

Core Strategy and Development Plan

2015-33 - Publication Draft Schedule of Representations

December 2018



1. Introduction

Purpose of the Report

- 1.1 Under the requirements of Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012, this schedule summarises the 8283 representations made pursuant to regulation 20. The Council has prepared a Consultation Statement (SD.7) which includes a summary of the main issues raised.
- 1.2 In accordance with the requirements of Regulation 22(1) (d) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council has submitted all representations which are contained in Report of Representations (SD.8). The Report of Representations (SD.8) should be read alongside this Schedule.
- 1.3 The Council has proposed some additional modifications which are set out in the Schedule of Minor Modifications (SD3). These are not considered to be main modifications. In some case, the modifications reflect the Statements of Common Ground which the Council has agreed with Prescribed Bodies. These are included in SD.8k.
- 1.4 27 representations were unduly made. These have not been included this report.

Structure of the Schedule

- 1.5 The schedule includes;
 - A unique reference number (PD) for each representation which correlates to representations in the Report of Representations (SD.8).
 - The paragraph, figure, table, policy the representation relates to in the Core Strategy and Development Plan (2015-2033) (SD.1).
 - Identifies whether the respondent considers the Plan to be Legally Compliant, Positively Prepared, Effective, Justified and Consistent with the National Planning Policy Framework (NPPF) and summarised the issue(s) raised)
 - Identifies any modification proposed by the Consultee.
 - A Council response to the issues raised.
 - Any modifications the Councils' propose to make as a consequence of the representation. The proposed modification reference correlates to the Schedule of Proposed Modifications (SD.3).

Given Name	Family Name	Company/ Organisation	Rep ID	Chapter/Policy		Object Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
Angela	Blenkinsop		PD8505	Chapter		Object						No issues identified.	No issues identified.	No issues have been raised by this representation. The Council considers this Plan to be sound.	The Council considers this Plan to be sound.
Jordon, Adams, PD6462 Darren, Adamson, PD6358 Casey, Aitken, PD6398 Beverley, Allan, PD6251 Gary, Allan, PD6369 Leslie, Allan, PD6362 Julie, Allison, PD6303 Megan, Anderson, PD6267 Christine, Angus, PD6203 Claire, Appleby, PD6259 Kathryn, Armstrong, PD6150 Wayne, Badresingh, PD6350 Sharon, Badresingh, PD6438 Gavin, Bainbridge, PD6084 Karen, Bambrough, PD6347 David, Barkess, PD6207 Darren, Barkess, PD6311 Diane, Barkess, PD6417 Colin, Barnes, PD6273 Susan, Barnes, PD6414 Ruth, Barnsley, PD6175 Sarah, Barrass, PD6156 Steven, Barrass, PD6155 Mary A, Barron, PD6141 Kevin, Barry, PD6060 Maria, Barry, PD6064 Kevin, Batters, PD6345 Sylvia, Batters, PD6446 Fred, Batton, PD6448 Lydia, Baxter, PD6400 Annmarie, Beckwith, PD6324 Rose, Beeston, PD6104 Barbara, Bennison, PD6147 J, Betts, PD6333 Ashley, Bingham, PD6055 Anne, Bingham, PD6054 Louise, Black, PD6413 Jean, Blanckley, PD6117 Ian, Blanckley, PD6119 Wendy, Blanckley, PD6144 Hannah, Blanckley, PD6105 Brian, Blanckley, PD6118 Sandra, Blench, PD6339 Ashley, Bolton, PD6898 Kenneth, Bowen, PD6286 Liam, Brady, PD6424 Jamie, Broadbent, PD6900 Christine, Brough, PD6297 Margaret, Brown, PD6143 Julie, Burdett, PD6395 Anthony, Burdett, PD6390 Stewart, Bywater, PD6139 Gemma, Campey, PD6411 Henry, Carney, PD6260 Hayley, Carney, PD6238 Kathleen, Carney, PD6287 Linda, Casey, PD6168 Rebecca, Chapman, PD6165 Dorothy, Charlesworth, PD6410 David, Charlton, PD6368 Malcolm, Clark, PD6272 Keith, Clayton, PD6291 Peter, Clements, PD6132 Leeann, Collings, PD6185 Ian, Collings, PD8506 Michelle, Collins, PD6152 John, Collinson, PD6057 Deborah, Collinson, PD6058 Angela, Coombs, PD6905 Joan, Cosgrove, PD6069 Paula, Cosgrove, PD6907 Alison, Cowley, PD6911 Chloe, Coxon, PD6212 Brandon, Craig, PD6328 Beverley, Craig, PD6351 Anita, Cutts, PD6136 George, Dagg, PD6412 Thompson, Dave, PD6240 Paul, Davis, PD6145 Jean, Davis, PD6344 Linda, Davis, PD6361 Gavyn, Davis, PD6373 Mick, Davison, PD6138 David, Davison, PD6195 Carole, Dawson, PD6151 annette, dean, PD6085 david, dean, PD6231 Jack, Deehan, PD6419 Pamela, Dennis, PD6088 Andrew, Devlin, PD6379 Graeme, Dickinson, PD6202 Anita, Dickinson, PD6466 Kathryn, Dickman, PD6153 Lynn, Dinsdale, PD6124 Rebecca, Dinsdale, PD6377 Kevin, Dinsdale, PD6374 June, Dinsmore, PD6335 Jessica, Dinsmore, PD6372 Jean, Dixon, PD6109				Chapter	The Plan	Object		It is recognised that there is a need for a local plan, with a vision for the area, that is pro-growth and delivers new homes, but the Plan needs to provide jobs, minimise the need for commuting and be supported by infrastructure. The Plan is unsound as it does not deliver this, nor has it been produced with proper consultation and engagement. The Plan fails to support Neighbourhood Plans and narrows their scope.	It is recognised that there is a need for a local plan, with a vision for the area, that is pro-growth and delivers new homes, but the Plan needs to provide jobs, minimise the need for commuting and be supported by infrastructure. The Plan is unsound as it does not deliver this, nor has it been produced with proper consultation and engagement. The Plan fails to support Neighbourhood Plans and narrows their scope.				Review the Plan	The Council considers that the Plan is a sustainable strategy to deliver Sunderland's Objectively Assessed Need. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council considers that the CSDP, Draft Infrastructure Delivery Plan and Draft Planning Obligations SPD sufficiently set out the necessary infrastructure to facilitate the proposed growth and the mechanisms which will deliver this infrastructure. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council supports Neighbourhood Plans. The Council considers this Policy to be sound	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

Given Name	Family Name	Company/ Organisation	Rep ID	Chapter/Policy	Object Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
Joy, Dixon, PD6912 Peter, Dobson, PD6426 Eleanor, Dover, PD6174 Jess, Dresser, PD6079 Phyllis Ann, Duffy, PD6166 Jordan, Dunn, PD6070 Lisa, Edwards, PD6349 Jennifer, Elliott-Farrow, PD6196 Callie, Elliott-Farrow, PD6197 Joan, Emerson, PD6915 Lorraine, Emerson-Broadbent, PD8452 Nicole, Engleby, PD6313, Christine, Engleby, PD6316, John, Evans, PD6247, Susan, Evans, PD6289, Joan, Everett, PD6280, Robin, Everett, PD6386, Natalie, Ewing, PD6916, Janice, Farrow, PD6232, Keith, Farrow, PD6394, Ella, Fielding, PD6290, Joyce, Finley, PD6359, Mary Silvia, Forbes, PD6388, Cherie, Foster, PD6027, Terence, Foster, PD6248, Brian, Frankum, PD6205, Lorraine, Frost, PD6370, Jamie, Gaines, PD6294, Tim, Gallon, PD6226, Lynn, Gallon, PD6199, Brett, Gallon, PD6336, Colin, Garbutt, PD6371, Elizabeth, Gardener, PD6219, Lorna, Gatenby, PD6365, Ian, Gaunt, PD6320, Ross, Gawthorpe, PD6102, Patricia, Gawthorpe, PD6093, Norman, Gawthorpe, PD6103, Kathleen, Gibson, PD6214, Christine, Glass, PD6404, Robin, Glass, PD6453, Martin, Gonzales, PD6082, Scott, Goodacre, PD6323, Bethany, Goodacre, PD6392, Lee, Graham, PD6265, Troy, Green, PD6148, Lynn, Greenhalgh, PD6381, Eunice, Grieveson, PD6235, Amanda, Grieveson, PD6293, Angela, Griffin, PD6074, Michael, Groody, PD6249, Stephen, Hagel, PD6346, Christine, Hall, PD6194, David, Hann, PD6086, Gerard, Hannan, PD6087, Jamie, Hardy, PD6128, Paul, Harker, PD6367, Pauline, Harker, PD6387, Linda, Harland, PD6389, Harry, Harmer, PD6276, Shirley, Harrison, PD6225, Norma, Harrison, PD6472, Moira, Hartburn, PD6077, Sonia, Hawthorne, PD6917, Sharon, Hawthorne, PD6229, Dean, Hawthorne, PD6296, David, Hawthorne, PD6421, John, Hawthorne, PD6432, Linda, Hedley, PD6244, Amanda, Heron, PD6115, Christopher, Heron, PD6427, Gillian, Hesler, PD6110, Catherine, Heslop, PD6028, Peter, Hill, PD6307, Dorothy, Hill, PD6309, Donna, Hitcham, PD6268, Stuart, Hitcham, PD6263, Nathan, Holt, PD6172, Sally, Holt, PD6122, Joseph, Holt, PD6422, David, Holyoak, PD6271, Janet, Holyoak, PD6449, Lyndsey, Hood, PD6171, Ann, Hood, PD6216, Carl, Hoole, PD6071, Ann, Hooper, PD6393, Esther, Howard, PD6407, Jack, Howe-Gingell, PD6458, Evelynne, Hudson, PD6378, Carol, Humphrey, PD6127, Alison, Humphrey, PD6149, Brian, Hunter, PD6097, Ann, Huntley, PD6113, Tracey, Hutchinson, PD6253, Lesley anne, Ingleby, PD6230, David, Jackson, PD6186, Henry, James, PD6169, Neitsa, Jenkins, PD6463, Gary, Jessop, PD6176, Debra, Jobling, PD6314, Brenda, Johnson, PD6059, Ben, Johnson, PD6092,														

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Paula, Johnson, PD6252, Pauline, Johnston, PD6269, Leslie, Johnston, PD6467, Linda, Johnston, PD6469, David Alan, Johnston, PD6464, Wendy Ann, Jones, PD6201, David, Jones, PD6210, Cara Louise, Keeling, PD6334, Lisa, Kellett, PD6080, Valerie, King, PD6391, Maria, Kitching, PD6354, Arnold, Kitching, PD6356, Amy, Lappin, PD6066, Guy, Laverick, PD6161, Florence, Leggoe, PD6181, Deborah, Leung, PD6182, Shaun, Lewins, PD6245, Barbara, Liddle, PD6095, John, Lindsley, PD6433, Dawn, Lindsley, PD6435, Paul, Lindsley, PD6437, Marilyn, Lindsley, PD6428, Simon, Lindsley, PD6436, Alex, Lomax, PD6317, Adam, Lomax, PD6425, Denise, Lomax, PD6439, Kim, Lomax, PD6406, Margaret, Long, PD6423, Colin, Longstaff, PD6298, Lisa, Lowden, PD6318, Doreen, Lowes, PD6192, Edward, Lowes, PD6191, Paul, Lowson, PD6222, Valerie, Lowson, PD6228, Laura, Luke, PD6239, Dorothy, Lumley, PD6397, Peter, Lynn, PD6429, Maureen, Maddison, PD6332, Victoria, Marland, PD6281, Vivienne, Marley, PD6173, Craig, Marley, PD6114, Catherine, Marley, PD6275, Pam, Marlow, PD6108, Anthony, Martin, PD6100, Helen, Mason, PD6224, Katherine, Mason-Gage, PD6461, Pauline, McArdle, PD6242, Anne, McGorman, PD6123, Ross, McGorman, PD6131, Christopher, McKie, PD6178, Emma, McLean, PD6209, Jonathan, McLean, PD6213, Gloria, McLeary, PD6075, Lauren, McNeill, PD6256, Georgia Eve, McVaigh, PD6399, Simon, Mears, PD6062, Mathew, Metcalf, PD6261, Robert, Metcalf, PD6447, Hilary, Metcalfe, PD6215, Scott, Metcalfe, PD6218, Cameron, Miller, PD6089, Dawn, Miller, PD6154, Rosie, Milner, PD6134, John, Milner, PD6288, Lindsey, Milner, PD6338, Holly, Milner, PD6337, Ann, Milner, PD6440, James, Milner, PD6442, Lynn, Minnican, PD8159, Alan, Minnican, PD8155, Kim, Minshall, PD6299, Aron, Mistry, PD6061, Derek, Moon, PD6292, Anne, Moore, PD6072, Fred, Moralee, PD6403, John, Morley, PD6135, Linda, Morley, PD6302, Christopher, Morton, PD6383, Hazel, Munro, PD6355, Gavin, Nichols, PD6331, Maureen, Oliver, PD6401, Maria, O'Neill, PD6140, Mark, Oxlee, PD6170, Louise, Paisley, PD6264, Wendy, Parkin, PD6096, David, Parkin, PD6431, Deidre, Passmore, PD6083, Jennifer, Patterson, PD6091, Chris, Peart, PD6198, Mark, Pelley, PD6179, Ashley, Penny, PD6455, Beth, Penny, PD6454, Brian, Peverley, PD6456, Michael, Philliskirk, PD6329, Maurice, Plews, PD6258, Lyndsay, Plews, PD6266, Stephen, Plews, PD6255, Gaynor J, Plews, PD6301, Alice, Potts, PD6326, Brian, Quinn, PD6081, Christie, Rae, PD6396, Annette, Raine, PD6068,														

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Steven, Raine, PD6067, Paul, Raine, PD6206, Gordon, Raine, PD6221, Sheila, Raine, PD6343, Brenda, Ramshaw, PD6125, Katherine, Ramshaw, PD6278, Janice, Ramshaw, PD6246, Anthony aLAN, Ramshaw, PD6384, Helen, Rashad, PD6341, Teresa, Rayner, PD6130, Megan Claire, Rayner, PD6193, Michael, Redhead, PD6283, Robert, Redhead, PD6418, Yvonne, Reed, PD6236, David, Reed, PD6473, Alan, Reed, PD6918, Peter, Richardson, PD6177, Kristian, Roberts, PD6279, Malcolm, Robertson, PD6919, Andrew, Robertson, PD6200, Bethan, Robertson, PD6211, Ann, Robson, PD6099, Linda, Robson, PD6262, Nicola, Rochelle, PD6471, D, Russell, PD6107, Raymond, Rutter, PD6457, Carol, Rutter, PD6459, Glen, Sayer, PD6468, Myra, Scott, PD6137, Graham, Shelley, PD6444, Russell, Simpson, PD6101, Susan, Sims, PD6300, Nicola, Sims, PD6450, Terry, Smith, PD6053, Edward, Smith, PD6121, Deborah, Smith, PD6129, Kieran, Smith, PD6227, Jill, Somerville, PD6243, Arthur, Speck, PD6470, Kevin Michael, Spiland, PD6445, Simon, Sproat, PD6420, Maureen, Stanley, PD6116, Paula, Stedham, PD6360, Derek, Stenger, PD6284, Lisa, Stenger, PD6277, Lyn, Stewart, PD6120, Kevin, Stewart, PD6363, Joyce, Stokoe, PD6098, Paul John, Stronach, PD6065, Anthony, Stronach, PD6133, Karen, Stronach, PD6204, Paul, Stronach, PD6353, Joanne, Stronach, PD6357, Maureen, Stronach, PD6364, Steve, Stronach, PD6366, Stephen, Stronach, PD6415, Christine, Stronach, PD6402, Rose, Stronach, PD6416, Grace, Sykes, PD6409, Marivsz, Szpir, PD6443, Andrea, Taylor, PD6385, Daniel, Ternent, PD6237, Anne, Ternent, PD6056, Amy, Thompson, PD6090, Emma, Thompson, PD6241, Thora, Thompson, PD6254, Michael, Thompson, PD6274, Ross, Thompson, PD6282, Steven, Thompson, PD6257, Finnley, Thompson, PD6285, Jack, Thomson, PD6163, John, Thurlbeck, PD6094, Elizabeth, Towers, PD6167, Kerry, Trotter, PD6076, Christine, Trotter, PD6380, Sarah, Troup, PD6158, Lynda, Usher, PD6078, Peter, Vasey, PD6340, Anne, Vasey, PD6342, Alan, Vincent, PD6441, June, Vincent, PD6430, John, Wallace, PD6223, Catherine, Wanless, PD6408, Michael, Waters, PD6063, Michelle, Waterson, PD6312, Lynda, Watson, PD6111, Linda, Watson, PD6126, Haydn, Watson, PD6183, Lynn, Watson, PD6234, Maureen, Watson, PD6465, Peter, Watson, PD8534, Charles, Welbon, PD6308, Pauline, Welbon, PD6310, Reginald, Whitaker, PD6106, Amanda, White, PD6146, Lyne, Whiteford, PD6405, Scott, Williams, PD6315, Lindsay, Williams, PD6319, Nigel, Williams, PD6376, Kate, Williamson, PD6921, Lynn, Williamson, PD6922, David, Williamson, PD6928,														

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Steven, Wilson, PD6217, Jack, Wilson, PD6348, Gavin, Wilson, PD6375, Ryan, Wilson, PD6382, Kirsty, Wilson, PD6434, Jennifer, Wilson, PD6460, Stacey, Winter, PD6180, Janice, Worthington, PD6270, George, Worthington, PD6295, Maxine, Young, PD6073, Marie-Claire, Young, PD6330, Philip, Young, PD6327,															
Sheila	Smith		PD181	Chapter	The Plan	Object							No modification proposed.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. Full justification to site HGA9 is included in the Compliance Statement (see Policy SS7). The Council supports Neighbourhood plans. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Janet	Whithield		PD143	Chapter	No point identified	Object	No comments made	No comments made	No comments made	No comments made	No comments made	No comments made.	No modifications proposed.	The Council considers this Plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Marina	Clark		PD8289	Chapter	No point identified	Object						No comments made.	No modifications proposed.	The Council considers the plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lloyd	Sherrit		PD8291	Chapter	No point identified	Object						No comments made.	No modifications proposed.	The Council considers the plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Helen	Dorman	Northumb erland County Council	PD822	Chapter	The Plan	Support				Northumberland County Council has no comments to make and looks forward to continuing to work with Sunderland City Council			No modifications proposed.	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Anthony	Ormond		PD229	Chapter	The Plan	Object	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Objection on the grounds that the Plan seeks a "high growth" option with minimal public	Suggests the strategy is not fit for purpose and does not link Sunderland's problems with	Comment noted. The Council has undertaken extensive consultation on the proposals in the Plan. A report of consultation has been published detailing this. The strategy proposed	The Council considers there have been no soundness or legal compliance issues raised by this

