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<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD71
<b>Response Date</b>	12/07/18 17:26
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Chapter
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	Glossary
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	Effective

**policy/paragraph/chapter/figure or table is unsound.  
Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support the inclusion health care facilities within the definition of Community Facilities.

Object that there should be a definition of Local Services in the Glossary.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Set out definition of Local Services in the Glossary.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

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## Comment

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<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD72
<b>Response Date</b>	12/07/18 17:27
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	VC5
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Positively Prepared . Effective

**policy/paragraph/chapter/figure or table is  
unsound. Is it because it is not:**

Justified

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support the policy as drafted and in particular the reference to 'delivery'.

Object that an additional criterion should be added, namely requiring development to contribute to the delivery of healthcare infrastructure amongst other infrastructure to mitigate the impact of a relevant local development.

The interrelationship between this policy and the Planning Obligations SPD needs to be worked through. Section 3.1 of the Draft SPD currently suggests that health infrastructure falls within 'other site specific requirements' (final bullet). Object that health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport. Health is a particular issue in Sunderland and all premises are at capacity. In the circumstances it is not sound to leave health infrastructure to 'other'.

Without prejudice to the above, Section 12 of the SPD provides further guidance in relation to other site specific requirements. It refers amongst other things to contributions towards burial space and contributions towards public art. It does not however refer to contributions towards health facilities notwithstanding the reference in the final bullet of 3.1, an apparent omission in the document as currently drafted. That said, as detailed above, the respondent considers the SPD should have a specific section in relation to health infrastructure acknowledging the importance of health in the City.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Additional criterion should be added requiring development to contribute to the delivery of healthcare infrastructure amongst other infrastructure to mitigate the impact of a relevant local development.

Object that health infrastructure should have a specific section within the SPD as does education, open space, equipped play space, ecology, sport and recreation, highways and public transport.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

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**HGA Sites**

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## Comment

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<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD73
<b>Response Date</b>	12/07/18 17:28
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	ID1
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	Effective

**policy/paragraph/chapter/figure or table is unsound. Is it because it is not:**

**Q4**

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support development being expected to provide, or contribute towards the provision of delivery of essential infrastructure identified in the IDP.

As noted in the respondent's comment to reasoned justification para 4.31, there is a need for the Infrastructure Delivery Plan to be updated in terms of Healthcare. Amongst other things the number of GP practices and buildings has changed from the figures in IDP para 5.48. As stated in para 5.54 of the IDP an increase and change in the composition of Sunderland's population could place additional pressure on health care facilities in the City, thus requiring improvements to existing facilities or new purpose – built infrastructure.

Following on from the above, the Infrastructure Schedule, section 7 needs to be updated to include health infrastructure. The respondent and the LPA need to work together to progress this.

**Q5**

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

Update / change Infrastructure Delivery Plan.

**Q6**

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?** Yes (please go to Q7)

**Q7**

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To enable full debate on issues arising.

**Please indicate whether you wish to be notified of any of the following by ticking the appropriate box**

- . When the Core Strategy and Development Plan Publication Draft has been submitted to the Secretary of State
- . When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act
- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

## HGA Sites

## Comment

<b>Agent</b>	Mr Andrew Moss (1033992)
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<b>Address</b>	Sandgate House 102 Quayside Newcastle upon Tyne UNE1 3DX
<b>Consultee</b>	(1169700)
<b>Company / Organisation</b>	NHS Sunderland CCG
<b>Address</b>	Sunderland Clinical Commisioning Group Loftus House Sunderland SR5 3XB
<b>Event Name</b>	Core Strategy and Development Plan Publication Draft
<b>Comment by</b>	NHS Sunderland CCG ( - 1169700)
<b>Comment ID</b>	PD74
<b>Response Date</b>	12/07/18 17:28
<b>Status</b>	Submitted
<b>Submission Type</b>	Web
<b>Version</b>	0.1
<b>Q1</b>	
<b>Which part of the Plan does this representation relate to? Please tick the applicable box?</b>	A Policy
<b>Please identify which policy, paragraph, chapter, figure or table number you are referring to:</b>	ID2
<b>Q2</b>	
<b>Do you support this policy/paragraph/chapter/figure/table?</b>	No (Please continue to Q3)
<b>Q3</b>	
<b>If you answered no, please choose from the options below why you think the</b>	. Positively Prepared . Effective

policy/paragraph/chapter/figure or table is  Justified  
unsound. Is it because it is not:

Q4

**Please give details of why you consider the policy/paragraph/chapter/figure or table is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the policy/paragraph/ chapter/figure or table which your representation relates to, please also use this box to set out your comments.**

Support the reference in reasoned justification paragraph 14.12 to 'health' in the list of physical infrastructure to be funded through obligations.

Object to reasoned justification paragraph 14.15 which states that where there is a viability issue, preference will be given to the needs and priorities of an area and the wider benefits of development, such as, for example regeneration and meeting housing need. In the context of a City where health is a particular issue, reasoned justification paragraph 2.32 pertains, the respondent considers this is not sound especially as all premises are at capacity.

The approach should not be to prefer one needed contribution over another in case of proven viability issues but rather to apportion contributions towards the various infrastructure which is required to mitigate the impact of the development by way of an equal percentage discount to each requirement. The methodology for so doing should be set out in the Policy and not in an SPD.