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							support and ignores the impact that Brexit will have on economic and population growth.	support and ignores the impact that Brexit will have on economic and population growth.	support and ignores the impact that Brexit will have on economic and population growth.	support and ignores the impact that Brexit will have on economic and population growth.	support and ignores the impact that Brexit will have on economic and population growth.	support and ignores the impact that Brexit will have on economic and population growth.	solutions, resulting in a strategy with less Green Belt, pressure on overstretched public services, greater congestion, higher levels of pollution, urban sprawl and contributing to global warming.	within the plan is based on a robust evidence base. The Council has undertaken an assessment to determine Objectively Assessed Need.	representation which require modifications to the Plan. Therefore no modifications are proposed.
Lynsey	Forth		PD84	Chapter	The Plan	Object						Object to building more houses in the Green Belt in Peshaw due to the traffic it will generate, the existing struggle to arrange doctors and dentist appointments and oversubscription of schools in the area.	Suggests that housing is not needed in Peshaw or in the Green Belt	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. Full justification to site HGA9 is included in the Compliance Statement (see Policy SS7 and in relation to the Spatial Strategy, Policy SP1).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Karen	Ramsay		PD157	Chapter	The Plan	Object						Objects on the grounds that the consultation does not take into account the views of the public in relation to Green Belt as it only asks if the policy is legally compliant or sound. Planning Committee does not adhere to planning policies in relation to affordable housing.	No modifications proposed.	The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Steve	Raine		PD466	Chapter	The Plan	Object						Objects on the grounds that the justification for the plan is dated, unproven and does not take into account local people views.	No modifications proposed.	The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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												There has been no consultation process to count peoples vote or opinion.		consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council considers this Policy to be sound.	the Plan. Therefore no modifications are proposed.
John	Foster		PD305	Chapter	The Plan	Object		Objects to the Plan on the grounds that it does not deliver a vision for all parts of the city, meet the needs for affordable housing and housing for key workers, for the economy to grow and minimise commuting and for infrastructure.	Objects to the Plan on the grounds that it is not effective.		Objects to the Plan on the grounds that it is not consistent with National Policy.		The Council need to rethink the whole process and revise much of the current plan.	The Council considers the Plan to be sound. The plan provides a strategic vision, and through various supporting evidence papers including the SHLAA and SHMA, Employment Land Review and Transport Assessment, this vision will be delivered over the plan period, enabling the city to grow sustainably whilst providing jobs and employment, housing for all and appropriate infrastructure.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
William	Emmerson		PD295	Chapter	The Plan	Object		Objects to the Plan on the grounds that it does not deliver a vision for all parts of the city, meet the needs for affordable housing and housing for key workers, for the economy to grow and minimise commuting and for infrastructure. The Plan has been prepared without proper consultation and fails to support neighbourhood plans.	Objects to the Plan on the grounds that it is not effective.		Objects to the Plan on the grounds that it is not consistent with National Policy.		The Council need to rethink the whole process and revise much of the current plan.	The Council considers the Plan to be sound. The plan provides a strategic vision, and through various supporting evidence papers including the SHLAA and SHMA, Employment Land Review and Transport Assessment, this vision will be delivered over the plan period, enabling the city to grow sustainably whilst providing jobs and employment, housing for all and appropriate infrastructure. The Council supports Neighbourhood plans. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Linda	Watson		PD196	Chapter	The Plan	Object			Objects to the Plan on the grounds that it is not effective.				No modifications proposed.	The Council considers the Plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Marjorie	Coxon		PD284	Chapter	The Plan	Object		Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed.	Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed.		Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed.		The Council needs to rethink much of the process and rethink the outdated current Local Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of the housing growth areas from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Thomas	Coxon		PD285	Chapter	The Plan	Object		Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed. Sunderland already has a small amount of Green Belt when compared to other areas. Brownfield sites are available in the Sunderland area.	Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed. Sunderland already has a small amount of Green Belt when compared to other areas. Brownfield sites are available in the Sunderland area.		Objects to the Plan on the grounds that the national Government repeatedly tell us to protect out Green Belt, so proposals to remove land from the Green Belt should not be allowed. Sunderland already has a small amount of Green Belt when compared to other areas. Brownfield sites are available in the Sunderland area.		The Council should rethink the process and the outdated current Local Plan.	Assessment and Recommendations (2018). These documents set out that the removal of the HGA sites do not have a fundamental adverse impact on the Green Belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of the housing growth areas from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of the HGA sites do not have a fundamental adverse impact on the Green Belt. The Council has identified brownfield sites in the SHLAA allocations.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Foster		PD300	Chapter	The Plan	Object		Considers the whole plan to not have been prepared positively. It fails to support neighbourhoods, urban sprawl protection and infrastructure and no real evidence of brownfield consideration.	Considers the whole plan to not be effective as it fails to support neighbourhoods, urban sprawl protection and infrastructure and no real evidence of brownfield consideration.				Revise the plan to exclude any green belt when 3,000 homes stand empty and brownfield register has not been updated since December 2017.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Michael	Chantkowski		PD227	Chapter	The Plan	Object				Objects to the Plan on the grounds that it is not compliant with the Duty to Cooperate.		Objects to the Plan as it ignores the wishes of residents who are opposed to the unsustainable development proposed. The plan should prioritise the development of brownfield land. There is no need for new housing, as the population is shrinking.	Proposes that the Plan is modified to propose building in Pennywell and on other brownfield sites.	The Council considers the Plan to be sound. Pennywell, as well as all other available brownfield sites, are identified in the SHLAA. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council considers this Policy to be sound.	
Mark	Smith		PD127	Chapter	The Plan	Object	Considers the plan is not compliant with law.	Considers the plan is not positively prepared.	Considers the plan is not effective	Considers the plan is not compliant with DTC.	Considers the plan is not consistent with national policy.	Considers the plan is not justified as does not protect greenfield areas, greenbelt and biodiversity. Consultation process is flawed due to low participation and incorrect procedures. Assumptions based on debatable predictions.	Delay the adoption of the Core Strategy until major consultation and revisions, amendments and external scrutiny of policy background information has occurred. Specific areas in need of urgent revisions- OAN, housing types, brownfield sites, Misuse of census data, no strategic planning to revitalise upgrade and enhance Urban Core.	Comment noted. The Council has undertaken extensive consultation on the proposals in the Plan. A report of consultation has been published detailing this. The strategy proposed within the plan is based on a robust evidence base.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Chris	Butler		PD896	Chapter	The Plan	Object						Size and complexity of the Plan makes it difficult to comment on. The assumptions, graphs, tables and artificial structures try to hide the true purpose of the strategy for Sunderland.	No modifications proposed.	The Council considers the Plan to be sound. The Council has made every attempt to ensure everyone has had an opportunity to have their say on the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Giles		PD162	Chapter	The Plan	Support with mods						Supports with minor changes. Mr Giles would prefer the houses not to be built, however if development is approved, a lower number of houses should be approved with a higher percentage of bungalows to avoid obtrusive views and encourage older persons to vacate larger family housing for families to occupy.	No Modification proposed.	Comments noted. The Council considers the plan to be sound. The Plan promotes a mix of housing and older persons accommodation.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ray	Delaney		PD25	Table	Foreword	Support						The Plan is welcomed as it is considered to be a vital component to securing Sunderland long term economic future, encouraging inward investment and new employment.	No proposed modification	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD62	Chapter	Foreword	Support						Supports the emerging Plan and welcomes it as a vital component to securing Sunderland's long term economic future, encouraging inward investment, new employment opportunities and infrastructure. In addition the Sunderland CCG would like to record that infrastructure includes health infrastructure, public health being an issue in the city. Response to be read in conjunction with other responses by the respondent.	The respondent would like to record that infrastructure (as defined in the Plan) should include health infrastructure as public health is an issue in the City.	The Council acknowledges in the Plan that Health infrastructure is included in the definition of infrastructure. This has been clarified through minor modifications in response to other representations made by the respondent around this issue. The Council and NHS Sunderland CCG have signed a Statement of Common Ground (SD.8K).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		The Trustees of Athenaeum Pension Scheme	PD38	Paragraph	Foreword	Support						The Plan is welcomed and is considered to be a vital component to securing Sunderland's long term economic future, which will encourage inward investment and new employment opportunities.	No modification proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
M&G Real Estate			PD3392	Paragraph	1.5	Object		Concerned about the gap between preparations of	Concerned about the gap between preparations of		Concerned about the gap between preparations of	Concerned about the gap between preparations of	Suggest a new paragraph is inserted after Paragraph 1.5	Comment noted. The Council's proposal to prepare the Local Plan over several documents has long	The Council considers there have been no soundness or legal

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								different parts of the Plan. Approach to different land uses is inconsistent. Specific allocations are made for traditional employment uses and strategic housing sites, but not for retail and other main town centre uses. Concerned that process to identify sites has not yet started.	different parts of the Plan. Approach to different land uses is inconsistent. Specific allocations are made for traditional employment uses and strategic housing sites, but not for retail and other main town centre uses. Concerned that process to identify sites has not yet started.		different parts of the Plan. Approach to different land uses is inconsistent. Specific allocations are made for traditional employment uses and strategic housing sites, but not for retail and other main town centre uses. Concerned that process to identify sites has not yet started.	different parts of the Plan. Approach to different land uses is inconsistent. Specific allocations are made for traditional employment uses and strategic housing sites, but not for retail and other main town centre uses. Concerned that process to identify sites has not yet started.	to make it clear that the weight given to save Local Plan policies should be based on their consistency with the policies of the CSDP, other material planning considerations and evidence.	been established through the Local Development Scheme. Some UDP Policies will continue to be saved until they are replaced by the emerging Allocations and Designations Plan.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lesley	Emmerson		PD291	Chapter	1	Object		Considers the chapter is not positively prepared as need a plan which has a vision for areas like Washington and Houghton and the villages. Need a vision for the economy for local jobs and minimise need to commute. It has been prepared without proper consultation with local communities.	Considers the chapter not to be effective as need a local plan that is infrastructure run to support the development. It fails to support Neighbourhood Plans and also undermines them		Considers the chapter not to be consistent with national policy.		The whole process needs rethinking and need to rewrite much of the current plan.	The Council considers the Plan to be sound. The plan provides a strategic vision, and through various supporting evidence papers including the SHLAA and SHMA, Employment Land Review and Transport Assessment, this vision will be delivered over the plan period, whilst providing jobs and employment, housing for all and appropriate infrastructure. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council has complied with all statutory obligations and followed each of these regulations. The Council supports Neighbourhood plans. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3011	Paragraph	1.2	Object			Due to the delay in production and duty for regular review the Plan period should be reduced to 3-5years. Concern that any harm caused by over development could not be undone. Diagram 1.4 is too small.				Reduce Plan period to 3-5 years.	The plan period is consistent with the NPPF which requires plans for be drawn up over an appropriate time period, preferably 15 years. It is not considered necessary to increase the size of Figure 1.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Gillian	Clements		PD188	Chapter	The Plan	Object		Objects to the Plan on the grounds that it has not been positively prepared, as it has been prepared without appropriate consultation and does not support current Neighbourhood Plans being developed.	Objects to the Plan on the grounds that it is not effective, as it has been prepared without appropriate consultation and does not support current Neighbourhood Plans being developed.		Objects to the Plan on the grounds that it is not consistent with National Policy, as it has been prepared without appropriate consultation and does not support current Neighbourhood Plans being developed.		The Council needs to reconsider the Plan in favour of less questionable and more supportive options for existing and future local communities.	The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Julian	Borthwick	Friends of Sunderland Greenbelt	PD3012	Chapter	2	Object		Concern about use of the word Coalfield within the Plan and lack of reference to historical settlements. Concern about reliability of population projections. Concern that policies only target certain groups and therefore may break the Equalities Act.	Concern about use of the word Coalfield within the Plan and lack of reference to historical settlements. Concern about reliability of population projections. Concern that policies only target certain groups and therefore may break the Equalities Act. University student number are falling and if student accommodation is a requirement the distribution of housing sites around the edge of Sunderland is not sustainable or justified. Concern that economic projections are from a single data source.				Refer to individual settlements, rather than group settlements together such as the 'Coalfield'.	The Houghton-Hetton area has been known as "The Coalfield" since the mid-1990's, as the term was used to support area regeneration. The Council considers the Plan to be sound. The plan provides a strategic vision, and through various supporting evidence papers including the SHLAA and SHMA, Employment Land Review and Transport Assessment, this vision will be delivered over the plan period, enabling the city to grow sustainably whilst providing jobs and employment, housing for all and appropriate infrastructure. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The 2012 Regulations identify three key stages of plan preparation and the minimum level of public consultation required before a Local Planning Authority (LPA) can proceed to publish a submission version of a Local Plan document. These key stages are: the preparation of a Local Plan (Regulation 18); the publication of a Local Plan (Regulation 19-20); and the submission of a Local Plan (Regulation 22). The Council has complied with all statutory obligations and followed each of these regulations. Further explanation of this process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kay	McAlinden		PD226	Chapter	2	Object							No Modification proposed.	Sunderland is a unique place and has historically been divided into character areas for planning purposes. The Council has explained the unique characteristics of these areas in the Compliance Statement, The Council considers this Chapter – and the Plan – to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Chris	Butler		PD895	Chapter	2	Object						Para 2.26 - No evidence presented to back up assertion of population growth. Para 2.29 - no description of what interventions will be used to demonstrate how decline in working age population will be reversed. Para 2.48 - little or no evidence to show brownfield sites are not viable. Strategy will lead to further	No modifications proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council has set	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												decline of urban core and majority of future housing on greenfield sites. Para 2.59 - demonstrates decline of urban core but does not provide strategy on how this will be reversed. Para 2.75 - No mention of how lack of metro services will be addressed.		out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement.	
John	Tumman	Sunderland Civic Society	PD624	Figure	3	Object		Considers figure 3 not to be positively prepared as does not indicate future population growth as specified in paragraph 2.26.					Figure 3 amended to show the projected change to the population to 2033, with explanation.	The council accept that figure 3 does not show future population levels as specified in paragraph 2.26. The Council propose an additional modification for clarification (M1).	It is estimated that Sunderland has a population of 277,962 ¹ (as shown in Figure 3). Following decades of population decline, population is growing and it is expected to continue to grow over the Plan period (as shown in Figure 3).
Ray	Delaney		PD26	Paragraph	2.35	Support						Support the statement it is vital to ensure more housing choice is available to meet the needs of our residents'.	No modification proposed	Support noted. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD63	Paragraph	2.32 - 2.33	Support					Considers the policy is consistent with national policy. Public health is an issue within the city and residents live shorter lives than England infrastructure in the city and all premises are at capacity. The healthcare infrastructure implications of any proposed relevant development must be considered and mitigated as part of the granting of planning permission.		No Modification proposed.	Policy ID2 (1ii) makes provision for the mitigation of direct or cumulative impact of development on infrastructure and refers to the draft Planning Obligations SPD which makes specific reference to health infrastructure. The Council and NHS Sunderland CCG have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ray	Delaney		PD27	Paragraph	2.37 - 2.40	Object		Mr Delaney considers that there is a need for an additional paragraph referencing the need for executive housing in the City, as the SHMA states that executive housing provision in Sunderland could have a role in response to the need for the diversification and expansion of the sub regional economy and in contributing towards achieving population and economic growth objectives (para 4.78). There is also a need for the Plan to support small and medium builder including by providing a range of sites including smaller sites amongst the housing allocations which would be available for small and medium builders.				Mr Delaney considers that there is a need for an additional paragraph referencing the need for executive housing in the City, as the SHMA states that executive housing provision in Sunderland could have a role in response to the need for the diversification and expansion of the sub regional economy and in contributing towards achieving population and economic growth objectives (para 4.78). There is also a need for the Plan to support small and medium builder including by providing a range of sites including smaller sites amongst the housing allocations which would be available for small and medium builders.	Include express commitment in Plan to ensuring the delivery of executive housing. Include commitment in Plan to support small and medium house builders. Allocate sites which would be available to small and medium house builders.	It is not considered appropriate to refer to 'executive homes' within this paragraph as the term 'executive' is not used within the plan in relation to housing. As the plan is a strategic plan with strategic allocations, any other housing allocations which would be suitable for small and medium house builders will be allocated through the Allocations and Designations Plan, if appropriate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jenny	Gibbs	University of Sunderland	PD182	Paragraph	2.43	Object		Object to the wording of the paragraph 2.43 which implies lack of growth in student numbers.					Suggests paragraph re wording to state: "Student numbers may rise over the Plan period taking into consideration the University's intention to target student growth in	The Council and University of Sunderland have signed a Statement of Common Ground (SD.8k), which proposed additional modifications to 2.43 (M2).	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

¹ ONS 2016 Mid-Year Population Estimate

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												the city's key growth areas (these being health sciences and wellbeing, advanced manufacturing and engineering and computing software and big data). Some students are increasingly demanding better quality self-contained accommodation, which 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. Whilst it is not anticipated that student numbers are expected to grow significantly over the Plan period, some students are increasingly demanding better quality self-contained accommodation, which has seen an increase in new purpose-built student accommodation within the city over recent years.		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. Whilst it is not anticipated that student numbers are expected to grow significantly over the Plan period, some students are increasingly demanding better quality self-contained accommodation, which has seen an increase in new purpose-built student accommodation within the city over recent years.
Nick	Horsley	Mineral Products Association	PD4270	Paragraph	2.76 and 2.77	Support with mods					Note that Paragraphs 2.76 and 2.77 help to set the scene for minerals within the city, but there is no introductory text provided within the minerals chapter.	The minerals chapter should include an introductory text to set the context of minerals policies in the plan.	Comment noted. It is not considered necessary to provide detailed introductory text to the Minerals Chapter, which would be inconsistent with the approach taken in other chapters.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4288	Paragraph	2.76	Support with mods					Paragraph 2.76 makes no reference to 5 existing infrastructure sites listed in Appendix 3. The LAA refers to marine aggregate and crushed rock imports. These should be referenced in Paragraph 2.76 also.	Link the paragraph to Appendix 3 but provide more detail as to the purpose of the minerals infrastructure in Appendix 3 by naming the sites and providing details of the infrastructure. Refer to marine and crushed rock imports in the paragraph/minerals chapter.	Comment noted. The Council consider that there is a sufficient level of detail already included in Paragraph 2.76. Appendix 3 has been updated to identify the 5 existing sites (M84).	Replaced map, adding more detailed key (see Appendix 1)
Nick	Horsley	Mineral Products Association	PD4302	Paragraph	2.77	Object					Paragraph 2.77 states that Sunderland is reliant on the import of minerals and the LAA identifies the Tyne and Wear jointly do not provide enough minerals to meet their needs. It is therefore questioned why Policy SP11 requires the developer to demonstrate need.	Review Policy SP11. There is a need established in the LAA for minerals established through the LAA and in Paragraph 2.77.	Comment noted. It is considered that the need for minerals will change over time; therefore the Plan should reflect this.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD148	Chapter	3	Support					Northumbrian Water strongly support the spatial vision 2033, in particular the network of green infrastructure, sustainable design and the strive to reduce impacts of flooding. Northumbrian Water support Strategic Priority 13.	No modification proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Skinner		PD239	Chapter	3	Object					Objects to the Plan on the grounds that consultation was	Development should be focussed on brownfield sites and	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt	The Council considers there have been no soundness or legal

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									inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.			inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.	be for bungalows and affordable housing, not multi-storey units and executive housing. Basic facilities should be maintained at Seaburn and public transport links improved. Vaux site should be used to provide a walking and cycling link from the city centre to the harbour, not offices. The affordable housing requirement should be raised to 50% instead of 15%.	boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement. Further comments relating to Seaburn are deemed non-strategic and can be further examined in the Allocations & Designations DPD.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD3901	Chapter	3	Support with mods						Generally support the Spatial Vision but would like bullet point 8 to be amended to include quantity and demands.	Amend bullet point 8 to include quantity and demands.	The Council propose an additional modification to spatial vision to address this representation (M5).	Of the types, sizes and tenures that meet the needs and demands of existing and future communities;
KARBON HOMES			PD3380	Chapter	3	Support with mods						Generally support the vision, but would like specific reference to affordable housing to be included in the eighth bullet. Strongly support Strategic Priority 4.	Include reference to affordable housing within the eighth bullet of the vision.	The Council propose an additional modification to spatial vision to address this representation (M4).	Offers a mix of good quality housing, both market and affordable of the types, sizes and tenures...
John	Tumman	Sunderland Civic Society	PD851	Paragraph	3.2	Object		Considers the Spatial Vision at paragraph 3.2 is not positively prepared. In relation to the point which sets out 'a population of around 290,000'.					Suggest a population of 283,000 persons as set out in representation to policy SP1.1 i	The population figure set out within the vision is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2056	Chapter	3	Support						Support the Vision and Strategic Priorities 1 and 4 specifically.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD64	Paragraph	3.2	Support							No modifications proposed.	The Council considers the Vision to be sound. The Council and NHS Sunderland CCG have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WYNYARD HOMES			PD4691	Chapter	3	Support						Support the aspirations of the plan and accompanying Spatial Vision, particularly Spatial Priorities 1, 2 and 4.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD65	Paragraph	3.3	Support						Supports strategic priority 3 to promote healthy lifestyles. This priority will require additional health infrastructure which will need to be in part through the mitigation of health infrastructure impacts arising from proposed relevant development. Suggests a robust policy context within the Plan is needed to provide this.	Response to be read in conjunction with other responses by the respondent.	Support noted. Policy ID2 (1ii) makes provision for the mitigation of direct or cumulative impact of development on infrastructure and refers to the draft Planning Obligations SPD which makes specific to health infrastructure. The Council and NHS Sunderland CCG have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jenny	Gibbs	University of Sunderland	PD183	Paragraph	3.2	Support with mods			Supports the spatial vision with minor changes, to				Requests that para 3.2 Spatial Vision 2033 with the section	As set out in the Statement of Common Ground with the University (SD.8k), the vision is not in a	The Council considers there have been no soundness or legal

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		d							reflect previous iterations of the Draft Plan which successfully identified the University as a partner in launching and contributing towards the spatial vision for Sunderland to 2033.				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 rôle 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.	hierarchical order, it is in plan chapter order and as such both parties agree it does not need to be amended.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD209	Paragraph	Spatial Vision and Strategic Priorities	Support with mods						The EA support the spatial vision of the plan as 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. 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.	The vision 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.	The Council acknowledges the EAs support for the spatial vision. The Council do not consider any additional text on the importance of nature is required within the spatial vision and strategic priorities section of the CSDP. The importance of nature is set out in various parts of this section including the spatial vision itself. This is set out within the spatial vision which states that by 2033 Sunderland would have a network of green infrastructure, supporting and protecting the cities biodiversity and wildlife, whilst also improving access to green space for all. The spatial vision sets the following spatial priority for nature 'to protect and enhance the city's biodiversity, geological resource, countryside and landscapes whilst ensuring that all homes have good access to a range of interlinked green infrastructure'. This is set out in a Statement of Common Ground between the EA and the Council, where it is agreed that no change is necessary to the Plan (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD90	Paragraph	3.3	Support with mods				Built and Historic Environment		Historic England support the Strategic priorities, however suggest that the title is changed to Built and historic environment to encompass all element of the historic environment.	Rename Built and Historic Environment	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. This is agreed in the Statement of Common Ground between the Council and Historic England (SD.8k; modification reference M10).	Built and Historic Environment
Nick	Horsley	Mineral Products Association	PD4327	Paragraph	3.3	Object						It is not clear why the Policies identified for Strategic Priority 12 which is the minerals theme are all waste policies.	Update table to include correct policy references.	The Council propose an additional modification to the strategic priorities to address this representation (M12).	WWE6, WWE7, WWE9, WWE9, SP11, M1, M2, M3.
		M&G Real Estate	PD3597	Paragraph	3.3	Support with mods					Strategic Priority 6 as currently worded is not consistent with the NPPF and should include the word support to make it consistent.		Include the word support in Strategic Priority 6.	Comment noted. Strategic Priority 6 has been updated to ensure consistency with the NPPF (M9).	To improve support and improve the vitality and economic performance of the Urban Core and designated centres.
	Unknown	Harworth Estates	PD2014	Paragraph	3.3	Support						Support Strategic Priority 5.	No Modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3013	Figure	12	Object						Object to Key Diagram as it is blocky and gives no reference to individual settlements and doesn't show Greenfields. The incursion of the SSGA into the Green Belt cannot be justified as there are no exceptional circumstances.	No modifications proposed.	The Council notes this representation. Designations are included in the Policies Map in accordance with the NPPF. The SSGA does not propose any Green belt development.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD4839	Figure	12	Support with mods						Supports the spatial vision of the draft CSDP but considers that Figure 12 Key Diagram should be	Amend the key diagram at Middle Herrington.	The site (and therefore the change proposed to the key diagram) is not supported in light of both the impact to Green Belt purpose and the results of the Green Belt Boundary review.	The Council considers there have been no soundness or legal compliance issues raised by this

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											amended to revise the Green Belt to the east of the A19 adjacent to Middle Herrington, as detailed under our response to Policy NE6.		There remains a moderate overall adverse impact to Green Belt purpose in terms of checking unrestricted sprawl and in safeguarding countryside from encroachment (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 147, 169 and 171). This area provides significant support to the Green Belt gap between Houghton and Sunderland, most critically between the area between West Herrington and Middle Herrington. The Green Belt Boundary Review (p35-36) also recommends that there should be no change to the Green Belt boundary, stating that "The existing boundary on the western edge of Grindon, south to Thorney Close, running south following the built-up area at Middle Herrington and bounding West Park - provides a logical and defensible boundary and there is no justification for making strategic amendments to this part of Sunderland's Green Belt boundary in our assessment." There are further significant issues that affect deliverability of the 3 sites put forward, including the immediate impact to 2 Scheduled Ancient Monuments, suitable access into the sites, impact to a SSSI, impact in parts to flooding, to historic ridge and furrow and to exposure with the A19.	representation which require modifications to the Plan. Therefore no modifications are proposed.
Olwyn, Acklam, PD8209 Christine, Alder, PD8342 Jon, Almond, PD8365 Mary, Ashcroft, PD8345 R, Ashcroft, PD8346 Jasen, Balderson, PD8224 Yvonne, Barclay, PD8265 Tony, Barry, PD8267 Pauline, Beckinsale, PD8406 Terish, Bewick, PD8307 Malcolm, Bond, PD8354 Sarah, Bradley, PD8355 Anne, Brown, PD8301 Peter, Burdus, PD8305 Anne, Burdus, PD8306 Jill, Carroll, PD8363 Jason, Carroll, PD8364 Vera, Chisman, PD8196 Janef, Colclough, PD8348 Carol, Cutts, PD8326 David, Cutts, PD8333 Allo, Daley, PD8308 Anthony, Derbyshire, PD8272 John, Devine, PD8197 Alison, Devine, PD8199 Martin, Dixon, PD8338 David, Donaghey, PD8184 Janet, Doran, PD8264 Derek, Dunn, PD8179 Gavin, Elliott, PD8334 David, Fisher, PD8186 Marilyn, Ganley, PD8181 Yvonne, Gray, PD8182 Pauline, Green, PD8337 Graham, Hall, PD8309 Wendy, Hannah, PD8183 Michael, Hartnack, PD8341 James, Henderson, PD8262 Muriel, Heptinstall, PD8207 Shirley, Hetherington, PD8347 Keith, Hetherington, PD8349 Allison, Hicks, PD8185 Frank, Hunter, PD8180 Graham, Hurst, PD8359 Dawn, Hurst, PD8358 Tobias, Hurst, PD8247 Imogen, Hurst, PD8254 Ken, Kilbride, PD8387 D, Martin, PD8269 Michelle, Matlock, PD8187 Charlotte, Matlock, PD8194 Darren, Matlock, PD8210 Tania, McGhie, PD8204 Gill, McIntosh, PD8371 Dorothy, Miller, PD8282 Jackie, Moon, PD8201 P, Nelson, PD8279 Tonya, Owen, PD8222 Andrew, Parkin, PD8299 Jeroen, Pichal, PD8484 Ian, Porter, PD8302 Diane, Porter, PD8304 Helen, Precious, PD8173 Dave, Prosser, PD8397 William, Riley, PD8263 Clair, Roper, PD8335			Chapter 4	Object	Aspects of the Plan break the law, including EU habitats directive and the Equalities Act.					Aspects of the Plan break the law, including EU habitats directive and the Equalities Act.	The Plan should be withdrawn. The housing and spatial strategy are flawed and cannot be remedied.	The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations (2012, as amended) and the guidance on plan-making set out in the National Planning Policy Framework (NPPF) (2012). The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the Council followed in engaging and consulting with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council worked closely with all statutory bodies, including Natural England, in producing the CSDP and selecting housing growth area sites. The CSDP complies with all relevant national and international regulations with regard to plan-making. The Council has set out how the Plan complies with the Equalities Act in the Equality Analysis for Core Strategy and Development Plan (2018). The impact of the CSDP on the nature conservation interests of sites designated under the Habitats and Wild Birds Directives and the effect on the integrity of any designated sites of European importance, i.e. Special Areas of Conservation, Special Protection Areas and Ramsar sites is set out in the Report to inform Habitats Regulations Assessment (2018). Further explanation of the consultation and public engagement process is set out in the Core Strategy and Development Plan Consultation Statement (November 2018). The NPPF (2012) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA) which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Geoffrey, Scott, PD8318 Michael, Simmons, PD8377 Carole, Simpson, PD8332 Barbara, Smith, PD8370 Ceili, Smyth-Bates, PD8172 Jennifer, Staward, PD8369 Joe, Stewart, PD8351 Pam, Stewart, PD8353 Valerie, Swaine, PD8325 Margaret, Taylor, PD8394 Paul, Thompson, PD8340 Brenda, Thornton, PD8300 John, Towner, PD8261 Tom, Turner, PD8168 Margaret, Walton, PD8266 Alan, Walton, PD8268 Carol, Ward, PD8216 Eileen, Wight, PD8360 Richard, Wight, PD8361 Melanie, Wight, PD8362 Michael, Wooler, PD8400 Andy, Wraith, PD8188													<p>based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of these sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p>		
S, Abrahams, PD5756 E, Adams, PD5045 Vicky, Adgar, PD4869 Dorrian, Affleck, PD2519 P, Aitken, PD1495 K, Aitken, PD847 George Edward, Alberts, PD3306 Paul, Aldridge, PD3427 Callum, Aldridge, PD1979 Dominic, Aldridge, PD1977 Alison, Aldridge, PD1998 Riley, Allen, PD4102 Olivia, Allen, PD4620 Susan, Alnwick, PD5206 Alan, Alnwick, PD5449 Alistair, Amour, PD5363 George, Anderson, PD3159 Caroline, Anderson, PD3194 Ava, Anderson, PD3129 George Noah, Anderson, PD3173 Gary, Anderson, PD3402 Carolyn, Anderson, PD2238 W, Ankers, PD2044 Paul, Appleton, PD5834 K H, Appleton, PD4103 Joan, Armstrong, PD4693 Clem, Armstrong, PD2104 Joan, Ashman, PD2964 A, Askew, PD2481 A, Askew, PD2560 Michelle, Aubert, PD4256 Carol, Baggaley, PD730 Paul, Balmer, PD1697 Tracy, Balmer, PD1695 Margaret, Banks, PD5918 Dan, Banning, PD2659 Matt, Banning, PD2480 Alan, Barber, PD2183 Ann, Barber, PD5726 Samantha, Barker, PD4166 Sandra, Barker, PD3941				Policy	SP1	Object		<p>Object to this policy on the grounds that the Council has not produced evidence to support building over 13,000 homes when the government requires 7610.</p>			<p>Object to this policy on the grounds that the Council has not produced evidence to support building over 13,000 homes when the government requires 7610.</p>	<p>Object to this policy on the grounds that the Council has not produced evidence to support building over 13,000 homes when the government requires 7610.</p>	No proposed modification.	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out</p>	The Council considers this policy to be sound.

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<p>Kenneth, Barker, PD4168 William, Barker, PD5856 Adam, Barnes, PD5174 Alison, Barnes, PD5737 E, Barrass, PD323 M, Barrass, PD328 A, Barrett, PD5452 Alice, Barron, PD4995 Amanda, Barron, PD4632 Sheila, Barron, PD4631 Linda, Barron, PD4735 Malcolm, Barron, PD4752 Amelia, Bateman, PD332 Deborah, Bateman, PD343 John, Bateman, PD2630 Jean, Bateman, PD2628 Peter, Beal, PD4949 Gillian, Beal, PD4935 H M, Bechkok, PD2424 AM, Bechkok, PD2455 Kimberly, Beckwith, PD3398 John, Bell, PD3102 Frances, Bell, PD3785 Sheila, Bell, PD3098 I, Bell, PD5408 Angela, Bell, PD1831 Edna, Bell, PD4360 Alan, Bell, PD4349 S, Bell, PD3794 Steve, Bell, PD2804 Catherine, Bell, PD1762 Nicci, Best, PD1666 Sally, Best, PD1072 Robert, Best, PD2991 Nick, Best, PD3595 Donna, Bishop, PD859 Christopher, Bishop, PD880 Wendy, Black, PD5722 George, Black, PD2116 Patricia, Black, PD1858 Deborah, Blackett, PD4970 David, Blackett, PD1468 Andrew, Blackett, PD1242 Emma, Blackett, PD3930 Fay, Blackie, PD5271 Michelle, Bland, PD2064 Simon, Bland, PD3187 Robert, Bloomfield, PD4374 Sharon, Bloomfield, PD4402 Lilian, Blue, PD1271 Frank, Blue, PD4708 Susan, Booker, PD1573 Howard, Booker, PD1557 Andrew D, Bosworth, PD336 Michelle, Bosworth, PD349 Angela, Bowe, PD3671 Kevin, Boyd, PD4903 Jennifer, Boyd, PD4104 Jennifer, Boyd, PD936 Nikki, Boyle, PD2939 A M, Bradford, PD2585 T E, Bradford, PD2569 Rebecca, Bradley, PD3673 Tilly, Brady, PD3139 Helen, Brady, PD5976 Stephen, Brady, PD3097 Marley, Brady, PD3947 Lee, Brebner, PD1918 Terry, Brereton, PD2118 Elisabeth, Brereton, PD1997 Kevin, Bricknall, PD356 Lynn, Bricknall, PD362 Mildred, Brodie, PD2439 ARTHUR, BRODIE, PD2417 Will, Brooke Lovell, PD5993 Evie, Brooke Lovell, PD5934 Carrie Ann, Brooke-Lovell, PD5801 M, Brooks, PD5072 Kristan, Brown, PD5672 Mary, Brown, PD5920 Katherine, Brown, PD2870 Malcolm, Brown, PD4161 Matthew, Brown, PD2836 Alexandra, Brown, PD2910 Steven, Brown, PD2822 T, Brown, PD5111 Dave, Brown, PD3987 Susan, Brown, PD5616 David, Brown, PD2429 Kenneth, Brunger, PD2057 Maurice, Bryson, PD3764 Jenna, Buglass, PD371 Gary, Bunt, PD5303 John, Burlinson, PD376 G, Burn, PD4364 F, Burn, PD4470 Carly, Burnett, PD877 Keith, Burnett, PD4063 Kathleen, Burns, PD990 Peter, Burns, PD3359 M, Burrows, PD2900 Paul, Burrows, PD2879</p>													<p>within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p>	

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<p>Jorja, Burrows, PD2926 Mitchell, Butler, PD2528 Stephen, Butler, PD389 Christine, Butler, PD382 Gary, Cairns, PD2917 Keith, Cameron, PD3333 Jacqueline, Cameron, PD3308 Ada, Carr, PD4517 Peter, Carr, PD4870 Vera, Carr, PD1836 W, Carrick, PD3185 Kathleen, Carroll, PD2799 Mary, Cartwright, PD1582 Peter, Cartwright, PD1482 Michael, Caruana, PD4129 Samantha, Carver, PD4220 Rachel, Chadwick, PD1272 Daniel, Chadwick, PD1273 Laura, Chambers, PD4262 Dorothy, Chandler, PD1916 Frank, Chandler, PD1879 Robert, Charlton, PD4766 Sarah, Charlton, PD4683 G, Chicken, PD2833 Ingrid, Chidgey, PD396 R W, Chilton, PD3828 Joan, Chilton, PD3882 Colin, Clark, PD2377 Maria, Clark, PD2430 M, Clark, PD2737 Brian, Clarke, PD404 Gina, Clarke, PD423 Victoria, Clayton, PD2121 Deborah, Clayton, PD1830 Ian, Clayton, PD2170 Lynn, Clayton, PD2063 Sophie, Cleasby, PD2477 A, Clements, PD2724 N D, Clements, PD2664 Marion, Coats, PD2383 Ron, Codling, PD3765 BM, Codling, PD3491 Alan, Coleclough, PD5089 Dorothy M, Coleclough, PD3569 James, Colledge, PD3073 Muriel, Colledge, PD3038 Alice, Colligan, PD4819 Elizabeth, Collins, PD2990 Laura, Condren, PD5422 Peter, Condren, PD5433 Olive, Cook, PD2604 Gemma, Cooke, PD4257 David, Cooper, PD2122 Evelyn, Cooper, PD1701 William, Cooper, PD3428 Carolyn J, Cooper, PD5325 Dave, Cooper, PD3228 Samuel, Cooper, PD428 Dawn, Cooper, PD3227 R L, Cooper, PD3439 Margaret, Copeland, PD2918 M, Corrigan, PD2042 Peter, Cottle, PD4926 Sara, Coulson, PD4538 Frances, Cowie, PD2840 Nicola, Cowie, PD1149 Niamh, Cowie, PD923 Hannah, Cowie, PD2471 Neil Edward, Cowie, PD2460 Melanie, Craig, PD5732 Dean, Craig, PD4765 Linda, Cryan, PD1089 J D, Cullen, PD3311 P W, Cullen, PD3287 P J, Cullen, PD2548 Beth, Cullen, PD5088 Richard, Curtis, PD5719 SARAH, CURTIS, PD5602 I, Dalby, PD1352 T, Dalby, PD1525 Anna, Dalby, PD4111 Steven, Dalby, PD3843 Imogen, Dalby, PD3868 Charlotte Elizabeth, Dalby, PD4117 M, Dawson, PD2951 A, Dawson, PD6018 Violet, Denham, PD438 Len, Denham, PD433 Dean, Derbyshire, PD5448 Joe, Devannney, PD449 Angela, Devannney, PD443 Jonathan, Dewart, PD2012 Bill, Dick, PD454 Christine, Dick, PD460 Ann, Dinning, PD5157 Alan, Dinning, PD5028 Sam, Dinsley, PD1556 Susan, Dinsley, PD1534 Shaun, Dinsley, PD1506 Brenda, Dodd, PD5917 E, Dodds, PD5374 J, Dodds, PD1629</p>														

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<p>John, Donnison, PD4928 Angela, Dover, PD5798 Keith, Dover, PD5793 John, Dowson, PD4260 Kristopher, Drummond, PD5788 Theo, Drummond, PD4668 Oliver, Drummond, PD4586 Kelly, Dryden, PD3539 Antony, Dryden, PD3692 Coel, Dryden, PD3695 Rhys, Dryden, PD3797 Katie, Dunbar, PD465 Kevin, Dunn, PD5101 Brian, Dunn, PD5673 Denise, Dunn, PD5641 Robert M, Edgar, PD3348 Patricia M, Edgar, PD3301 Vicki, Edmunds, PD4329 Janine, Edworthy, PD3188 Ian, Edworthy, PD5235 Bridget, Edworthy, PD3041 Miranda, Edworthy, PD3230 Paul, Ehrhardt, PD2289 Dianne, Ellwood, PD3099 William, Evans, PD5512 Joan, Evans, PD2541 Deborah, Ewart, PD4629 Kate, Ewart, PD5142 Stephen, Ewart, PD4628 Eleanor, Ewart, PD5155 James, Ewing, PD4370 Edward, Failles, PD1261 Maureen, Failles, PD1418 Amy, Falcus, PD3618 Craig, Falcus, PD3506 K, Faulkner, PD2688 N J, Faulkner, PD2713 Stephen, Fay, PD3837 Pauline, Fenwick, PD950 Colin, Fenwick, PD1052 David Alan, Fenwick, PD1268 Lynn, Fenwick, PD1321 Ronald, Ferguson, PD2117 E, Fife, PD4855 Amy, Fife, PD4904 Grahame, Fife, PD4905 Mark R, Fife, PD2431 Julie, Fife, PD2593 Adam, Finch, PD4800 Terry, Firman, PD1079 James Donnison, Fletcher, PD1144 O, Fletcher, PD1028 D, Flinn, PD5978 C A, Flinn, PD5911 R, Florance, PD1449 Heather, Florance, PD5728 Neil, Foggin, PD4771 Sandra, Foggin, PD2239 DW, Foggin, PD2211 Jacquelin, Foggin, PD4868 Brenda, Footé, PD3898 Richard, Foreman, PD5221 Jeannette, Forrester, PD5916 Steven, Forster, PD5791 J, Forster, PD2500 Sonia, Forster, PD3802 David, Forster, PD3931 Heather, Forster, PD471 Janine, Forster, PD1539 Elsie, Foster, PD3793 Elaine, Fothergill, PD4559 Stacie, Fothergill, PD4516 Cliff, Fothergill, PD4627 Hazel, Framingham, PD477 Heather, Francios, PD4515 Kenneth, Francios, PD4577 Isabel, Franklin, PD5270 Mark, Franklin, PD5109 Peter, Franklin, PD3982 M, Freeman, PD1914 JG, French, PD823 V, French, PD843 P, Gale, PD5977 Deborah, Gallagher, PD1121 John, Gallagher, PD2204 Tom, Gallagher, PD2339 John, Gallagher (Senior), PD2311 Katrina, Garnett, PD3694, Linda, Garnett, PD3040, Ronald, Garnett, PD2638, S, Garrett, PD2559, D, Garrett, PD1631, Craig, Gartland, PD3921, Emma, Gatens, PD1659, Mark, Gatens, PD1626, James, Gatens, PD2338, Amelia, Gatens, PD2138, Dawn, Gauld, PD4200, Chris, Gibson, PD4225, Ravender, Gill, PD3514, Zac, Gillbanks, PD5660, Ann Marie, Gillbanks, PD5560,</p>														

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<p> Julie, Giloney, PD4420, M E, Glaister, PD2376, Lesley, Godfrey, PD5282, Julie, Goding, PD4280, Keeley, Gordon, PD482, Phil, Gordon, PD488, Christine, Goss, PD4469, Sarah, Gough, PD3718, David, Grady, PD3238, Janice, Graham, PD493, Colin, Gransbury, PD2210, Irene, Gransbury, PD2209, Carl John, Grant, PD500, Margaret Ann, Grant, PD505, Peter Alexander, Grant, PD5173, Ann Mildred, Grant, PD2906, Ronald Malcolm, Grant, PD2834, Paul, Gray, PD2266, Chris, Green, PD1206, Jean, Green, PD3496, Philip, Greenup, PD1949, Catherine, Greenup, PD1950, Kate, Gregory, PD5534, Ben, Gregory, PD5599, Josh, Grey, PD5460, Stuart, Griffiths, PD4312, Lucy, Griffiths, PD4513, Claire, Guy, PD4710, Susan, Hall, PD1405, Adam, Hall, PD5046, Stephen, Hall, PD4388, Roslyn, Hall, PD4423, Julie, Hall, PD2660, Jonathan, Hall, PD1900, Maureen, Hamilton, PD1344, Elaine, Hamilton, PD1343, Valerie, Hancock, PD2394, John, Hancock, PD5168, Joanna, Hand, PD515, Christopher, Hand, PD510, Denise, Hannan, PD520, Jake, Hannan, PD1917, Mark, Hannan, PD1796, Paul, Hanson, PD3206, Louise, Hanson, PD3252, Michael, Harding, PD5237, Michael, Harding, PD5236, Stuart, Harding, PD2413, Sophie, Harding, PD2286, Emma, Hardy, PD2658, Angela, Hardy, PD2415, Adam, Harper, PD2215, Lisa, Harris, PD3551, Ian, Harris, PD3552, Paul, Harris, PD2099, Anna Marie, Harris, PD3550, Gillien, Harris, PD1819, Janet, Harrison, PD2905, Andrew, Hartley, PD3467, Naomi, Hartley, PD3437, Aurora, Hartley-Hewitson, PD4997, Lynn, Hartridge, PD3372, Allen, Hartridge, PD1746, Demi, Hawyes, PD526, Margaret, Haywood, PD5083, Nigel, Hems, PD4680, Gemma, Henderson, PD3808, E, Henderson, PD3331, K, Hepburn, PD3915, Wendy, Hewitson, PD3408, Kasia, Heywood, PD2192, Philip, Higgins, PD4786, David, Higgins, PD3770, Pauline, Higgins, PD3743, Geoffrey, Higgins, PD3729, R, Hillier, PD1111, E, Hillier, PD3241, Karen, Hills, PD3071, Kenneth, Hills, PD3229, Michael, Hills, PD2110, Caroline, Hills, PD3079, Michelle, Hills, PD2329, Callum, Hills, PD2282, Andy, Hird, PD3058, Ruth, Hirst, PD4684, Margaret, Hodgson, PD1340, Elizabeth, Hogg, PD4077, Michael, Hogg, PD5090, Paris, Holland, PD5730, Janice, Holmes, PD4583, Rhiannon, Holmes, PD4313, Trevor, Holmes, PD4314, Bill, Holmes, PD5461, S M, Holt, PD1263, Allen, Hope, PD1234, Ryan, Hope, PD2627, Andrea, Hope, PD5501, Sarah, Horne, PD1517, Elonor, Horne, PD2510, Joyce, Horne, PD1686, Gary, Horne, PD3438, David, Horrigan, PD2962, </p>														

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Sarah, Horrigan, PD2788, Jane, Horrigan, PD2786, Keith, Horrigan, PD2963, Norma, Houghton, PD3186, Stephen, Houghton, PD1740, Amelia, Hudson, PD2993, Stephen, Hudson, PD3613, Isabella, Hudson Walker, PD533 Marc, Hughes, PD8313, Nicola, Hurst, PD1761, Jess, Illingworth, PD2617, David, Ingram, PD4026, Sue, Ingram, PD4006, E, Irwin, PD2416, Robert, Jackson, PD4467, Donna, Jackson, PD4394, Stella, Jacques, PD649, W, Jacques, PD2592, Mark, Jahn, PD1999, Janet, Jamieson, PD2544, Norman, Jamieson, PD2543, M A, Jennings, PD1878, John, Jennings, PD5632, J, Jeruskau, PD4273, L, Jobling, PD1088, Alma, Jobling, PD3500, D, Jobling, PD1086, Peter, Jobling, PD4479, Gavin, Johnson, PD5023, Robert, Johnson, PD5723, Mavis, Johnson, PD2665, Catherine, Johnson, PD4275, Relia, Jonas, PD5955, SA, Jones, PD5852, L, Jones, PD5724, Jensen, Jones, PD3538, Elliot, Jones, PD3594, Ann Lorraine, Jordison, PD5967, Sarah, Jordison, PD3985, Brian, Jordison, PD3984, Kristian, Judge, PD538, Linda, Judge, PD543, Dennis, Judge, PD5376, Gregory, Kaszefko, PD4596, Suzie, Kaszefko, PD4888, Surena, Kaur, PD3475, Anisha, Kaur, PD3452, Francesca, Keith, PD553, Alexander, Keith, PD548, Tony, Kelly, PD5180, Claire, Kelly, PD1727, Ronan, Kenny, PD2561, Diana, Kenny, PD1178, Lisa, Kimber, PD2237, Sean, Klein, PD5502, Dennis, Lambton, PD5194, Christopher, Lane, PD4971, Caroline, Lane, PD4866, Joanne, Langley, PD5257, David, Langley, PD4793, Zack, Langley, PD5385, Katie, Langley, PD5879, Abbie, Langley, PD1320, Will, Langley, PD1331, Beth, Lawrence, PD2073, Lyn, Laws, PD3441, Victoria, Laws, PD4551, David, Leach, PD4568, Audrey, Leach, PD5734, Vivienne, Lee, PD4090, M, Lewins, PD4767, W, Lewins, PD4768, Joan, Liddle, PD3969, Wendy, Lindsay, PD4167, Joanne, Lisgo, PD2396, Richard, Littlejohn, PD4690, M, Livingstone, PD2591, Michele, Llanaez, PD5950, Dan, Llanaez, PD5054, Olivia, Llanaez, PD5052, Danielle, Llanaez, PD4959, Amanda, Llanaez, PD4957, Morgan, Llanaez, PD4703, Annie, Loadman, PD3599, Alison Jane, Logan, PD5796, Stuart, Logan, PD5677, Annabel, Logan, PD5628, Rachel, Luke, PD3704, Stephen, Luke, PD3679, Richard, Lumsdon, PD5571, Gemma, Lumsdon, PD5540, Peter, Lynn, PD1381, Carol, Lynn, PD1417, Louise, Lynn, PD3598, Helen, MacKay, PD558, Frank, Maghie, PD564, Stephanie, Mallam, PD4325, Ann, Manning, PD5033, Vahik, Mardirossian, PD1018, Emily Jane, Marriner, PD570, Amy, Marshall, PD1528, Elizabeth, Martin, PD3158,														