Q5

**Please set out the change(s) you consider necessary to make the policy/paragraph/ chapter/figure or table legally compliant or sound. You will need to say why this change will make it legally compliant or sound. Please be as precise as possible in your response. It would be very helpful if you are able to put forward your suggested revised wording of any policy, paragraph or chapter text in the box below.**

When there is a proven viability issue apportion contributions towards the various infrastructure which is required to mitigate the impact of the development by way of an equal percentage discount to each requirement. The methodology for so doing should be set out in the Policy and not in an SPD.

Q6

**If your representation is seeking a change to the Plan, would you like to attend and participate at the Public Examination to express your views?**  Yes (please go to Q7)

Q7

If you would like to attend and participate at the Public Examination, please outline why you consider this to be necessary. Please note the Planning Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To enable full debate on issues arising.

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- When the Planning Inspector's Report is published, detailing the recommendations under Section 20 of the Act

- . When the Core Strategy and Development Plan is adopted

**HGA Sites**

**HGA Sites**

Core Strategy and Development Plan 2015-2033  
(CSDP) Examination

Statement of Common Ground  
as agreed between Sunderland  
City Council and University of  
Sunderland

November 2018



## Introduction

- 1.1 This Statement of Common Ground has been prepared jointly between the parties consisting of Sunderland City Council and the University of Sunderland.
- 1.2 The Statement sets out the confirmed points of agreement between the Council and the University of Sunderland with regard to the submitted Core Strategy and Development Plan (CSDP) 2015-2033.

## Background

- 2.1 Sunderland have been working to prepare the CSDP which will establish the strategic planning policy framework for the City.
- 2.2 In June 2018, the Councils published the Publication draft of the CSDP for statutory consultation under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2012.
- 2.3 In response to this statutory consultation the University of Sunderland submitted a formal response to the draft plan on 25/07/2018. A copy of this response can be found at Appendix 1.
- 2.4 The response submitted indicated the following issues:
  - Requests that para 3.2 Spatial Vision 2033, pg 28 with the section that confirms what will be achieved by 2033, the points "is entrepreneurial, a University City at the heart of a low carbon regional economy" and "values the University of Sunderland and Sunderland College who play a vital role in attracting the best minds and ensuring a skilled workforce that choose to live here" should be bullet points closer to the top of this paragraph to have more impact. See PD183
  - Object to the wording of the paragraph 2.43 Sunderland Today on page 18, which implies lack of growth in student numbers. Suggested amendments to wording. See PD182.
  - Policy H3 Student Accommodation, suggests the policy needs to confirm which elements of the Urban Core are acceptable for student accommodation and clarify the definition for student accommodation "needs". See PD184
  - Policy H6 Homes in Multiple Occupation (HMOs), suggests amendment to point 5 of policy wording to ensure consistency with other housing policy documents and avoid over supply when looking at HMOs and student accommodation collectively. See PD185

## Agreed matters

3.1 In order to address these concerns, the University of Sunderland and Sunderland City Council have been working together and have subsequently agreed the following changes to the CSDP.

- **Sunderland Today, delete exiting paragraph 2.43 and insert new paragraph 2.43, pg 18.**

*Student numbers may rise over the plan period due to demographic shift and the University's intention to target students in its key growth areas and those of the region, namely health sciences and wellbeing, advanced manufacturing, engineering and computing software and big data.*

*The expectations of some students for better quality, self-contained accommodation has seen an increase in new, purpose-built student accommodation within the city over recent years. It is recognised however that there is not always a linear relationship between increasing student numbers and demand for student residential accommodation, given the local demographic of students attending the University of Sunderland.*

(M2)

- **Spatial vision 3.2, pg 28.**

The vision is not in a hierarchal order, it is in plan chapter order and as such both parties agree it does not need to be amended.

- **Homes, Policy H3 Student Accommodation**

Additional wording at end of paragraph 6.28

*'Further information on need is set out in detail within the Student Accommodation SPD'.*

(M42)

- **Homes, Policy H3 Student Accommodation**

Additional wording to end of paragraph 6.26, pg 61

*'and that the proposal will not result in an over concentration of student accommodation or shared accommodation'.*


(M41)

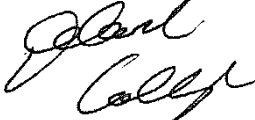
3.2 The Council cannot agree with the University of Sunderland in relation to part of comment PD184 in relation to the exclusion of Stadium Village from Urban Core for Student Accommodation due to lack of planning evidence. However, both parties will continue to discuss this aspect of the representation and any amendments needed to this statement of common ground will be made at the relevant time.

## Conclusion

- 4.1 The University of Sunderland confirms that the submitted plan is considered sound and has been improved as a result of the modifications set out within this statement of Common Ground. However, the objection in relation to excluding Stadium Village from Urban Core for Student Accommodation still stands and is not included within this agreement.

## Statement of Common Ground

Signed on behalf of Sunderland City Council		
Name and position	Signature	Date
Iain Fairlamb Head of Planning and Regeneration		16.10.18

Signed on behalf of University of Sunderland		
Name and position	Signature	Date
Deborah Callaghan Director of Estates and Facilities		5.11.2018