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<p>Conor, Nesbitt, PD2696, Stephen, Nesbitt, PD2697, Danielle, Nesbitt, PD5892, Margaret, Nesbitt, PD3182, R, Neville, PD5557, C, Neville, PD5601, Sheila, Nuttall, PD3275, Dennis, Nuttall, PD3289, Lynda, O'Leary, PD4941, Debbie, Oliver, PD5314, S, Oliver, PD3028, Elizabeth, Oliver, PD3022, Eric, Oliver, PD2950, Gwenyth, Oliver, PD2948, Melissa, Oliver, PD3371, Kevin, O'Neill, PD3600, Kevin, O'Sullivan, PD594, Elizabeth, O'Sullivan, PD587, Alan, Oxley, PD3940, P, Panther, PD5513, Grahame, Parker, PD997, Catherine, Parker, PD1265, Keith, Parker, PD8517, Christopher, Parker, PD5172, Katie, Parker, PD5802, Fiona, Parker, PD2844, M, Parkin, PD3181, George, Parkin, PD3180, Susan, Patrick, PD8294, R, Patterson, PD1537, Daniel, Patterson, PD1180, Andrew, Patterson, PD1676, Matthew, Patterson, PD1232, Victoria, Patterson, PD1148, W A, Pattison, PD1798, E.D, Pattison, PD1797, Malachi, Payne, PD4776, Michael, Payne, PD4740, Talia, Payne, PD4191, A H, Pearce, PD3356, Joan, Pearson, PD3307, Jim, Pearson, PD3472, Amanda, Pearson, PD3593, Patricia, Peele, PD3449, Chris, Pescod, PD600, Adrian, Pickering, PD5110, Janet, Pickering, PD607, K, Pickup, PD5494, David, Pickup, PD5585, Thomas, Pickup, PD5572, Dale, Pilkington-Smith, PD1175, Sheila, Platt, PD3842, Judith, Platt, PD2363, Jeffrey, Platt, PD3876, Karen, Pooley, PD5381, Keian, Pooley, PD5942, Tazmin, Pooley, PD5824, Ryan, Pooley, PD5779, Dillion, Pooley, PD5736, John, Pooley, PD5703, Tarryn, Pooley, PD3927, William, Portsmouth, PD4994, Mark William, Portsmouth, PD5000, George, Postle, PD4508, L, Potter, PD3074, S, Potter, PD3107, N, Potter, PD5554, Samantha, Potts, PD4597, Shauni, Pringle, PD2305, Janice, Pringle, PD2303, Tracey, Pyburn, PD621, Luke, Pylan, PD614, Jon, Quine, PD5176, Robert, Quinn, PD2725, Helen, Quinn, PD2843, Margaret, Quinn, PD3484, L, Rae, PD630, D, Rae, PD5368, Nicola, Rae, PD1877, Ian, Ramsay, PD3649, Wendy, Ramsey, PD640, Jacob, Ramshaw, PD5787, Rosie, Ramshaw, PD5995, Joanne, Ramshaw, PD5968, James, Ramshaw, PD3169, Rachel, Ray, PD5886, James, Ray, PD5803, K, Reay, PD1526, Laurence, Reay, PD963, Simon, Reay, PD947, Christopher, Reay, PD2250, Janet, Regan, PD2346, Lisa, Reid, PD1347, Craig, Reid, PD5040, Anne, Rennie, PD660, Michael, Rennie, PD665, Stephen, Reveley, PD774, Julie, Reveley, PD3094, Alexia, Reynolds, PD1330, Jorge, Reynolds, PD1328, Gillian, Reynolds, PD1190, Anthony, Reynolds, PD1189,</p>														

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<p>Amelia, Reynolds, PD1188, Malcolm, Richardson, PD1613, Claire, Richardson, PD969, Susan, Richardson, PD1649, J, Richardson, PD1630, Katrina, Ridley, PD685, Christopher, Ridley, PD672, Julie, Ridley, PD5273, Graeme, Ridley, PD2284, Catherine, Ritchie, PD699, Robin, Ritzema, PD3378, Linda, Ritzema, PD3377, Philip, Ritzema, PD4502, William, Robertson Walker, PD736 Ruth, Robinson, PD3990, Maureen, Robinson, PD4557, Keith, Robinson, PD4476, Kate, Robinson, PD1951, Callum, Robinson, PD5167, Hannah, Robinson, PD4795, Nicole, Robinson, PD5375, John, Robinson, PD2773, Maureen, Robinson, PD2775, Will, Robinson, PD2774, Simon, Robinson, PD725, Peter, Robinson, PD712, Evan, Robinson, PD4958, Amie, Robinson, PD4300, Sharon, Robinson, PD8327, Yvonne, Robson, PD4299, Dorothy, Robson, PD2285, Owen, Robson, PD5877, Les, Robson, PD1408, Luke, Robson, PD5123, Jane, Robson, PD5778, Gordon Alan, Robson, PD5883, Lyndsey, Robson, PD5881, T, Robson, PD4186, Kenneth, Robson, PD2358, Rachael, Rodger, PD2002, Julie, Rodger, PD2001, S, Rodger, PD2000, Lindsey, Ross, PD2168, Erlinda, Ross, PD2169, Lucy, Rouse, PD1915, Charlie, Rouse, PD1978, Millie, Rouse, PD1881, Paul, Routledge, PD3415, Brian, Rowntree, PD3754, P, Rudd, PD5092, Steven, Sambers, PD4231, Joss, Savory, PD3127, Angela, Savory, PD3164, Jason, Sayers, PD4352, T, Scott, PD5584, M, Scott, PD5735, Bryan, Scott, PD2193, Madeleine, Scott-Gray, PD2605, Irene, Searle, PD812, Ronnie, Senior, PD1588, Betty, Senior, PD1589, Pauline, Shaftoe, PD5922, Chris, Shaftoe, PD5387, Tom, Shaftoe, PD1470, Suzanne, Shaftoe, PD1471, Kevin, Sheppard, PD1996, Mason, Shotton, PD2410, Tristan, Simpson, PD5799, June, Simpson, PD3647, George, Simpson, PD4662, Debbie, Simpson, PD4663, Ronald John, Simpson, PD753, Chris, Simpson, PD745, Amer, Singh, PD3492, Greg, Skeoch, PD5634, Rachel, Skeoch, PD5635, Joan, Slowther, PD4682, Kenneth, Slowther, PD5952, Doreen, Smith, PD1789, Kelly, Smith, PD6184, Jordan, Smith, PD6157, John, Smith, PD1382, Joan, Smith, PD1592, Charlotte, Smith, PD3429, Raymond, Smith, PD993, Anita, Smith, PD1248, John, Smith, PD1282, Morris, Smith, PD1788, Susan, Smith, PD1474, Ian, Stafford, PD4242, June, Stafford, PD4268, Jessica, Stafford, PD5166, Alan, Stavers, PD4382, Jayne, Steanson, PD4633, Anna, Steanson, PD4474, Olivia, Steanson, PD4565, Mark, Steanson, PD4554, Marjorie, Stephenson, PD3942, Carole, Stephenson, PD1882, Peter, Sterling, PD3542, A, Stevens, PD2009, Alan, Stoddart, PD761,</p>														

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Alison, Stoddart, PD5238, Irene, Stoker, PD2240, H, Stoker, PD2287, Catherine, Stokoe, PD2907, Craig, Stokoe, PD3540, Dan, Stokoe, PD3799, Matthew, Stubbs, PD4071, T, Suchecki, PD5790, David, Sunley, PD2062, Lynda, Sutton, PD4153, Paul, Sutton, PD4142, Deborah, Swaddle, PD922, Michelle, Sweeney, PD769, P, Sweeney, PD1165, Barry, Taylor, PD3357, Gordon, Taylor, PD3620, Ben, Taylor, PD3648, G, Taylor, PD797, B, Taylor, PD783, Linsey, Taylor, PD3554, Greg, Taylor, PD5393, Mollie, Taylor, PD3425, David, Taylor, PD3533, Joshua, Taylor, PD3589, Jean, Taylor, PD5274, Lynn, Taylor, PD3658, Neil, Taylor, PD1959, Joyce, Taylor, PD1941, Steve C, Templeman, PD4510, Martin, Terry, PD4998, Joyce, Tetlow, PD5275, Kathryn, Tew, PD3340, F J, Thirlaway, PD2352, I, Thirlaway, PD2354, Jo, Thomas, PD8523, Jeremy, Thomas, PD1123, Steve, Thomas, PD3512, David, Thompson, PD1767, Delice V, Thompson, PD1876, Jack, Thompson, PD4050, Angela, Thompson, PD1768, Daniel, Thompson, PD4992, Andrew, Thompson, PD5383, Claire, Thompson, PD5450, Gladys, Thompson, PD3095, Allan, Thompson, PD1733, Chris, Thomson, PD4851, Maxine, Thornley, PD5334, Heather, Thornley, PD5412, Alex, Thornley, PD5535, Leanne, Tiffen, PD2985, Eva, Tiffen, PD1062, Alan, Tiffen, PD1031, Janette, Tiffen, PD2956, Terence, Tiffen, PD3034, Darren, Tiffen, PD3752, David, Todd, PD4201, James, Tracey, PD1971, Claire, Treadwell, PD3840, Sam, Treadwell, PD3839, John, Trewhitt, PD4879, M, Trewhitt, PD1699, Leslie, Trotter, PD2302, Lewis, Tuff, PD4609, Dianne, Tully, PD3997, John, Turnbull, PD5822, Clare, Turnbull, PD811, J H, Turnbull, PD1639, Emma, Turnbull, PD2527, Maureen, Turnbull, PD1637, Tracy, Turnbull, PD5327, Malcolm, Turnbull, PD4224, M, Turner, PD1406, Erin, Urwin, PD836, Nancy, Urwin, PD4447, Christine, Urwin, PD2375, Ray, Urwin, PD2283, Gemma, Venus, PD1389, Martin, Venus, PD817, Carole, Vorley, PD793, Pauline, Waite, PD5921, Neil, Waite, PD4770, Jill, Waite, PD5603, Michael, Wales, PD4390, Daniel, Wales, PD4446, Debbie Jane, Walker, PD848, Florence, Walker, PD1097, Amanda, Wallace, PD741, William James, Ward, PD980, Christina, Ward, PD3004, James, Warne, PD3240, Lynne, Warne, PD2832, Maureen, Watson, PD4832, H, Watson, PD1145, J, Watson, PD1071, Danielle, Watson, PD862, Joanne, Watson, PD878, Paul, Watson, PD899, Julie, Watson, PD4772, Laura, Watson, PD5462, Martin, Watson, PD5323, J T, Watson, PD4595,														

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<p>David, Watson, PD6000, Veronica, Watson, PD5895, Peter, Watson, PD5451, P. Weatherburn, PD3889, Malcolm, Weatherburn, PD4490, Xenia, Webster, PD1787, Mark, Weddle, PD911, Julie, Weedy, PD1191, Helen, Weir, PD4105, David, Weir, PD4089, Eileen, West, PD2896, R A, White, PD1112, Ann, White, PD1122, D, Whitfield, PD1458, F, Whitfield, PD1444, Maureen, Whittaker, PD1013, Matty, Wild, PD5885, K, Wilkinson, PD713, D, Wilkinson, PD715, G, Wilkinson, PD2756, Helen, Wilkinson, PD2733, M, Wilkinson, PD683, J, Wilkinson, PD670, Eleanor, Williams, PD3841, Phillip, Williams, PD5002, Lucy, Williams, PD4000, Carl, Williams, PD4681, L, Williams, PD4512, Lee, Williams, PD916, Thomas, Williams, PD2123, Sara, Williams, PD924, Sylvia, Williams, PD2835, Brian, Williams, PD2772, Laura, Williams, PD5662, Brenda, Wilson, PD5997, Katie, Wilson, PD5875, Oliver, Wilson, PD4967, Deborah, Wilson, PD5636, James, Wilson, PD5550, Melanie, Wilson, PD635, Clare, Wood, PD4016, CH, Wood, PD1087, Dale Royce, Wood, PD5500, M, Wood, PD940, J, Wood, PD2505, Ciaran, Wood, PD3875, Madaline, Wood, PD3862, M, Wood, PD3696, Michelle, Wood, PD3379, Stephen, Woodbridge, PD3282, Lucy, Woolley, PD2657, David, Woolley, PD2606, S, Wright, PD4326, Nicola, Wylde, PD2851, Barry, Wylde, PD3100, Gary, Yeaman, PD4389, Olivia, Yeaman, PD5229, Miiley, Yeaman, PD4311, Danielle, Yeoman, PD3795, John, Young, PD5125, Helen, Young, PD4910,</p>														
John	Tumman	Sunderland Civic Society	PD723	Policy	SP1	Object					<p>Considers that policy SP1.1 i is not justified as adopted UDP set a similar aim to the CSDP in terms of population retention/growth through policies for housing and economy and that failed. Adjacent authorities are also aiming for population growth or stability and Sunderland's plan may be in competition with rather than complementary to adjacent authority's aspirations. No indication that this has been taken into account in the SHMA, as such number of homes over optimistic. Targeted annual completion rate is 30% above baseline requirement and no evidence to suggest this housing demand will manifest. Allocating more land will not necessarily draw more people in. Concerns over the reliability of</p>	<p>Downward revision in the number of new house proposed in policy SP1.1i from 13,410 to 10,225 dwellings.</p>	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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												utilising mid-year estimates, short-term trends to make long term projections. If the level of inward commuting was determined by a latent demand for housing not being met this would result in increased demand and rising house prices, of which house prices do not reflect. Concerns with the over-provision of housing land and an element of flexibility being built into the supply. Could further weaken a fragile housing market. Excessive development on periphery could result in difficulties in securing inner area regeneration. Unnecessary green belt allocations lead to urban sprawl. The competition between neighbouring authorities for a fixed population may lead to targets not being met. Suggest housing number of 10,225 which is current SHLAA provision. The 2024 review of the plan would be an opportune time to assess this revised housing target.		within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. Further justification is set out in the Compliance Statement. The Council considers this Policy to be sound.	
Raymond	Luke		PD410	Policy	SP1	Support						Agrees with Green Belt boundary changes to the east of Springwell village.	No proposed modifications.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5115	Policy	SP1	Object		Barratt David Wilson Homes (BDW) is concerned that the strategy does not address strategic priority 1 and therefore is internally inconsistent. BDW considered the most appropriate strategy is to designate Washington as a 'Principal Growth Settlement'. BDW fully support the ambitions of clustering the automotive sector, however there is insufficient housing focussed in Washington to take advantage of the economic growth ambitions generated by IAMP. BDW are promoting Washington Meadows as a site which would enable works to live close to job and access by foot or cycle rather than the car. BDW consider that the housing requirement is incorrect as assumption on the number of direct jobs ignores multiplier jobs for IAMP and the Council has only taken into consideration 72% of	Barratt David Wilson Homes (BDW) is concerned that the strategy does not address strategic priority 1 and therefore is internally inconsistent. BDW considered the most appropriate strategy is to designate Washington as a 'Principal Growth Settlement'. BDW fully support the ambitions of clustering the automotive sector, however there is insufficient housing focussed in Washington to take advantage of the economic growth ambitions generated by IAMP. BDW are promoting Washington Meadows as a site which would enable works to live close to job and access by foot or cycle rather than the car. BDW consider that the housing requirement is incorrect as assumption on the number of direct jobs ignores multiplier jobs for IAMP and the Council has only taken into consideration 72% of		Barratt David Wilson Homes (BDW) is concerned that the strategy does not address strategic priority 1 and therefore is internally inconsistent. BDW considered the most appropriate strategy is to designate Washington as a 'Principal Growth Settlement'. BDW fully support the ambitions of clustering the automotive sector, however there is insufficient housing focussed in Washington to take advantage of the economic growth ambitions generated by IAMP. BDW are promoting Washington Meadows as a site which would enable works to live close to job and access by foot or cycle rather than the car. BDW consider that the housing requirement is incorrect as assumption on the number of direct jobs ignores multiplier jobs for IAMP and the Council has only taken into consideration 72% of	Barratt David Wilson Homes (BDW) is concerned that the strategy does not address strategic priority 1 and therefore is internally inconsistent. BDW considered the most appropriate strategy is to designate Washington as a 'Principal Growth Settlement'. BDW fully support the ambitions of clustering the automotive sector, however there is insufficient housing focussed in Washington to take advantage of the economic growth ambitions generated by IAMP. BDW are promoting Washington Meadows as a site which would enable works to live close to job and access by foot or cycle rather than the car. BDW consider that the housing requirement is incorrect as assumption on the number of direct jobs ignores multiplier jobs for IAMP and the Council has only taken into consideration 72% of	Review the spatial strategy to maximise the benefits of Washington as an economic growth hub and allow the urban extension to the east of Washington. Increase the housing requirement by an additional 100 homes per annum and include a buffer of 20%. Reduce the SHLAA sites, and review the existing commitment to ensure they are deliverable. Review site allocation to ensure delivery rate are appropriate and site deliverable.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation which is contained within the SHMA Addendum 2018. The Housing requirement within the Plan already includes a significant uplift to support economic growth, including the IAMP. In addition, the Council is working closely with local colleges and Universities to ensure that local residents have the skills required to take advantage of the new job opportunities available on the IAMP. Further detail is provided in the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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							<p>the jobs from IAMP and this leave around a quarter unaccounted for (1300). BDW, has commissioned Regeneris to analyse the labour market. The report has concluded that there is little capacity in the existing workforce to support the jobs needed, this is part due to a declining working age population. The report concluded that around 5000 jobs have not been accounted for in the OAN evidence and therefore a further upward adjustment to the OAN of 1,760 should be included over the Plan period. The OAN calculation makes no adjustment for household representative rates. Furthermore, the SHMA highlights an annual imbalance of 542 affordable homes each year. BDW consider that the housing requirement does not reflect national guidance, BDW question the 10% buffer and would argue this should be increased to 20% in accordance with the Local Plan Expert Group Report. The Plan does not include a 10% lapse rate for site currently with Planning permission. The demolition rate should be increased as in recent years there has been losses over 2-300. There is no evidence to justify the windfall allowance. The baseline should be increased from 570 to 593 to be in accordance with the government guidance. BDW understand that none of the surrounding authorities have agreed to address the IAMP housing growth through DTC. Therefore Sunderland will have hidden housing needs which have not been addressed. BDW consider the scale of the housing requirement should increase to reflect the scale of economic growth proposed to support IAMP and therefore should be at least 100 dwellings extra per annum. BDW consider that the main risks to the housing delivery are slippage in the delivery of allocation, longer lead in time, reduced housing capacity on sites, sites no longer coming forward as result of viability from planning obligations, and</p>	<p>the jobs from IAMP and this leave around a quarter unaccounted for (1300). 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The report has concluded that there is little capacity in the existing workforce to support the jobs needed, this is part due to a declining working age population. The report concluded that around 5000 jobs have not been accounted for in the OAN evidence and therefore a further upward adjustment to the OAN of 1,760 should be included over the Plan period. The OAN calculation makes no adjustment for household representative rates. Furthermore, the SHMA highlights an annual imbalance of 542 affordable homes each year. BDW consider that the housing requirement does not reflect national guidance, BDW question the 10% buffer and would argue this should be increased to 20% in accordance with the Local Plan Expert Group Report. The Plan does not include a 10% lapse rate for site currently with Planning permission. The demolition rate should be increased as in recent years there has been losses over 2-300. There is no evidence to justify the windfall allowance. The baseline should be increased from 570 to 593 to be in accordance with the government guidance. BDW understand that none of the surrounding authorities have agreed to address the IAMP housing growth through DTC. Therefore Sunderland will have hidden housing needs which have not been addressed. BDW consider the scale of the housing requirement should increase to reflect the scale of economic growth proposed to support IAMP and therefore should be at least 100 dwellings extra per annum. BDW consider that the main risks to the housing delivery are slippage in the delivery of allocation, longer lead in time, reduced housing capacity on sites, sites no longer coming forward as result of viability from planning obligations, and</p>					

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								therefore a greater buffer should be applied. BDW are concerned that the SHLAA sites will not come forward, and have made this comment to the SHLAA working Group 2018. BDW consider that the Council should be more realistic in regards to the SHLAA. Sites without Planning Permission will not be yielding completions until 2021 and in accordance with the new NPPF, site that are deliverable should only be those with detailed planning permission, and only include those with outline or those which are allocated if there is clear evidence that completion will begin in 5 years.	therefore a greater buffer should be applied. BDW are concerned that the SHLAA sites will not come forward, and have made this comment to the SHLAA working Group 2018. BDW consider that the Council should be more realistic in regards to the SHLAA. Sites without Planning Permission will not be yielding completions until 2021 and in accordance with the new NPPF, site that are deliverable should only be those with detailed planning permission, and only include those with outline or those which are allocated if there is clear evidence that completion will begin in 5 years.		therefore a greater buffer should be applied. BDW are concerned that the SHLAA sites will not come forward, and have made this comment to the SHLAA working Group 2018. BDW consider that the Council should be more realistic in regards to the SHLAA. Sites without Planning Permission will not be yielding completions until 2021 and in accordance with the new NPPF, site that are deliverable should only be those with detailed planning permission, and only include those with outline or those which are allocated if there is clear evidence that completion will begin in 5 years.	therefore a greater buffer should be applied. BDW are concerned that the SHLAA sites will not come forward, and have made this comment to the SHLAA working Group 2018. BDW consider that the Council should be more realistic in regards to the SHLAA. Sites without Planning Permission will not be yielding completions until 2021 and in accordance with the new NPPF, site that are deliverable should only be those with detailed planning permission, and only include those with outline or those which are allocated if there is clear evidence that completion will begin in 5 years.			
Richard	Cowen	CPRE North East	PD1249	Policy	SP1	Object					Considered that there is a discrepancy in that the population is proposed for a 4% increase yet the housing stock is planned to rise by 11%.CPRE questions whether the 745 OAN figure is justified in light of Brexit, the 4% population growth and the Government standard method proposing 593 OAN. In relation to the Revised NPPF, it is considered that the Council has not demonstrated sufficient reason to justify it taking such a significantly different approach from the Standard Method.	Considered that there is a discrepancy in that the population is proposed for a 4% increase yet the housing stock is planned to rise by 11%.CPRE questions whether the 745 OAN figure is justified in light of Brexit, the 4% population growth and the Government standard method proposing 593 OAN. In relation to the Revised NPPF, it is considered that the Council has not demonstrated sufficient reason to justify it taking such a significantly different approach from the Standard Method.	The Council should adopt the Government's Standard Method for calculating the OAN.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Frances	Nicholson	Bellway Homes Ltd	PD732	Chapter	4	Object					Not all Housing Growth Areas appear to be justified taking into account the evidence base. Question the need for all of the Green Belt sites when alternative non-Green Belt sites may be suitable if a more robust method of assessment was followed in the Settlement Break Review, such as their clients' site at Sedgelych. Consider that if field boundaries were not used in the Settlement Break Review there is a high likelihood that the site at Sedgelych would have been identified as suitable for residential development. The smaller site identified would not extend further north or west than existing built development and adjacent housing site. Landscape and Visual Impact Assessment has been prepared which shows that through design the impact would be acceptable.	Not all Housing Growth Areas appear to be justified taking into account the evidence base. Question the need for all of the Green Belt sites when alternative non-Green Belt sites may be suitable if a more robust method of assessment was followed in the Settlement Break Review, such as their clients' site at Sedgelych. Consider that if field boundaries were not used in the Settlement Break Review there is a high likelihood that the site at Sedgelych would have been identified as suitable for residential development. The smaller site identified would not extend further north or west than existing built development and adjacent housing site. Landscape and Visual Impact Assessment has been prepared which shows that through design the impact would be acceptable.	Revise Settlement Break Review to follow proposed methodology so that all parcels of land are assessed for deletion prior to considering the extent of Green Belt releases for housing growth.	The justification for exceptional circumstances to release land from Green Belt is explained in the Council's 2018 Exceptional Circumstances paper. The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement (see Policy SP1).The Council does not support the site at Sedgelych due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. Although it is acknowledged that the proposed site has less of an impact than the whole of field parcel 2 would have (as shown in Chapter 8 of the 2018 Settlement Break Review), it is nevertheless considered that the impact to the Settlement Break would be significant, primarily in terms of the green infrastructure corridor which would be compromised, extending the narrowness of the corridor that exists between Dubmire and Burnside and reducing the openness of the corridor between Golf Course Road and the Sewage Works. Furthermore, the SHLAA highlights a number of additional issues that affect site suitability, including the proximity of ponds and protected wildlife sites, evidence of priority species in the area, a pylon crossing the site, coal	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												As housing supply forms part of the 'Exceptional Circumstances' case all non Green Belt land should be considered.		shafts that may require significant mitigation, as well as the site lying within a Critical Drainage Area and abounding Flood Zone 2. The scale of development in the area may also trigger the need for extensive infrastructure funding, particularly in relation to highways and schools.	
Adam	McVickers	Persimmon Homes (Durham)	PD3893	Chapter	4	Object						Disappointed that former Policy SS1 has been deleted. Recognise it is not necessary to repeat National Policy but would have provided helpful clarification for residential planning applications in absence of a 5 year supply.	Policy should be reinstated or additional text inserted in the Homes section to clarify the implications of the PFSD on the consideration of development proposals.	The Plan should be read as a whole. The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy and Policy SP6 The Coalfield) and its approach in the Homes Chapter (see Policy SP8 Housing Supply and Delivery) and in relation to Paragraph 6.9. It is not considered necessary to repeat National Policy so former Policy S11 was deemed surplus to requirements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4340	Policy	SP1	Object						Disappointed that minerals has not been included within the spatial strategy.	The local plan needs to take account of mineral needs. It is not clear how the Council intend to meet aggregate demand over the plan period.	The Plan should be read as a whole. The plan seeks to address the need for minerals through Chapter 13. Where necessary, site specific allocations will be made through the Allocations and Designations Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Mackings	Paul Mackings Consulting Ltd	PD2902	Policy	SP1	Object		Does not consider that exceptional circumstances exist to justify the release of Sites HGA1-4 and HGA6-11 from the Green Belt. The shortfall is around 177 dwellings which doesn't justify the release of enough land for 1200 dwellings from the Green Belt.	Does not consider that exceptional circumstances exist to justify the release of Sites HGA1-4 and HGA6-11 from the Green Belt. The shortfall is around 177 dwellings which doesn't justify the release of enough land for 1200 dwellings from the Green Belt. Not all sites in urban area have been exhausted, such as Hendon Paper Mill site.		Does not consider that exceptional circumstances exist to justify the release of Sites HGA1-4 and HGA6-11 from the Green Belt. The shortfall is around 177 dwellings which doesn't justify the release of enough land for 1200 dwellings from the Green Belt. Not all sites in urban area have been exhausted, such as Hendon Paper Mill site.	Does not consider that exceptional circumstances exist to justify the release of Sites HGA1-4 and HGA6-11 from the Green Belt. The shortfall is around 177 dwellings which doesn't justify the release of enough land for 1200 dwellings from the Green Belt. Not all sites in urban area have been exhausted, such as Hendon Paper Mill site.	Reconsider the need to remove some or all of sites HGA1-4 and 6-11 from the Green Belt and allocate them for housing.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to be retained for employment purposes.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Bradley	Sunderland Green Party	PD4461	Policy	SP1	Object						Exceptional circumstances have not been justified for Green Belt incursion. The OAN is an inflated figure (weighted and using outdated methodology) and not justified, especially with latest population figures being low.	No modifications proposed.	The Council notes this representation. The Exceptional Circumstances to amend the Green Belt boundary are included in the Exceptional Circumstances Report which is included in the Submission Library. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3381	Chapter	4	Support						Generally support the spatial vision set out in pages 31-50.	No modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD236	Policy	SP1	Support with mods						Hellens Group consider that based on the Housing Need Report produced by Lichfields, there is a need for an additional 100-200 more dwelling per annum in Sunderland. This is because of additional population growth is required to deliver the strong growth prospects in Sunderland, particularly the IAMP. This evidence provided a strong justification for an increase in the housing requirement and additional allocations. Hellens	No proposed modification made.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council does not support the larger site allocation due to the impact on the Green Belt, associated noise issues from the recycling plant, proximity to a Scheduled Ancient Monument and to protected species and habitat. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												support the principle of Green Belt release in Sunderland and the exceptional circumstances case but would argue for additional land to be released west of Springwell.			
Paul	Dixon	Highways England	PD4804	Policy	SP1	Object			Highways England considers the Plan not to be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			Highways England considers the Plan not to be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential.

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															<u>Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</u>
M	Marsden		PD414	Policy	SP1	Object						Considers overall housing numbers and green belt releases not to be justified based on using 2014 population projections rather than 2016, which show population growth has dropped. 2016 statistics also show a drop in immigration.	All statistics and projections should be based on 2016 ONS population projections to give an accurate baseline for a revised plan.	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. Further justification is set out within the Compliance Statement.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Regeneration & Property Team		Sunderland City Council	PD3374	Policy	SP1	Support						In line with national policy, the Council has investigated all unimplemented site allocations in the UDP, as well as carrying out a Strategic Land	No modifications proposed.	Comment noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no

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												Review, Settlement Break Review, Greenspace Audit and Employment Land Review and identified all viable/sustainable residential sites, as set out in the SHLAA. There is still an identified shortfall to meet the SHMA and, having exhausted all other options, exceptional circumstances are justified for Green Belt incursion. Green Belt sites are in environmentally sustainable and accessible locations, and where the market demand is strong.			modifications are proposed.
Ray	Delaney		PD28	Policy	SP1	Object		Mr Delaney supports policy SP1(2)(v) to the extent that he supports the delivery of homes in the right location identified in the Local Plan. However objects to the amendments to the Green Belt boundary which does not exclude SHLAA site 464B. The Council has not justified why the site is no longer allocated in the CSDMP. The approach is not consistent with NPPF para 83. The site should not be left to come forwards as a windfall and should be allocated.	Mr Delaney supports policy SP1(2)(v) to the extent that he supports the delivery of homes in the right location identified in the Local Plan. However objects to the amendments to the Green Belt boundary which does not exclude SHLAA site 464B. The Council has not justified why the site is no longer allocated in the CSDMP. The approach is not consistent with NPPF para 83. The site should not be left to come forwards as a windfall and should be allocated.		Mr Delaney supports policy SP1(2)(v) to the extent that he supports the delivery of homes in the right location identified in the Local Plan. However objects to the amendments to the Green Belt boundary which does not exclude SHLAA site 464B. The Council has not justified why the site is no longer allocated in the CSDMP. The approach is not consistent with NPPF para 83. The site should not be left to come forwards as a windfall and should be allocated.	Mr Delaney supports policy SP1(2)(v) to the extent that he supports the delivery of homes in the right location identified in the Local Plan. However objects to the amendments to the Green Belt boundary which does not exclude SHLAA site 464B. The Council has not justified why the site is no longer allocated in the CSDMP. The approach is not consistent with NPPF para 83. The site should not be left to come forwards as a windfall and should be allocated.	Allocate SHLAA site 464B for residential development Add to SP1(2)(v), "and through the allocation of previously developed sites in the Green Belt for redevelopment".	Site 464B at Offerton is considered to constitute greenfield land whereas the previous assessment considered the site to be brownfield land. Supporting the removal of this site from the Green Belt would require major alteration to the city's Green Belt boundary (removing existing strong and durable boundaries), and such boundary alteration cannot be justified. It should be noted that the assessment in this addendum supersedes the assessment contained within the Green Belt Assessment Stage 1 Updated and Stage 2 (2017) in relation to this site. Furthermore, the Council states that it is not the role of the CSDP to repeat the NPPF, which provides detail regarding the use of previously developed land (brownfield land) within the Green Belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD165	Policy	SP1	Object					The policy is considered to be unsound as it is not in accordance with the NPPF as it does not demonstrate exceptional circumstances to amend the Green Belt boundary. All alternative options have been considered. An alternative site south of Houghton le Spring should be allocated rather than green belt.	The policy is considered to be unsound as it is not in accordance with the NPPF as it does not demonstrate exceptional circumstances to amend the Green Belt boundary. All alternative options have been considered. An alternative site south of Houghton le Spring should be allocated rather than green belt.	Policy SP1 should be amended to state that the green belt boundary to accommodate housing will only be amended where it can be demonstrated that there are no alternative non green belt sites available which can meet the housing need.	The Council has prepared a 2018 Green Belt Exceptional Circumstances Paper that explains the justification for development of HGA sites in the Green Belt. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD149	Chapter	4	Support						Northumbria Water support the overall principal for continued sustainable development. While they are aware that the latest Viability Assessment has identified some of the brownfield sites as unviable and that they cannot be relied upon in the housing supply, they support and encourage references throughout the spatial strategy to the reuse of brownfield land across the city as it can improve existing flood risk by reducing surface water discharge. In regards to sites HGA2 and HGA5 sewers have been identified which will require to be designed to ensure access.	No proposed modifications	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham	PD138	Policy	SP1	Support				Note that the OAN is			No modifications	The Council notes this response.	The Council considers

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		County Council	7							based on an economic uplift over and above the Government's standard methodology. This is considered a matter for Sunderland City Council to justify to the Local Plan Inspector and not a matter which Durham County Council wish to provide comment on.			proposed.		there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Angela	Templeman	Springwell Village Residents Association	PD5022	Chapter	4	Object		Object to Paragraph 4.26. Too much development on Greenfield and Green Belt land, which is contrary to the NPPF which prioritises development on brownfield land. No evidence the Council has prioritised brownfield land - brownfield register not updated since December 2017. Object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. No reason to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and no house price pressures. Object to Paragraph 4.14, as no evidence that there is need for the proposed number of houses to support economic growth.	Object to Paragraph 4.26. Too much development on Greenfield and Green Belt land, which is contrary to the NPPF which prioritises development on brownfield land. No evidence the Council has prioritised brownfield land - brownfield register not updated since December 2017. Object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. No reason to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and no house price pressures. Object to Paragraph 4.14, as no evidence that there is need for the proposed number of houses to support economic growth.	Object to Paragraph 4.26. Too much development on Greenfield and Green Belt land, which is contrary to the NPPF which prioritises development on brownfield land. No evidence the Council has prioritised brownfield land - brownfield register not updated since December 2017. Object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. No reason to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and no house price pressures. Object to Paragraph 4.14, as no evidence that there is need for the proposed number of houses to support economic growth.	Object to Paragraph 4.26. Too much development on Greenfield and Green Belt land, which is contrary to the NPPF which prioritises development on brownfield land. No evidence the Council has prioritised brownfield land - brownfield register not updated since December 2017. Object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. No reason to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and no house price pressures. Object to Paragraph 4.14, as no evidence that there is need for the proposed number of houses to support economic growth.	Object to Paragraph 4.26. Too much development on Greenfield and Green Belt land, which is contrary to the NPPF which prioritises development on brownfield land. No evidence the Council has prioritised brownfield land - brownfield register not updated since December 2017. Object to Paragraph 4.13 as there is no evidence to support the number of houses proposed for IAMP workers. No reason to deviate from standardised approach for housing requirement if 9,600 jobs were previously created and no house price pressures. Object to Paragraph 4.14, as no evidence that there is need for the proposed number of houses to support economic growth.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	Policy SP1 prioritises development of previously developed land. The SHLAA has identified all available previously developed land. The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the compliance statement for Policy SP1. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carol	Dougherty		PD203	Policy	SP1	Object						Object to Policy SP1 as it directly conflicts with the proposed Renewable Energy Centre and Climate Change Action Plan which the council has set out how they are seeking to reduce CO2 emissions etc.	Energy from waste plants should only be considered as far away from schools and residential properties as possible, or not at all.	The Council considers this policy to be sound. The plan does not allocate an energy from waste site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Angela	Templeman	Springwell Village Residents Association	PD4919	Policy	SP1	Object		Object on the grounds that Policy SP1 has not been positively prepared because the evidence base has not been objectively assessed. The Council is proposing a higher level of growth than the Standardised approach without any reason or supporting evidence. A range of data suggests the Council	Object on the grounds that Policy SP1 is not effective in protecting Sunderland's character and environmental assets and mitigating the likely effects of climate change. It would remove all of these things around Springwell and ignores the environmental impact of		Object on the grounds that Policy SP1 has not been positively prepared because the evidence base has not been objectively assessed. The Council is proposing a higher level of growth than the Standardised approach without any reason or supporting evidence. A range of data suggests the	Object on the grounds that Policy SP1 is not justified because it is not balanced, credible or robust as there is no evidence to justify a 76.22% uplift to the standardised approach. The number of workers to justify the house is unrealistic. House prices are static, so no market pressure of unmet need. The	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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							should not deviate from the standard methodology, therefore it is not consistent with national policy.	commuting.		Council should not deviate from the standard methodology, therefore it is not consistent with national policy.	policy ignores the existing unemployed workforce. Particularly object to Point 1v as it will undermine the existing community in Springwell and proposals cannot be supported by adequate infrastructure.			
Caroline	Strugnell	Bellway Homes Ltd	PD1857	Policy	SP1	Object		Object to the housing requirement in Policy SP1 which is not sufficient to meet the economic potential or ambition of the area. Support the use of the 2014 based household projections which are the latest published version. Consider that a return to higher headship rates should be used. Concerned that full impact of jobs growth is not applied as a workplace based jobs figure is used and then a commuting ratio applied, which double counts this factor. Agree with use of Experian SENS A assumptions. Consider jobs growth figure is not aspirational enough. Housing requirement should be at least 812dpa. The housing requirement would not help the Council deliver its affordable housing need which justifies an uplift.		Object to the housing requirement in Policy SP1 which is not sufficient to meet the economic potential or ambition of the area. Support the use of the 2014 based household projections which are the latest published version. Consider that a return to higher headship rates should be used. Concerned that full impact of jobs growth is not applied as a workplace based jobs figure is used and then a commuting ratio applied, which double counts this factor. Agree with use of Experian SENS A assumptions. Consider jobs growth figure is not aspirational enough. Housing requirement should be at least 812dpa. The housing requirement would not help the Council deliver its affordable housing need which justifies an uplift.	Object to the housing requirement in Policy SP1 which is not sufficient to meet the economic potential or ambition of the area. Support the use of the 2014 based household projections which are the latest published version. Consider that a return to higher headship rates should be used. Concerned that full impact of jobs growth is not applied as a workplace based jobs figure is used and then a commuting ratio applied, which double counts this factor. Agree with use of Experian SENS A assumptions. Consider jobs growth figure is not aspirational enough. Housing requirement should be at least 812dpa. The housing requirement would not help the Council deliver its affordable housing need which justifies an uplift.	Increase housing requirement to at least 812 dwellings per annum.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement. Policy H2 of the Plan seeks to deliver at least 15% affordable housing on sites of 10 dwellings or more or where the site area would be 0.5ha or more.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Denny	Wilson		PD5490	Policy	SP1	Object					Object to policy SP1 on the grounds that there are no exceptional circumstances which justify the release of Green Belt land at North Hylton. Brownfield site should be prioritised rather than development of arable/agricultural land.	No proposed modifications.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement (see Policy SS4 regarding site HGA7 at North Hylton).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD1027	Policy	SP1	Object					Considers policy SP1.2 v not to be justified due to the plan making provision for an unrealistically high number of homes. Suggest a figure of 10,225 which would result in no requirement to release land from the green belt. HGA's can be abandoned.	Amend policy SP1.2 v to delete reference to HGA's, delete HGA's from proposals map and re-instate the existing green belt boundaries.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WD & CT	Dunn		PD262	Policy	SP1	Object		Object to the housing requirement which is based on overambitious jobs number. There is uncertainty over IAMP due to Brexit. Experian assumptions are not convincing and				No modifications proposed.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								proposals for mainly executive housing is not consistent with the NPPF. Development should be focused in the city centre and on brownfield land. Housing should be provided for first time buyers and the elderly. House prices are static to no evidence of demand.						accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3014	Policy	SP1	Object		Object to the uplift to the OAN to support economic growth. Concern that job numbers are based on one data source and Government data is not used. Over-reliance on the IAMP, which may not deliver as anticipated. Plan should be reviewed in 3-5 years and if IAMP is a success, an uplift to the housing requirement made then. House market data does not suggest an undersupply.				Object to the uplift to the OAN to support economic growth. Concern that job numbers are based on one data source and Government data is not used. Over-reliance on the IAMP, which may not deliver as anticipated. Plan should be reviewed in 3-5 years and if IAMP is a success, an uplift to the housing requirement made then. House market data does not suggest an undersupply.	Do not uplift OAN to support economic growth. Review Plan in 3-5 years and then decide to uplift depending on success of the IAMP.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The employment growth forecast is considered to be realistic and achievable. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stephanie	Pickering		PD6	Policy	SP1	Object						Objection based on there being no justification for removing seven pitches and replacing with two elsewhere, particularly when the fields are well used on a weekly basis. Suggests making available brownfield sites for housing and identifies that part of the site is privately owned.	Suggests that HGA6 was gifted to the people of Washington by Lord Lambton for sports use and do not have a right to develop the site. The council have no right whatsoever to build on this land and they cannot prove they actually own this land if the deeds are missing.	Comment noted. The Council has proposed a modification to this policy to make clear that development can only take place if the playing pitches are deemed surplus to requirement through an updated Playing Pitch Assessment, or if alternative provision is provided (M22).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
Philip	Aunger		PD200	Chapter	4	Object	Objects to the chapter on the grounds that it is not legally compliant.	Objects on the grounds that the area is struggling to cope with the volume of people already living there. Concerns over local school capacity and congestion on the roads.	Objects to the chapter on the grounds that it is not effective.				The representor would like the chapter relating to Penshaw's Green Belt to be removed from the Plan.	The Council considers this chapter to be sound. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of the housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018).</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in the Compliance Statement and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Linda	Barron		PD708	Policy	SP1	Object						Objects development on Green Belt land.	No modifications proposed.	<p>The Council considers the Plan to be sound. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of the housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018).</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lynn	Hutcheon		PD796	Policy	SP1	Object						Objects to Policy SP1- disagrees that the scale of housing development is justified, and that greenspace and Green Belt should be protected from development.	No modifications proposed.	<p>The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Natalie	Moralee		PD820	Policy	SP1	Object				Objects to Policy SP1 for the following reasons: the Council		Objects to Policy SP1 for the following reasons: the Council	Not to amend the boundary of the Green Belt.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt</p>	The Council considers there have been no soundness or legal

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications	
										has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/ based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.		has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/ based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.		boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
		NHS Sunderland CCG	PD66	Policy	SP1	Object		Objects to policy SP1 on the grounds of there being a missing requirement to ensure development mitigated its impacts, and suggests an additional criterion to make it sound.	Objects to policy SP1 on the grounds of there being a missing requirement to ensure development mitigated its impacts, and suggests an additional criterion to make it sound.			Objects to policy SP1 on the grounds of there being a missing requirement to ensure development mitigated its impacts, and suggests an additional criterion to make it sound.	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.	The Council considers this policy to be sound. The Council and NHS Sunderland CCG have signed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Chris	Butler		PD897	Policy	SP1	Object						Objects to Policy SP1 on the grounds that there is little evidence of levels of economic and housing growth planned for are required. Green Belt development will make result in decline of quality of Sunderland as a place to live. Low house prices and slow house moves suggest true demand and supply picture. Flooding the market with more suburban housing will make this worse. Questions the need for additional retail floorspace in Sunderland due to closed retail units, online shopping and rival retail centres. Focus should be on conversion to other uses and supporting retailers through business rate reductions, affordable parking and rents.	Focus for retail areas should be on revitalisation through conversion to other uses and supporting existing retailers.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
John	Cooper		PD281	Policy	SP1	Object		Objects to Policy SP1 on the grounds that the housing requirement is too high and not based on robust evidence. The requirement is based on the older 2014 based population projections, rather than the 2016 based projections which are lower. There is no justification to deviate from the standardised approach. Planning permissions already	Objects to Policy SP1 on the grounds that the housing requirement is too high and not based on robust evidence. The requirement is based on the older 2014 based population projections, rather than the 2016 based projections which are lower. There is no justification to deviate from the standardised approach. Planning permissions already			Objects to Policy SP1 on the grounds that the housing requirement is too high and not based on robust evidence. The requirement is based on the older 2014 based population projections, rather than the 2012 based projections which are lower. There is no justification to deviate from the standardised approach. Planning permissions already	Objects to Policy SP1 on the grounds that the housing requirement is too high and not based on robust evidence. The requirement is based on the older 2014 based population projections, rather than the 2016 based projections which are lower. There is no justification to deviate from the standardised approach. Planning permissions already	No proposed modifications.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								provide enough sites to meet ONS housing estimates. Inadequate consideration has been given to bringing empty homes into use. The housing densities used have been too low. Housing requirement is much higher than ONS estimates or standard methodology. There is no justification for an economic uplift as GVA/Hr is the highest in the North East. House prices are flat lining. There are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth. There is double counting of housing numbers across local authorities. There is not justification to delete Green Belt Land.	provide enough sites to meet ONS housing estimates. Inadequate consideration has been given to bringing empty homes into use. The housing densities used have been too low. Housing requirement is much higher than ONS estimates or standard methodology. There is no justification for an economic uplift as GVA/Hr is the highest in the North East. House prices are flat lining. There are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth. There is double counting of housing numbers across local authorities. There is not justification to delete Green Belt Land.		provide enough sites to meet ONS housing estimates. Inadequate consideration has been given to bringing empty homes into use. The housing densities used have been too low. Housing requirement is much higher than ONS estimates or standard methodology. There is no justification for an economic uplift as GVA/Hr is the highest in the North East. House prices are flat lining. There are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth. There is double counting of housing numbers across local authorities. There is not justification to delete Green Belt Land.	provide enough sites to meet ONS housing estimates. Inadequate consideration has been given to bringing empty homes into use. The housing densities used have been too low. Housing requirement is much higher than ONS estimates or standard methodology. There is no justification for an economic uplift as GVA/Hr is the highest in the North East. House prices are flat lining. There are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth. There is double counting of housing numbers across local authorities. There is not justification to delete Green Belt Land.		other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach in the SHLAA where all available previously developed sites are identified and addresses the Council's approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. Further justification is set out within the Compliance Statement.	
John	Blundell		PD86	Policy	SP1	Object		Objects to the housing requirement in Policy SP1. There is no justification to deviate from the standardised methodology. The Council has not used the latest population projections. Uplift to housing requirement is predicated on one employment site - IAMP, whose workers will be spread across a wide area. There is overprovision of housing across North East authorities. No evidence of economic intervention required, due to higher GVA in the north east. Unemployed workers can fill new jobs. Consented housing schemes pre-empted the Core Strategy. Enough land in brownfield register to deliver necessary housing. Inefficient use of brownfield	Objects to the housing requirement in Policy SP1. There is no justification to deviate from the standardised methodology. The Council has not used the latest population projections. Uplift to housing requirement is predicated on one employment site - IAMP, whose workers will be spread across a wide area. There is overprovision of housing across North East authorities. No evidence of economic intervention required, due to higher GVA in the north east. Unemployed workers can fill new jobs. Consented housing schemes pre-empted the Core Strategy. Enough land in brownfield register to deliver necessary housing. Inefficient use of brownfield	Objects to the housing requirement in Policy SP1. There is no justification to deviate from the standardised methodology. The Council has not used the latest population projections. Uplift to housing requirement is predicated on one employment site - IAMP, whose workers will be spread across a wide area. There is overprovision of housing across North East authorities. No evidence of economic intervention required, due to higher GVA in the north east. Unemployed workers can fill new jobs. Consented housing schemes pre-empted the Core Strategy. Enough land in brownfield register to deliver necessary housing. Inefficient use of brownfield	Objects to the housing requirement in Policy SP1. There is no justification to deviate from the standardised methodology. The Council has not used the latest population projections. Uplift to housing requirement is predicated on one employment site - IAMP, whose workers will be spread across a wide area. There is overprovision of housing across North East authorities. No evidence of economic intervention required, due to higher GVA in the north east. Unemployed workers can fill new jobs. Consented housing schemes pre-empted the Core Strategy. Enough land in brownfield register to deliver necessary housing. Inefficient use of brownfield	Objects to the housing requirement in Policy SP1. There is no justification to deviate from the standardised methodology. The Council has not used the latest population projections. Uplift to housing requirement is predicated on one employment site - IAMP, whose workers will be spread across a wide area. There is overprovision of housing across North East authorities. No evidence of economic intervention required, due to higher GVA in the north east. Unemployed workers can fill new jobs. Consented housing schemes pre-empted the Core Strategy. Enough land in brownfield register to deliver necessary housing. Inefficient use of brownfield	Reduce housing requirement to standardised requirement at most. Increase densities on brownfield sites.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								land. Exceptional circumstances have not been demonstrated to release Green Belt land.	circumstances have not been demonstrated to release Green Belt land.	land. Exceptional circumstances have not been demonstrated to release Green Belt land.	circumstances have not been demonstrated to release Green Belt land.	circumstances have not been demonstrated to release Green Belt land.			
Ann	Huntley		PD378	Policy	SP1	Object						Objects to the housing requirement set out within Policy SP1 on the grounds that has been calculated using the 2014 Sub National Population Projections and not the more recent 2016 Sub National Projections, which predict a lower level of population growth. Consider that the international migration component of the 2016 based projections is revised down to take account of 2017 international migration figures.	The housing requirement should be reduced and no development proposed on Green Belt land. The proportion of development on greenfield land should also be reconsidered and reduced down significantly.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Victor	Cadaxa		PD264	Policy	SP1	Object						Objects to Policy SP1 on the grounds that the housing requirement is not based on the latest population projections. The SHMA uses the 2014 based population projections, which were significantly higher than the latest 2016 population projections.	The Plan should be updated to reflect the lower 2016 based population projections. In light of the lower projections, there is no need to release land from the Green Belt for development. In addition, the amount of Greenfield land identified for development should be reconsidered and downgraded.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Robin	Glass		PD898	Policy	SP1	Object					The Plan is not consistent with the NPPF which indicates the Council must provide for infrastructure needs alongside new development. The Plan does not do this.	Objects to the Plan on the grounds that the Plan has not taken into account the real improved infrastructure that will be required, previous comments have not been taken into consideration, no rationale for policies to be considered strategic, it does little to deliver affordable housing, Green Belt should only be developed as a last resort, not all alternative sites have been fully explored, there is a lack of transparency for the sites chosen, the Plan is strong on intent and weak on deliverability, the plan is based on out of date evidence and the exceptional circumstances paper was not commissioned until January 2018 after the decision had already been taken to develop in the Green Belt.	Alternative sites should be considered before Green Belt.	The Council identified a need for development in the Green Belt in the Draft Plan. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Plan also contains a Policy (H2) which addresses the Council's approach to affordable homes. Further justification is set out in the Compliance Statement. The Council considers this Policy to be sound.	
Paul	Skinner		PD8497	Chapter	4	Object			Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.		Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.	Development should be focussed on brownfield sites and be for bungalows and affordable housing, not multi-storey units and executive housing. Basic facilities should be maintained at Seaburn and public transport links improved. Vaux site should be used to provide a walking and cycling link from the city centre to the harbour, not offices. The affordable housing requirement should be raised to 50% instead of 15%.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement. Further comments relating to Seaburn are deemed non-strategic and can be further examined in the Allocations & Designations DPD.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Claire	Armstrong		PD265	Policy	SP1	Object						Objects to the Plan on the grounds that the development within the Green Belt is not justified. There are a lot of existing houses which are not selling and no requirement for further houses. If houses are required brownfield sites should be used. The Plan does not take account of petition which opposed housing in the Green Belt. The proposals have not been properly advertised.	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The speed of housing development differs from site to site, but the Council's evidence demonstrates on ongoing need and demand for new housing, including within the Coalfield area. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Pippa	Cheetham	O&H Properties	PD4207	Policy	SP1	Support						Policy is supported- housing numbers and types are justified and sound, and backed by appropriate infrastructure.	No proposed modifications.	Comments noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mary	Peel		PD8430	Policy	SP1	Object				Queries the evidence base to support building 13,000 homes when Government data supports 7,610 and there are 50,000 empty homes in the north.	Queries the evidence base to support building 13,000 homes when Government data supports 7,610 and there are 50,000 empty homes in the north.	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The speed of housing development differs from site to site, but the Council's	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														evidence demonstrates on ongoing need and demand for new housing, including within the Coalfield area. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).		
Neil	Cole	South Tyneside Council	PD4363	Policy	SS1	Support				South Tyneside acknowledge the Plan overarching growth proposals for new homes, jobs, and shops and would support the Plan in these matters.			No modification proposed	The Council will continue to work with South Tyneside as part of the Duty to Cooperate.	The Council will continue to work with South Tyneside as part of the Duty to Cooperate.	
Mike	Van Geffen	Getten Construction Ltd	PD2616	Policy	SP1	Object		SP1 is unsound because the minimum housing requirement is too low, and needs to be increased to address the imbalance in household formation rates and provide additional affordable homes. Also consider that shortfall of 177 homes does not equate to a release of 1200 homes in Green Belt. Consultee's site at Albany Park has also been overlooked and should be included in housing numbers before any Green Belt is released.	SP1 is unsound because the minimum housing requirement is too low, and needs to be increased to address the imbalance in household formation rates and provide additional affordable homes. Also consider that shortfall of 177 homes does not equate to a release of 1200 homes in Green Belt. Consultee's site at Albany Park has also been overlooked and should be included in housing numbers before any Green Belt is released.			SP1 is unsound because the minimum housing requirement is too low, and needs to be increased to address the imbalance in household formation rates and provide additional affordable homes. Also consider that shortfall of 177 homes does not equate to a release of 1200 homes in Green Belt. Consultee's site at Albany Park has also been overlooked and should be included in housing numbers before any Green Belt is released.	SP1 is unsound because the minimum housing requirement is too low, and needs to be increased to address the imbalance in household formation rates and provide additional affordable homes. Also consider that shortfall of 177 homes does not equate to a release of 1200 homes in Green Belt. Consultee's site at Albany Park has also been overlooked and should be included in housing numbers before any Green Belt is released.	No modifications proposed.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Housing Growth Areas include a flexibility factor to ensure that the housing requirement can be delivered. The site at Albany Park is already included as a deliverable housing site in the SHLAA. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	French		PD306	Policy	SP1	Object						Considers policy SP1 is not justified due to the significant downward population projection by ONS for the North East. As such there is no need for 1,500 houses to be built on present green belt land.	Policy for building on green belt land and the site selection plan should be withdrawn. The proposed 40% new development on greenfield sites should be reconsidered and abandoned altogether.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
		Urban and Civic	PD855	Policy	SP1	Object		Strategic Policies SP1 and SP9 (together with paragraph 4.18) only deal with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for either convenience or comparison retailing.				Strategic Policies SP1 and SP9 (together with paragraph 4.18) only deal with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for either convenience or comparison retailing. This issue should in particular be addressed with re-wording of policy SP9.	No modification proposed.	Comment noted. Site Allocations will be made through the Allocations and Designations Plan, which will address any qualitative needs.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
	Unknown	Harworth Estates	PD2005	Policy	SP1	Support						Support proposed economic growth proposed in Plan including IAMP and allocation for 95 hectares of employment land. This will help to justify development of Harworth Estates land at Wardley in South Tyneside.	No modifications proposed.	The Council note this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Adam	McVickers	Persimmon Homes (Durham)	PD3905	Policy	SP1	Support with mods						Support that Policy SP1 seeks to achieve the housing requirement as a minimum and commend the Council for setting a	Consider increasing the housing requirement to support an uplift in HRRs for young adults and to support affordable housing.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to	

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												housing requirement above the standardised methodology, which is required to support economic growth. However, feel that the housing requirement should be increased to support an uplift in HRRs for 25 to 44 year olds and to help the Council address the affordable housing imbalance.			the Plan. Therefore no modifications are proposed.
WYNYARD HOMES		Wynyard Homes	PD4694	Chapter	4	Object		Support the housing requirement and the acknowledgement that this should be treated as a minimum. Support the uplift to the OAN above the standardised methodology to support economic growth, including the IAMP. Propose that additional sites are identified to ensure there is choice and completion in the housing market. Support Criteria 2i. Question the amount of development which can be delivered in the urban area. Disagree that Green Belt boundaries need to be amended as there are non Green Belt sites available, such as site at Quarry House Lane. This is not protected by a national designation.			Support the housing requirement and the acknowledgement that this should be treated as a minimum. Support the uplift to the OAN above the standardised methodology to support economic growth, including the IAMP. Propose that additional sites are identified to ensure there is choice and completion in the housing market. Support Criteria 2i. Question the amount of development which can be delivered in the urban area. Disagree that Green Belt boundaries need to be amended as there are non Green Belt sites available, such as site at Quarry House Lane. This is not protected by a national designation.	Support the housing requirement and the acknowledgement that this should be treated as a minimum. Support the uplift to the OAN above the standardised methodology to support economic growth, including the IAMP. Propose that additional sites are identified to ensure there is choice and completion in the housing market. Support Criteria 2i. Question the amount of development which can be delivered in the urban area. Disagree that Green Belt boundaries need to be amended as there are non Green Belt sites available, such as site at Quarry House Lane. This is not protected by a national designation.	Allocate site at Quarry House Lane for residential development.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Council does not support the site put forward by Wynyard Homes due to the fundamental impact on Settlement Break. As explained in the 2018 Settlement Break Review (Chapter 13, pages 139-149) this site (represented by field parcels 8 and 10) provides strong Settlement Break purpose, helping to retain East Rainton's distinct character and keep separate from Hetton-le-Hole. This is broadly supported by the 2012 NPPF (paragraph 58), which states that planning policies and decisions should aim to ensure that developments respond to local character and history. The Revised NPPF (2018) paragraphs 122 and 127 is more clear on this, stating that development should be sympathetic to local character and setting and maintain an area's prevailing character and setting. Although East Rainton has witnessed expansion over recent decades (and very recently with the Avant Homes site to the north of the village), the village is mediaeval in origin, dating back to at least the 12th Century, and the scale of the development proposed would impact significantly on its character, expanding the urban envelope by more than 30%. In addition to this, the field parcels also plays a key role in terms of green infrastructure connectivity, supporting a district-wide corridor that links Hetton Bogs and the Moors Burn southwards into County Durham. Priority species are also found within or in close proximity to the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3382	Policy	SP1	Support						Support the housing requirement in Policy SP1. Recognise that this exceeds the Government's indicative assessment using the standardised methodology, but this is a baseline figure which should be a minimum. Support the housing growth areas.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dominic	Smith	Esh Developments Ltd	PD1827	Policy	SP1	Support						Support the Policy and put forward that there is a need to deliver a higher level of housing than the 745 OAN figure, acknowledging that the growth figure should not be seen as a ceiling level of growth. States that the Government's standardised methodology represents a level of growth which would have serious consequences for the city's economy. Strongly supports Green Belt site release.	No modifications proposed.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey		Taylor	PD347	Policy	SP1	Support						Support the Policy	No modifications	The housing requirement set out	The Council considers

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		Wimpey	0									and put forward that there is a need to deliver a higher level of housing than the 745 OAN figure, acknowledging that the growth figure should not be seen as a ceiling level of growth. States that the Government's standardised methodology represents a level of growth which would have serious consequences for the city's economy. Strongly supports Green Belt site release.	proposed.	within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD4712	Policy	SP1	Support with mods						Support the Policy and put forward that there is a need to deliver a higher level of housing than the 745 OAN figure, acknowledging that the growth figure should not be seen as a ceiling level of growth. States that the Government's standardised methodology represents a level of growth which would have serious consequences for the city's economy. Strongly supports Green Belt site release.	No modifications proposed.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5556	Policy	SP1	Support						Support the Policy and put forward that there is a need to deliver a higher level of housing than the 745 OAN figure, acknowledging that the growth figure should not be seen as a ceiling level of growth. States that the Government's standardised methodology represents a level of growth which would have serious consequences for the city's economy. Strongly supports Green Belt site release.	No modifications proposed.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Jameson	Miller Homes Ltd - NE Region	PD889	Policy	SP1	Support with mods		Support that the housing requirement set out in Policy SP1 is considered to be a minimum. Disappointed that the requirement has been reduced from the previous draft and would prefer the previous requirement of 13,824 to be reinstated. If not revised, strongly reiterate the commitment to the housing requirement being a minimum. Wish for SHLAA site 154A to be included as a housing allocation in the A&D Plan.				Support that the housing requirement set out in Policy SP1 is considered to be a minimum. Disappointed that the requirement has been reduced from the previous draft and would prefer the previous requirement of 13,824 to be reinstated. If not revised, strongly reiterate the commitment to the housing requirement being a minimum. Wish for SHLAA site 154A to be included as a housing allocation in the A&D Plan.	Reinstatement of previous housing requirement or ensure that Policy makes clear the requirement is a minimum.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Central Gospel Hall Trust	PD145	Policy	SP1	Support						Supports Policy SP1 and the overall strategy in terms of the level and distribution of growth, which is consistent with national policy and seeks to address the historic mismatch between economic growth and housing.	No Modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												The spatial strategy for Washington is supported. The amendments to the Policies Map are supported.			
		Hellens	PD4664	Policy	SP1	Support with mods			Any further Future development within the Settlement Breaks and the Open Countryside in the southern part of the city will could have major impacts on both infrastructure and the environment and this approach is becoming more and more unsustainable.			Supports the Policy and welcomes recognition in paragraph 2.24 and SP1(2)(i) that the Coalfield will remain a focus for new housing and housing regeneration over plan period. However, concern that paragraph 4.24 states that development in southern part of the city is becoming more and more unsustainable, and suggest that some sites could still come forward without any major adverse impacts.	Hellens suggests the following simplification to para. 4.24 to ensure compliance with the National Planning Policy Framework and a sound CSDP: Any further future development within the Settlement Breaks and the Open Countryside in the southern part of the city "could have an impact" on both infrastructure and the environment.	The Council propose an additional modification to paragraph 4.24 to reflect this representation (M16).	Any further Future development within the Settlement Breaks and the Open Countryside in the southern part of the city will could have major impacts on both infrastructure and the environment and this approach is becoming more and more unsustainable.
Laura	Roberts	Northumbrian Water	PD2681	Policy	SP1	Support with mods			The consultee welcomes confirmation in SP1 and Paragraph 4.10 that the housing requirement is a target which is both needed and anticipated rather than a ceiling. The consultee has put forward the former Fulwell Reservoir site for housing and propose it for inclusion in the CSDP.			Allocate the former Fulwell reservoir site for housing in the CSDP.	As this plan relates to strategic allocations, site specific allocations are not included on the proposals map, this will be undertaken as part of the Allocations and Designations plan. As such, the site allocation at Fulwell reservoir site has not been removed and is not considered to be 'white land'. With regards the inclusion of the site in the housing supply, vehicular access to the site cannot accommodate two-way traffic and as such any residential development would be limited to a private courtyard of no more than 3 units.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Katie	Sully	Siglion	PD2912	Policy	SP1	Object						The Farrington Row brownfield site is included in the SHLAA for 69 units but is not allocated as a housing site, and also has capacity for 156 units. Numbers Garth site is considered unsuitable in the SHLAA, but evidence has been submitted to prove this site can be delivered and can provide 45 units.	The Farrington Row site should be allocated for housing for 156 units, and the Numbers Garth site should be allocated for 45 units.	The SHLAA was updated in March 2018 following engagement with landowners and developers. The Council will review the SHLAA on an annual basis.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	Ms. Taylor & Ms. McClelland		PD4355	Policy	SP1	Object						The Green Belt assessment and subsequently the proposed allocation of housing sites is flawed as there are reasonable alternative sites not within the Green Belt which could be developed to contribute towards meeting housing need, therefore exceptional circumstances for de-allocation do not exist. The consultee's site at Hutton Close is one such alternative site.	No modifications proposed.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). The Council does not support the Hutton Close site (SHLAA site 340) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. In chapter 11 of the Settlement Break Review this site (represented by field parcel 2) provides strong Settlement Break purpose, contributing to the separation of Houghton and Fence Houses/Colliery Row, and in particular contributing the green infrastructure corridor along the Moors Burn. The SHLAA provides more specific detail (see site 340 - SHLAA Appendix P Coalfield Site Assessments Report, pages 97-99), highlighting that the site is directly affected by the Moors Burn functional floodplain (Flood Zone 3 as well as Flood Zone 2). The land also lies within a Critical Drainage Area, and it is noted that immediately to the north the Moors Burn is flanked on its eastern edge by a man-made bund that helps to reduce flooding into the adjacent residential area. Therefore, major engineering solutions have already been undertaken in this locality, and this adds further uncertainty in terms of site suitability and achievability. The proximity of the site to the Moors Burn itself would also significantly	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														impact on its setting as well as priority species that are known to exist within the corridor.	
Joanne	Harding	Home Builders Federation	PD1182	Policy	SP1	Object		The HBF supports LPAs decision to use an OAN figure above the standard methodology to help support population aspirations, increase the working age population, support sustainable development, to boost housing supply and to support economic growth. The HBF is concerned that no adjustment has been in respect to household representative rate (HRRs). The implication of this is that the latest projections continue to be affected by suppressed trends in HRRs leading to unaffordability which affect younger households. The HBF consider it to be prudent to consider an uplift in HRRs amongst this group to reverse negative trend. To meet the affordable housing imbalance it is suggested that the housing figure is increased to address the affordable housing needs of the city.	The HBF supports LPAs decision to use an OAN figure above the standard methodology to help support population aspirations, increase the working age population, support sustainable development, to boost housing supply and to support economic growth. The HBF is concerned that no adjustment has been in respect to household representative rate (HRRs). The implication of this is that the latest projections continue to be affected by suppressed trends in HRRs leading to unaffordability which affect younger households. The HBF consider it to be prudent to consider an uplift in HRRs amongst this group to reverse negative trend. To meet the affordable housing imbalance it is suggested that the housing figure is increased to address the affordable housing needs of the city.		The HBF supports LPAs decision to use an OAN figure above the standard methodology to help support population aspirations, increase the working age population, support sustainable development, to boost housing supply and to support economic growth. The HBF is concerned that no adjustment has been in respect to household representative rate (HRRs). The implication of this is that the latest projections continue to be affected by suppressed trends in HRRs leading to unaffordability which affect younger households. The HBF consider it to be prudent to consider an uplift in HRRs amongst this group to reverse negative trend. To meet the affordable housing imbalance it is suggested that the housing figure is increased to address the affordable housing needs of the city.	The HBF supports LPAs decision to use an OAN figure above the standard methodology to help support population aspirations, increase the working age population, support sustainable development, to boost housing supply and to support economic growth. The HBF is concerned that no adjustment has been in respect to household representative rate (HRRs). The implication of this is that the latest projections continue to be affected by suppressed trends in HRRs leading to unaffordability which affect younger households. The HBF consider it to be prudent to consider an uplift in HRRs amongst this group to reverse negative trend. To meet the affordable housing imbalance it is suggested that the housing figure is increased to address the affordable housing needs of the city.	The housing requirement should be increased.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3242	Policy	SP1	Object						The Plan does not adequately or objectively assess the overall need for housing. The evidence base for the OAN is fundamentally flawed. The calculations for the OAN are flawed. The Council cannot prove the Plan strategy will be delivered. The approach and calculations are not consistent with the NPPF. The OAN is based on out of date population projections. There is no justification for deviation from the Standard Approach. There is a lack of justification for economic growth intervention.	The Plan requires a wholesale review of the evidence base.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3246	Policy	SP1	Object						The Plan does not adequately or objectively assess the overall need for housing. The evidence base for the OAN is fundamentally flawed. The calculations for the OAN are flawed. The Council cannot prove the Plan strategy will be delivered. The approach and calculations are not consistent with the NPPF. The OAN is based on out of date population projections. There is no justification for deviation from the Standard Approach. There is a lack of justification for economic growth	The Plan requires a wholesale review of the evidence base.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed

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												intervention. Removal of Site HGA7 from the Green Belt has not been adequately justified			
Steven	Liddle		PD125	Policy	SP1	Object						Objection on the grounds that the plan does not focus on the regeneration of the existing urban area, instead focusing on release of Green Belt land for housing development.	Suggests removing all references relating to development of the Green Belt from the plan as they do not regenerate the city area.	Policy SP1 prioritises delivering the majority of development in the existing urban area. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
M&G Real Estate			PD3601	Policy	SP1	Object		The retail floorspace requirement set out within Policy SP1 is based on out-of-date evidence. The retail environment has changed considerably since the Retail Needs Assessment was prepared, with the growth of Special Forms of Trading more than previously predicted. In addition, the study uses out of date population projections.	The retail floorspace requirement set out within Policy SP1 is based on out-of-date evidence. The retail environment has changed considerably since the Retail Needs Assessment was prepared, with the growth of Special Forms of Trading more than previously predicted. In addition, the study uses out of date population projections.		The retail floorspace requirement set out within Policy SP1 is based on out-of-date evidence. The retail environment has changed considerably since the Retail Needs Assessment was prepared, with the growth of Special Forms of Trading more than previously predicted. In addition, the study uses out of date population projections.	The retail floorspace requirement set out within Policy SP1 is based on out-of-date evidence. The retail environment has changed considerably since the Retail Needs Assessment was prepared, with the growth of Special Forms of Trading more than previously predicted. In addition, the study uses out of date population projections.	The Retail Needs Assessment should be updated and the Plan revised accordingly.	The retail floorspace need is based on the Retail Needs Assessment 2016. This is considered to provide robust and up-to-date evidence. Further justification is provided in the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		The Trustees of Athenaeum Pension Scheme	PD39	Policy	SP1	Support						Support policy SP1 (2)(v) to the extent that it supports delivering the right homes in the right locations through the A & D Plan and through amending the Green Belt boundary to allocate Housing Growth Areas.	No modification proposed	The Council notes this support.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	French		PD307	Policy	SP1	Object						Considers policy SP1 in relation to housing numbers is not justified due to ONS subnational population projections 2016-2026 indicating a reduction in the North East population. As such the CSDP projected housing need is based upon outdated population projections.	No proposed modifications.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Leigh	Mitchell		PD261	Policy	SP1	Object		There are assumptions about growth of the city that don't have firm foundations, resulting of the earmarking of greenbelt or amenity land for housing developments. Brownfield sites are said to be unsuitable but no real explanation is given. Seaburn is an amenity for the whole city and beyond and should not be given over to a housing estate.	There are assumptions about growth of the city that don't have firm foundations, resulting of the earmarking of greenbelt or amenity land for housing developments. Brownfield sites are said to be unsuitable but no real explanation is given. Seaburn is an amenity for the whole city and beyond and should not be given over to a housing estate.		There are assumptions about growth of the city that don't have firm foundations, resulting of the earmarking of greenbelt or amenity land for housing developments. Brownfield sites are said to be unsuitable but no real explanation is given. Seaburn is an amenity for the whole city and beyond and should not be given over to a housing estate.	Review the need for so many homes to be built, and use brownfield sites instead of greenbelt land.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Ryan	Molloy	Thompsons of Prudhoe	PD191	Policy	SP1	Support with mods						Thompsons of Prudhoe consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The Springwell Quarry site is currently in the Green belt as a sandstone quarry with restoration by backfilling waste. There is currently a planning application, as the existing	The Green Belt boundaries should be considered in relation to existing operations in the Green Belt and the Policy SP1 amended accordingly	The Council states that the Green Belt Boundary review identifies minor boundary amendments throughout the report that are non-housing related. Furthermore, the site does not constitute inappropriate development in the Green Belt and currently operates within the Green Belt. Additionally, the Green Belt Assessment Stage 1 Updated and Stage 2 states that removal of the site from Green Belt would have moderate overall adverse impact on Green Belt purpose (pages 68-69) and would also incur a major Green Belt boundary change that would	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												expires in 2022. The location of the site in the Green Belt would potentially limit the future development of the site by limiting the number of structures and development that can occur.		significantly reduce the Green Belt gap between Springwell Village and Eighton Banks (Gateshead). The Green Belt Boundary Assessment concluded that the new boundary proposed by site HGA1 was most appropriate, stating that: the proposed western boundary initially appears to be somewhat arbitrary, running through the centre of the field north to south, with no physical evidence on the ground suggesting an existing permanent boundary in that location. Including land to the west of the proposed western boundary of HGA1 would, however, result in various harmful effects, including the coalescence of Springwell with Eighton Banks and encroachment into a local green corridor.	
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2061	Policy	SP1	Support						Welcome the spatial strategy, which includes the SSGA which is a long standing commitment by Sunderland City Council. Focussing growth in this area represents a sound and sustainable approach.	No modifications proposed.	The Council note this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Martin	Dixon		PD197	Paragraph	4.11	Object						Mr Dixon objects to the paragraph on the grounds that there is no evidence to suggest that building houses provides economic growth; Experian's jobs growth forecasts suggest caution to projections of future growth due to unknowns such as Brexit and the future of Nissan; and Sunderland's population is shrinking with a significant decline in 16-18 year olds. Object to the proposals to build detached houses in the Green Belt.	Change the paragraph to reflect that 7200 jobs may be unrealistic due to unknowns such as Brexit	<p>The Council considers this policy to be sound. The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													justifying the release of the housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.	
Olwyn, Acklam, PD8235 Christine, Alder, PD8344 Jon, Almond, PD8367 Mary, Ashcroft, PD8414 R, Ashcroft, PD8416 Jasen, Balderson, PD8277 Yvonne, Barclay, PD8243 Tony, Barry, PD8271 Pauline, Beckinsale, PD8408 Terish, Bewick, PD8450 Malcolm, Bond, PD8421 Sarah, Bradley, PD8357 Anne, Brown, PD8445 Peter, Burdus, PD8448 Anne, Burdus, PD8449 Jill, Carroll, PD8404 Jason, Carroll, PD8405 Vera, Chisman, PD8229 Janet, Colclough, PD8352 Carol, Cutts, PD8472 David, Cutts, PD8473 Allo, Daley, PD8451 Anthony, Derbyshire, PD8274 John, Devine, PD8230 Alison, Devine, PD8231 Martin, Dixon, PD8478 David, Donaghey, PD8293 Janet, Doran, PD8242 Derek, Dunn, PD8286 Gavin, Elliott, PD8474 David, Fisher, PD8297 Marilyn, Ganley, PD8288 Yvonne, Gray, PD8290 Pauline, Green, PD8477 Graham, Hall, PD8312 Wendy, Hannah, PD8292 Michael, Hartnack, PD8475 James, Henderson, PD8240 Muriel, Heptinstall, PD8234 Shirley, Hetherington, PD8417 Keith, Hetherington, PD8418 Allison, Hicks, PD8295 Frank, Hunter, PD8287 Graham, Hurst, PD8410 Dawn, Hurst, PD8409 Tobias, Hurst, PD8249 Imogen, Hurst, PD8260 Ken, Kilbride, PD8392 D, Martin, PD8246 Michelle, Matlock, PD8193 Charlotte, Matlock, PD8208 Darren, Matlock, PD8218 Tania, McGhie, PD8233 Gill, McIntosh, PD8373 Dorothy, Miller, PD8380 Jackie, Moon, PD8232 P, Nelson, PD8281 Tonya, Owen, PD8278 Andrew, Parkin, PD8443 Jeroen, Pichal, PD8482 Ian, Porter, PD8446 Diane, Porter, PD8447 Helen, Precious, PD8176 Dave, Prosser, PD8399 William, Riley, PD8241 Clair, Roper, PD8476 Geoffrey, Scott, PD8320 Michael, Simmons, PD8379 Carole, Simpson, PD8339 Barbara, Smith, PD8382 Ceili, Smyth-Bates, PD8178 Jennifer, Staward, PD8381 Joe, Stewart, PD8419 Pam, Stewart, PD8420 Valerie, Swaine, PD8471 Margaret, Taylor, PD8396 Paul, Thompson, PD8479 Brenda, Thornton, PD8444 John, Towner, PD8239 Tom, Turner, PD8171 Margaret, Walton, PD8244 Alan, Walton, PD8245			Paragraph	4.11	Object					Disagree with the Council not following the Governments standardised methodology to calculate the housing requirement. There is no evidence for the higher housing need. Disagree that economic growth would be constrained due to labour supply. Do not consider that in-commuting is a bad thing.	The Plan should be withdrawn. The housing and spatial strategy are flawed and cannot be remedied.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework and therefore it is not considered appropriate to follow the standardised methodology. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Carol Ward, PD8284 Eileen Wight, PD8411 Richard Wight, PD8412 Melanie Wight, PD8403 Michael Wooler, PD8402 Andy Wraith, PD8190															
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3015	Paragraph	4.20-4.30	Object					Does not consider that supplies of previously developed land have been exhausted or fully considered. Limited detail on extent of contamination and remediation costs for sites.	No modifications proposed.	The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Martin	Dixon		PD198	Paragraph	4.14	Object					Mr Dixon objects on the grounds that the Government calculates a Local Housing Need of 593 dwellings per annum for Sunderland, lower than that proposed in the Plan. In addition, Mr Dixon objects to the in-commuting rates being described as unsustainable.	Reflect Government calculation of Local Housing Need (593 dwellings) in the paragraph and removed bullet pointed justifications that are unsound.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
		Hellens Group	PD237	Paragraph	4.15	Support					Hellens agrees with the position of the LPA to not use the standard housing calculation for Sunderland. This is in accordance with the new NPPF paragraph 209 as the Plan will be submitted during transition. It is noted that the full revised PPG has not been published to date, however in accordance with the draft PPG there is justifications for an increase in housing to meet economic objective even the provision of the revised NPPF are utilised.	No proposed modification	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Martin	Dixon		PD202	Paragraph	4.21	Object					Objection on the grounds that the usage of brownfield sites must be maximised before other sites are considered and that there is no clear evidence regarding the viability of brownfield sites in Sunderland.	Include clear referenced reports on brownfield sites and their viability in Sunderland within the Plan.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The 2017 Viability Assessment has considered a number of different site typologies to determine whether sites are deliverable within the Plan period. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Elizabeth	Martin		PD415	Paragraph	4.20 and 4.21	Object				Objects to Plan on the grounds that brownfield sites have not been fully assessed. There has been no survey/assessment as to the cost of making unviable land viable and how the Council can work with developers to share this cost so there is no need to alter Green Belt boundaries.	Objects to Plan on the grounds that brownfield sites have not been fully assessed. The Plan is contrary Paragraph 146 of the NPPF which requires the Plan to make as much use as possible of suitable brownfield land.	Objects to Plan on the grounds that brownfield sites have not been fully assessed. There has been no survey/assessment as to the cost of making unviable land viable and how the Council can work with developers to share this cost so there is no need to alter Green Belt boundaries.	A detailed assessment should be undertaken as evidence of brownfield sites deemed unviable or undeliverable on the cost/effort needed to make them viable. Discussions should take place with developers regarding how these sites can be brought forward.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD866	Paragraph	4.16	Object					Considers paragraph 4.16 in relation to flexibility in the supply of housing land not to be positively prepared as lacks clarity and it is unclear to precisely what the flexibility factor means in practice and what degree of flexibility is involved. Unable to		Clarification as to what is meant by the flexibility factor, the size of the factor and whether it forms part of the plans proposed figure of 13,410. Clarification as to how it will work in practice and when it will come into play.	The flexibility factor is an amount of dwellings/percentage above the 13,410 housing requirement which allows for difficulties which will inevitably occur in bring forward some sites within the SHLAA within the plan period, as sites will lapse, viability may change and detailed site investigations may stall or delay sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								have full appreciation of the plans intention in this respect.							
Martin	Dixon		PD201	Paragraph	4.2	Object						Brownfield land must be prioritised especially in the city centre areas, particularly as viability can change over a period of time.	The new NPPF must be introduced and adhered to where brownfield sites must be closely scrutinised and thoroughly tested for viability	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has identified all available previously developed land in the SHLAA, which addresses the Council's approach to the viable use of brownfield land. The 2017 Viability Assessment has considered a number of different site typologies (including the re-use of City Centre sites) to determine whether sites are deliverable within the Plan period. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Martin	Dixon		PD199	Paragraph	4.15	Object						Objection on the grounds that the figures from the Experian report are varied and should not be relied on in isolation, and it is inaccurate to state that the development of houses leads to economic uplift.	Remove paragraph from the plan.	The Plan is based on a comprehensive and detailed evidence base. Further justification for the economic growth projections is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD238	Paragraph	4.26 to 4.29	Support						Hellens support paragraphs 4.26 to 4.29 and consider these paragraphs to be well-articulated and provides a sound basis for Green Belt release, one that is justified and consistent with national policy. Hellens find the approach taken by the LPA to be logical and justified to green belt release which; first identified the need for housing, then the maximum level of supply achievable in the LPA area and in neighbouring area; then assessed the most sustainable strategy for delivering the residual housing need and finally concluded that Green Belt release in the least sensitive and sustainable areas.	No modifications proposed.	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD167	Paragraph	4.26	Object					The paragraph is considered to unsound as alternatives options have not been considered nor exceptional circumstances demonstrated. An alternative site which is currently in the settlement break could be an alternative location for development. This site currently has a live planning application.	The paragraph is considered to unsound as alternatives options have not been considered nor exceptional circumstances demonstrated. An alternative site which is currently in the settlement break could be an alternative location for development. This site currently has a live planning application.	The paragraph should be deleted as it is not a sustainable statement.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The Council does not support the site proposed by the applicant at Hetton Bogs (SHLAA site 181) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 14) this site (represented by field parcel 1) provides strong Settlement Break purpose, helping to retain an impression of separateness and distinctiveness between Houghton-le-Spring and Hetton-le-Hole. The	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														field parcel also plays a key role in terms of green infrastructure, providing a buffer to Hetton Bogs SSSI and Local Nature Reserve, Hetton Houses Wood LWS (and Ancient Woodland), and providing foraging areas for priority species. This is a particularly sensitive site and already under pressure from people and domestic pets. Although the landowner puts forward a buffer along the southern edge of the site, this area effectively forms part of the functional floodplain and is undevelopable (affected by Flood Zone 3). The site also supports the west-east corridor that follows the Rough Dene Burn. The SHLAA provides additional constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 54-56), highlighting that the site is a former waste/landfill site and may therefore contain pollutants (and thereby potential for abnormal remediation costs).	
Colin	Ford		PD168	Paragraph	4.28	Object					The paragraph is not considered to be sound as exceptional circumstances have not been demonstrated, nor has sufficient consideration been given to non-green belt sites. The sites in the Settlement Break as Houghton le Spring is subject to a current planning application and demonstrates that this site is sustainable. It is therefore premature to amend the green belt at present when there are non green belt sites capable of being developed.	The paragraph is not considered to be sound as exceptional circumstances have not been demonstrated, nor has sufficient consideration been given to non-green belt sites. The sites in the Settlement Break as Houghton le Spring is subject to a current planning application and demonstrates that this site is sustainable. It is therefore premature to amend the green belt at present when there are non green belt sites capable of being developed.	Paragraph should be deleted as it is not a sustainable statement.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The Council does not support the site proposed by the applicant at Hetton Bogs (SHLAA site 181) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 14) this site (represented by field parcel 1) provides strong Settlement Break purpose, helping to retain an impression of separateness and distinctiveness between Houghton-le-Spring and Hetton-le-Hole. The field parcel also plays a key role in terms of green infrastructure, providing a buffer to Hetton Bogs SSSI and Local Nature Reserve, Hetton Houses Wood LWS (and Ancient Woodland), and providing foraging areas for priority species. This is a particularly sensitive site and already under pressure from people and domestic pets. Although the landowner puts forward a buffer along the southern edge of the site, this area effectively forms part of the functional floodplain and is undevelopable (affected by Flood Zone 3). The site also supports the west-east corridor that follows the Rough Dene Burn. The SHLAA provides additional constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 54-56), highlighting that the site is a former waste/landfill site and may therefore contain pollutants (and thereby potential for abnormal remediation costs).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ray	Delaney		PD29	Paragraph	4.28	Support						Mr Delany agrees with the amendment to the Green Belt boundary is the most sustainable option. Additionally agree that exceptional circumstances have been demonstrated.	No proposed modification	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD166	Paragraph	4.24	Object			Para 4.24 is considered to be unsound and inaccurate on the grounds that Mr Ford's site is located in the Settlement Break and could be developed without a major impact on the environment. The site is of a scale which is capable of		Para 4.24 is considered to be unsound and inaccurate on the grounds that Mr Ford's site is located in the Settlement Break and could be developed without a major impact on the environment. The site is of a scale which is capable of	Para 4.24 is considered to be unsound and inaccurate on the grounds that Mr Ford's site is located in the Settlement Break and could be developed without a major impact on the environment. The site is of a scale which is capable of	Although future development within the settlement breaks and open countryside has the potential to impact on both infrastructure and the environment it is considered that appropriately designed and scaled developments may	The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement (see Policy SP1). The justification for retaining the landowner's proposed development site at Hetton Bogs explained in Chapter 13 of the Settlement Break	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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									being development without adverse impacts on infrastructure. The paragraph is a generalisation and unsubstantiated.		being development without adverse impacts on infrastructure. The paragraph is a generalisation and unsubstantiated.	being development without adverse impacts on infrastructure. The paragraph is a generalisation and unsubstantiated.	be sustainably developed.	Report and in the Compliance Statement (Policy SP6) as follows: The Council does not support the site (SHLAA site 181) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 14) this site (represented by field parcel 1) provides strong Settlement Break purpose, helping to retain an impression of separateness and distinctiveness between Houghton-le-Spring and Hetton-le-Hole. The field parcel also plays a key role in terms of green infrastructure, providing a buffer to Hetton Bogs SSSI and Local Nature Reserve, Hetton Houses Wood LWS (and Ancient Woodland), and providing foraging areas for priority species. This is a particularly sensitive site and already under pressure from people and domestic pets. Although the landowner puts forward a buffer along the southern edge of the site, this area effectively forms part of the functional floodplain and is undevelopable (affected by Flood Zone 3). The site also supports the west-east corridor that follows the Rough Dene Burn. The SHLAA provides additional constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 54-56), highlighting that the site is a former waste/landfill site and may therefore contain pollutants (and thereby potential for abnormal remediation costs).	
Martin	Dixon		PD204	Paragraph	4.27	Object					Object on the grounds that large detached houses are not the focus of any government policy, there is not a shortfall of this type in the housing stock, they have poor density and will add to the City's urban sprawl. It is suggested that a more pressing priority is affordable housing or even luxury townhouses with access to a garden in the city centre.	Remove assertion within the paragraph that large detached houses are a priority in the Green Belt.	Par 4.27 indicates the city has a shortfall of larger detached properties as well as bungalows, through the relevant evidence, the SHMA. The SHMA also sets out the city's requirements for affordable housing. The reference to green belt land within this paragraph is not in relation to large detached houses being a priority in the green belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
	Unknown	Harworth Estates	PD2126	Paragraph	4.28	Object					Removing Green Belt land is not justified as the Council has not fully examined all other reasonable options and sites, such as at Ryehill (SHLAA site 715). It is considered that the approach is not consistent with national policy.	Removing Green Belt land is not justified as the Council has not fully examined all other reasonable options and sites, such as at Ryehill (SHLAA site 715). It is considered that the approach is not consistent with national policy.	No modifications proposed to paragraph.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement. The open countryside site submitted by Harworth Estates is referred to in detail in Policy SP6 The Coalfield.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		The Trustees of Athenaeum Pension Scheme	PD40	Paragraph	4.28	Support					Agree amendment to the Green Belt boundary is the most sustainable option. Additionally agree that exceptional circumstances have been demonstrated.	No modification proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
		NHS Sunderland CCG	PD67	Paragraph	4.31	Object		Considers paragraph 4.31 not positively prepared. Infrastructure Delivery Plan needs updating in terms of health care in relation to figures and infrastructure schedule.	Considers paragraph 4.31 not to be effective. Infrastructure Delivery Plan needs updating in terms of health care in relation to figures and infrastructure schedule.		Considers paragraph 4.31 not to be justified. Infrastructure Delivery Plan needs updating in terms of health care in relation to figures and infrastructure schedule.	Infrastructure Delivery Plan needs to be updated.	Comments noted. The Infrastructure Delivery Plan is a live document which will continue to be updated where an evidenced need for infrastructure is identified. The Council and NHS Sunderland CCG have signed a Statement of Common Ground and will continue to engage with Sunderland Clinical Commissioning Group with regard to health infrastructure requirements (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Martin	Dixon		PD205	Paragraph	4.3	Object					Considers paragraph 4.30 not to be justified as it sets out to protect green spaces and settlement breaks,	As the paragraph is contradictory to other reviews, further clarification is needed or it should be removed	The Settlement break review has concluded that particular areas could be removed from the settlement break and these areas have been taken into account in the plan. Paragraph 4.30 is in place to protect	The Council considers there have been no soundness or legal compliance issues raised by this representation which	

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												however the Settlement Break Review suggest that 35% of settlement breaks should be removed.	completely.	the remaining green spaces and settlement breaks.	require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD91	Figure	13	Support with mods						Historic England welcomes the recognition of the Sunderland Heritage Action Zone with policy SP", however it is not mentioned in the supporting text. Historic England request additional text to reflect the rich historic environment within the Urban Core.	Incorporate supporting text on the HAZ and text to recognise the historic importance of the urban core and how these could influence the design and contribute towards the authenticity, diversity and vibrancy of the area.	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. An addition modification is proposed (M19) within paragraph 4.35 to reflect this as part of a Statement of Common Ground between the Council and Historic England (SD.8k).	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.
Bob	Murray		PD4623	Policy	SP2	Object		Support objective of Policy SP2 to promote a leisure led mixed-use development, but is critical that this does not prejudice the future development or expansion of the Football Club. Concerns regarding parking, traffic congestion and pedestrian circulation implications of new development. Understand these matters will be addressed through forthcoming Stadium Village Masterplan. Policy should be conditional on development taking account of the principles and requirements set out in the Masterplan.	Support objective of Policy SP2 to promote a leisure led mixed-use development, but is critical that this does not prejudice the future development or expansion of the Football Club. Concerns regarding parking, traffic congestion and pedestrian circulation implications of new development. Understand these matters will be addressed through forthcoming Stadium Village Masterplan. Policy should be conditional on development taking account of the principles and requirements set out in the Masterplan.			Support objective of Policy SP2 to promote a leisure led mixed-use development, but is critical that this does not prejudice the future development or expansion of the Football Club. Concerns regarding parking, traffic congestion and pedestrian circulation implications of new development. Understand these matters will be addressed through forthcoming Stadium Village Masterplan. Policy should be conditional on development taking account of the principles and requirements set out in the Masterplan.	Amend Policy SP2 to require the development of Stadium Village to take into account the principles and requirements of the Stadium Village Masterplan.	Comment noted. The Council is preparing an SPD to guide the future development of the Stadium Village Area of Change. The Council recognise the importance of the football club to the city and will continue to liaise with SAFC in the preparation of the SPD.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dixon	Highways England	PD4840	Policy	SS1	Object			Highways England considers the Plan not to be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the			Highways England considers the Plan not to be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the

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									commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			<p>specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties.</p> <p>12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</p>
Barbara	Hooper	Historic England	PD93	Policy	SS1	Support						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.	No modification proposed	The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD92	Paragraph	4.37	Support						Historic England supports the intention to consider accessibility for all users as part of the Urban Core.	No modification proposed	The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3060	Policy	SS1	Object						Not justified because the range of uses should be expanded to include other uses within the current outline consent- food	The range of uses should be expanded to include other uses within the current outline consent- food and drink and multi-	The policy is consistent with the existing planning permission which is currently being implemented and is considered flexible.	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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												and drink and multi-storey car park.	storey car park.		require modifications to the Plan. Therefore no modifications are proposed.		
Richard	Cowen	CPRE North East	PD1383	Policy	SS1	Support						Support policy. Puts forward that house types should be mentioned for the Vaux site, as happens with other policies.	Mention house types.	Being a mixed use, brownfield site within the Urban Core it is not considered that the type of housing needs to be specified within the policy or background text, unlike the HGA's or SSGA which offer the opportunity to increase the amount of family homes within the city, in part due to their peripheral locations and greenfield status. The site will be limited in what it can provide due to the requirement for a minimum of 200 homes on a particular area of the site and the other uses that are also proposed for the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
S, Abrahams, PD5757 E, Adams, PD5049 Vicky, Adgar, PD4878 Dorrian, Affleck, PD2521 P, Aitken, PD1496 K, Aitken, PD854 George Edward, Alberts, PD3309 Paul, Aldridge, PD3440 Callum, Aldridge, PD1982 Dominic, Aldridge, PD1980 Alison, Aldridge, PD2006 Riley, Allen, PD4108 Olivia, Allen, PD4622 Susan, Alnwick, PD5207 Alan, Alnwick, PD5455 Alistair, Amour, PD5362 George, Anderson, PD3157 Caroline, Anderson, PD3195 Ava, Anderson, PD3131 George Noah, Anderson, PD3174 Gary, Anderson, PD3404 Carolyn, Anderson, PD2247 W, Ankers, PD2052 Paul, Appleton, PD5843 K H, Appleton, PD4109 Joan, Armstrong, PD4719 Clem, Armstrong, PD2103 Joan, Ashman, PD2969 A, Askew, PD2490 A, Askew, PD2567 Michelle, Aubert, PD4259 Carol, Baggaley, PD733 Paul, Balmer, PD1708 Tracy, Balmer, PD1706 Margaret, Banks, PD6031 Dan, Banning, PD2663 Matt, Banning, PD2489 Alan, Barber, PD2184 Ann, Barber, PD5727 Samantha, Barker, PD4170 Sandra, Barker, PD3945 Kenneth, Barker, PD4172 William, Barker, PD5859 Adam, Barnes, PD5188 Alison, Barnes, PD5745 E, Barrass, PD324 M, Barrass, PD329 A, Barrett, PD5453 Alice, Barron, PD5545 Amanda, Barron, PD4635 Sheila, Barron, PD4634 Linda, Barron, PD4736 Malcolm, Barron, PD4753 Amelia, Bateman, PD333 Deborah, Bateman, PD344 John, Bateman, PD2637 Jean, Bateman, PD2636 Peter, Beal, PD4950 Gillian, Beal, PD4937 H M, Bechkok, PD2433 AM, Bechkok, PD2456 Kimberly, Beckwith, PD3403 S, Bell, PD3800 Frances, Bell, PD3791 John, Bell, PD3113 Sheila, Bell, PD3108 I, Bell, PD5407 Angela, Bell, PD1839 Edna, Bell, PD4371 Alan, Bell, PD4368 Steve, Bell, PD2811 Catherine, Bell, PD1765 Nicci, Best, PD1669 Sally, Best, PD1073 Robert, Best, PD3050 Nick, Best, PD3608 Donna, Bishop, PD863 Christopher, Bishop, PD900 Wendy, Black, PD5738 George, Black, PD2127 Patricia, Black, PD1865 Deborah, Blackett, PD4974				Policy	SS2	Object				Object to policy SS2 on the following grounds; Site HGA1 will merge Springwell village with neighbouring settlements, this does not comply with national policy. Site HGA2 will merge Springwell village with Washington, there is concern that more than 60 homes will be built on the site and the bridge to the east is too narrow. HGA 3 will merge Washington with Springwell village. The infrastructure cannot cope and it is physically impossible to adequately change it to accommodate traffic.			Object to policy SS2 on the following grounds; Site HGA1 will merge Springwell village with neighbouring settlements, this does not comply with national policy. Site HGA2 will merge Springwell village with Washington, there is concern that more than 60 homes will be built on the site and the bridge to the east is too narrow. HGA 3 will merge Washington with Springwell village. The infrastructure cannot cope and it is physically impossible to adequately change it to accommodate traffic.	Object to policy SS2 on the following grounds; Site HGA1 will merge Springwell village with neighbouring settlements, this does not comply with national policy. Site HGA2 will merge Springwell village with Washington, there is concern that more than 60 homes will be built on the site and the bridge to the east is too narrow. HGA 3 will merge Washington with Springwell village. The infrastructure cannot cope and it is physically impossible to adequately change it to accommodate traffic.	No proposed modification.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. HGA1 and HGA 2 are considered to infill and round off edges of the existing village. They do not have a significant adverse impact on any function of the Green Belt. They do not contribute to the merging of settlements. The difference in distance between Springwell Village and Eighton Banks in Gateshead is negligible and Springwello Village and Washington are separated by the A194(M). A Transport Assessment has been prepared for all HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Assessment recommends that these sites are deliverable and will not have an unacceptable impact on the local or strategic network. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which includes contributions for highways and public transport amongst other infrastructure.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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David, Blackett, PD1473 Andrew, Blackett, PD1260 Emma, Blackett, PD3954 Fay, Blackie, PD5289 Michelle, Bland, PD2082 Simon, Bland, PD3201 Robert, Bloomfield, PD4376 Sharon, Bloomfield, PD4403 Lilian, Blue, PD1283 Frank, Blue, PD4721 Susan, Booker, PD1579 Howard, Booker, PD1560 Andrew D, Bosworth, PD339 Michelle, Bosworth, PD350 Angela, Bowe, PD3676 Kevin, Boyd, PD4921 Jennifer, Boyd, PD4110 Jennifer, Boyd, PD938 Nikki, Boyle, PD2938 A M, Bradford, PD2589 T E, Bradford, PD2573 Rebecca, Bradley, PD3678 Tilly, Brady, PD3143 Helen, Brady, PD5986 Stephen, Brady, PD3104 Marley, Brady, PD3953 Lee, Brebner, PD1931 Terry, Breerton, PD2129 Elisabeth, Brereton, PD2004 Kevin, Bricknall, PD357 Lynn, Bricknall, PD363 Mildred, Brodie, PD2443 ARTHUR, BRODIE, PD2423 Will, Brooke Lovell, PD6004 Evie, Brooke Lovell, PD6013 Carrie Ann, Brooke-Lovell, PD5807 M, Brooks, PD5074 Kristan, Brown, PD5665 T, Brown, PD5132 Katherine, Brown, PD2871 Malcolm, Brown, PD4162 Matthew, Brown, PD2838 Alexandra, Brown, PD2911 Steven, Brown, PD2828 Mary, Brown, PD6041 Dave, Brown, PD4025 Susan, Brown, PD5619 David, Brown, PD2468 Kenneth, Brunger, PD2066 Maurice, Bryson, PD3767 Jenna, Buglass, PD372 Gary, Bunt, PD5304 John, Burlinson, PD377 G, Burn, PD4375 F, Burn, PD4480 Carly, Burnett, PD881 Keith, Burnett, PD4065 Kathleen, Burns, PD992 Peter, Burns, PD3362 M, Burrows, PD2903 Paul, Burrows, PD2884 Jorja, Burrows, PD2931 Stephen, Butler, PD390 Mitchell, Butler, PD2534 Christine, Butler, PD384 Gary, Cairns, PD2923 Keith, Cameron, PD3334 Jacqueline, Cameron, PD3310 Ada, Carr, PD4519 Peter, Carr, PD4880 Vera, Carr, PD1843 W, Carrick, PD3198 Kathleen, Carroll, PD2805 Mary, Cartwright, PD1590 Peter, Cartwright, PD1484 Michael, Caruana, PD4130 Samantha, Carver, PD4221 Rachel, Chadwick, PD1284 Daniel, Chadwick, PD1285 Laura, Chambers, PD4267 Dorothy, Chandler, PD1928 Frank, Chandler, PD1886 Robert, Charlton, PD4780 Sarah, Charlton, PD4692 G, Chicken, PD2846 Ingrid, Chidgey, PD397 R W, Chilton, PD3829 Joan, Chilton, PD3883 Colin, Clark, PD2385 Maria, Clark, PD2470 M, Clark, PD2739 Brian, Clarke, PD405 Gina, Clarke, PD424 Victoria, Clayton, PD2131 Deborah, Clayton, PD1838 Ian, Clayton, PD2175 Lynn, Clayton, PD2081 Sophie, Cleasby, PD2488 A, Clements, PD2735 N D, Clements, PD2671 Marion, Coats, PD2397 Ron, Codling, PD3768														

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BM, Codling, PD3502 Alan, Coleclough, PD5098 Dorothy M, Coleclough, PD3574 James, Colledge, PD3078 Muriel, Colledge, PD3043 Alice, Colligan, PD4820 Elizabeth, Collins, PD3049 Laura, Condren, PD5424 Peter, Condren, PD5434 Olive, Cook, PD2610 Gemma, Cooke, PD4264 David, Cooper, PD2132 Evelyn, Cooper, PD1704 William, Cooper, PD3442 Carolyn J, Cooper, PD5332 Dave, Cooper, PD3232 Samuel, Cooper, PD429 Dawn, Cooper, PD3231 R L, Cooper, PD3463 Margaret, Copeland, PD2924 M, Corrigan, PD2043 Peter, Cottle, PD4929 Sara, Coulson, PD4543 Frances, Cowie, PD2854 Nicola, Cowie, PD1153 Niamh, Cowie, PD931 Hannah, Cowie, PD2473 Neil Edward, Cowie, PD2462 Melanie, Craig, PD5772 Dean, Craig, PD4778 Linda, Cryan, PD1096 J D, Cullen, PD3317 P W, Cullen, PD3291 P J, Cullen, PD2553 Beth, Cullen, PD5097 Richard, Curtis, PD5675 SARAH, CURTIS, PD5617 I, Dalby, PD1355 T, Dalby, PD1543 Anna, Dalby, PD4112 Steven, Dalby, PD3845 Imogen, Dalby, PD3869 Charlotte Elizabeth, Dalby, PD4119 M, Dawson, PD2995 A, Dawson, PD6019 Violet, Denham, PD439 Len, Denham, PD434 Dean, Derbyshire, PD5458 Joe, Devannney, PD450 Angela, Devannney, PD444 Jonathan, Dewart, PD2041 Bill, Dick, PD455 Christine, Dick, PD461 Ann, Dinning, PD5156 Alan, Dinning, PD5029 Sam, Dinsley, PD1561 Susan, Dinsley, PD1538 Shaun, Dinsley, PD1518 Brenda, Dodd, PD6030 E, Dodds, PD5392 J, Dodds, PD1643 John, Donnison, PD4930 Angela, Dover, PD5821 Keith, Dover, PD5820 John, Dowson, PD4266 Kristopher, Drummond, PD5816 Theo, Drummond, PD4672 Oliver, Drummond, PD4590 Kelly, Dryden, PD3562 Antony, Dryden, PD3717 Coel, Dryden, PD3720 Rhys, Dryden, PD3809 Katie, Dunbar, PD467 Kevin, Dunn, PD5102 Brian, Dunn, PD5679 Denise, Dunn, PD5645 Robert M, Edgar, PD3349 Patricia M, Edgar, PD3305 Vicki, Edmunds, PD4330 Janine, Edworthy, PD3193 Ian, Edworthy, PD5250 Bridget, Edworthy, PD3044 Miranda, Edworthy, PD3244 Paul, Ehrhardt, PD2299 Dianne, Ellwood, PD3110 William, Evans, PD5511 Joan, Evans, PD2549 Deborah, Ewart, PD4654 Kate, Ewart, PD5143 Stephen, Ewart, PD4646 Eleanor, Ewart, PD5160 James, Ewing, PD4372 Edward, Failles, PD1274 Maureen, Failles, PD1434 Amy, Falcus, PD3629 Craig, Falcus, PD3510 K, Faulkner, PD2689 N J, Faulkner, PD2715 Stephen, Fay, PD3834 Pauline, Fenwick, PD952 Colin, Fenwick, PD1055 David Alan, Fenwick, PD1281														

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Lynn, Fenwick, PD1327 Ronald, Ferguson, PD2128 E, Fife, PD4861 Amy, Fife, PD4906 Grahame, Fife, PD4907 Mark R, Fife, PD2472 Julie, Fife, PD2598 Adam, Finch, PD4825 Terry, Firman, PD1080 James Donnison, Fletcher, PD1150 O, Fletcher, PD1030 D, Flinn, PD5982 C A, Flinn, PD5919 R, Florance, PD1451 Heather, Florance, PD5770 Neil, Foggin, PD4787 Sandra, Foggin, PD2248 DW, Foggin, PD2214 Jacquelin, Foggin, PD4877 Brenda, Foote, PD3899 Richard, Foreman, PD5222 Jeannette, Forrester, PD6029 Steven, Forster, PD5850 J, Forster, PD2501 Sonia, Forster, PD3811 David, Forster, PD3955 Heather, Forster, PD472 Janine, Forster, PD1553 Elsie, Foster, PD3798 Cliff, Fothergill, PD4642 Elaine, Fothergill, PD4560 Stacie, Fothergill, PD4544 Hazel, Framingham, PD478 Heather, Francios, PD4528 Kenneth, Francios, PD4579 Isabel, Franklin, PD5287 Mark, Franklin, PD5130 Peter, Franklin, PD4020 M, Freeman, PD1919 JG, French, PD826 V, French, PD845 P, Gale, PD5987 Deborah, Gallagher, PD1124 John, Gallagher, PD2207 Tom, Gallagher, PD2341 John, Gallagher (Senior), PD2313 Katrina, Garnett, PD3719, Linda, Garnett, PD3045, Ronald, Garnett, PD2646, S, Garrett, PD2566, D, Garrett, PD1635, Craig, Gartland, PD3925, Emma, Gatens, PD1667, Mark, Gatens, PD1633, James, Gatens, PD2348, Amelia, Gatens, PD2146, Dawn, Gauld, PD4203, Chris, Gibson, PD4230, Ravender, Gill, PD3515, Zac, Gillbanks, PD5674, Ann Marie, Gillbanks, PD5565, Julie, Giloney, PD4421, M E, Glaister, PD2387, Lesley, Godfrey, PD5280, Julie, Goding, PD4281, Keeley, Gordon, PD483, Phil, Gordon, PD489, Christine, Goss, PD4472, Sarah, Gough, PD3726, David, Grady, PD3285, Janice, Graham, PD494, Colin, Gransbury, PD2213, Irene, Gransbury, PD2212, Carl John, Grant, PD501, Margaret Ann, Grant, PD506, Peter Alexander, Grant, PD5187, Ann Mildred, Grant, PD2921, Ronald Malcolm, Grant, PD2847, Paul, Gray, PD2268, Chris, Green, PD1217, Jean, Green, PD3503, Philip, Greenup, PD1954, Catherine, Greenup, PD1955, Kate, Gregory, PD5533, Ben, Gregory, PD5597, Josh, Grey, PD5465, Stuart, Griffiths, PD4317, Lucy, Griffiths, PD4524, Claire, Guy, PD4722, Susan, Hall, PD1411, Adam, Hall, PD5050, Stephen, Hall, PD4393, Roslyn, Hall, PD4429, Julie, Hall, PD2670, Jonathan, Hall, PD1906, Maureen, Hamilton, PD1351, Elaine, Hamilton, PD1350, Valerie, Hancock, PD2400, John, Hancock, PD5171, Joanna, Hand, PD516, Christopher, Hand, PD511, Denise, Hannan, PD521,														

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<p>Jake, Hannan, PD1929, Mark, Hannan, PD1805, Paul, Hanson, PD3208, Louise, Hanson, PD3261, Michael, Harding, PD5252, Michael, Harding, PD5251, Stuart, Harding, PD2425, Sophie, Harding, PD2296, Emma, Hardy, PD2662, Angela, Hardy, PD2426, Adam, Harper, PD2221, Lisa, Harris, PD3558, Ian, Harris, PD3559, Paul, Harris, PD2109, Anna Marie, Harris, PD3557, Gillien, Harris, PD1820, Janet, Harrison, PD2920, Andrew, Hartley, PD3469, Naomi, Hartley, PD3444, Aurora, Hartley-Hewitson, PD5546 Lynn, Hartridge, PD3373, Allen, Hartridge, PD1749, Demi, Hawyes, PD527, Margaret, Haywood, PD5084, Nigel, Hems, PD4686, Gemma, Henderson, PD3821, E, Henderson, PD3342, K, Hepburn, PD3916, Wendy, Hewitson, PD3414, Kasia, Heywood, PD2199, Phillip, Higgins, PD4809, David, Higgins, PD3771, Pauline, Higgins, PD3745, Geoffrey, Higgins, PD3730, R, Hillier, PD1113, E, Hillier, PD3288, Callum, Hills, PD2319, Karen, Hills, PD3080, Kenneth, Hills, PD3233, Michael, Hills, PD2108, Caroline, Hills, PD3082, Michelle, Hills, PD2337, Andy, Hird, PD3063, Ruth, Hirst, PD4689, Margaret, Hodgson, PD1349, Elizabeth, Hogg, PD4076, Michael, Hogg, PD5099, Paris, Holland, PD5771, Janice, Holmes, PD4585, Rhiannon, Holmes, PD4318, Trevor, Holmes, PD4319, Bill, Holmes, PD5468, S M, Holt, PD1275, Allen, Hope, PD1241, Ryan, Hope, PD2634, Andrea, Hope, PD5506, Elonor, Horne, PD2525, Sarah, Horne, PD1547, Joyce, Horne, PD1691, Gary, Horne, PD3462, David, Horrigan, PD2967, Sarah, Horrigan, PD2798, Jane, Horrigan, PD2797, Keith, Horrigan, PD2968, Norma, Houghton, PD3200, Stephen, Houghton, PD1741, Amelia, Hudson, PD3052, Stephen, Hudson, PD3617, Isabella, Hudson Walker, PD534 Marc, Hughes, PD8314, Nicola, Hurst, PD1764, Jess, Illingworth, PD2621, David, Ingram, PD4027, Sue, Ingram, PD4007, E, Irwin, PD2427, Robert, Jackson, PD4413, Donna, Jackson, PD4414, Stella, Jacques, PD652, W, Jacques, PD2597, Mark, Jahn, PD2021, Janet, Jamieson, PD2552, Norman, Jamieson, PD2550, M A, Jennings, PD1884, John, Jennings, PD5648, J, Jeruskau, PD4285, L, Jobling, PD1095, Alma, Jobling, PD3504, D, Jobling, PD1090, Peter, Jobling, PD4482, Gavin, Johnson, PD5024, Robert, Johnson, PD5740, Mavis, Johnson, PD2672, Catherine, Johnson, PD4279, Relia, Jonas, PD5961, L, Jones, PD5742, SA, Jones, PD5870, Jensen, Jones, PD3561, Elliot, Jones, PD3607, Sarah, Jordison, PD4023, Brian, Jordison, PD4021, Ann Lorraine, Jordison, PD5973, Kristian, Judge, PD539,</p>														

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Linda, Judge, PD544, Dennis, Judge, PD5396, Gregory, Kaszefko, PD4598, Suzie, Kaszefko, PD4889, Surena, Kaur, PD3478, Anisha, Kaur, PD3453, Francesca, Keith, PD554, Alexander, Keith, PD549, Tony, Kelly, PD5181, Claire, Kelly, PD1731, Ronan, Kenny, PD2568, Diana, Kenny, PD1185, Lisa, Kimber, PD2243, Sean, Klein, PD5507, Dennis, Lambton, PD5193, Christopher, Lane, PD4936, Caroline, Lane, PD4873, Joanne, Langley, PD5256, David, Langley, PD4818, Zack, Langley, PD5390, Katie, Langley, PD5902, Abbie, Langley, PD1322, Will, Langley, PD1345, Beth, Lawrence, PD2072, Lyn, Laws, PD3464, Victoria, Laws, PD4553, David, Leach, PD4570, Audrey, Leach, PD5774, Vivienne, Lee, PD4092, M, Lewins, PD4781, W, Lewins, PD4782, Joan, Liddle, PD3970, Wendy, Lindsay, PD4171, Joanne, Lisgo, PD2402, Richard, Littlejohn, PD4716, M, Livingstone, PD2596, Michele, Llanaez, PD5951, Dan, Llanaez, PD5062, Olivia, Llanaez, PD5061, Danielle, Llanaez, PD4972, Amanda, Llanaez, PD4968, Morgan, Llanaez, PD4720, Annie, Loadman, PD3614, Alison Jane, Logan, PD5804, Stuart, Logan, PD5684, Annabel, Logan, PD5646, Rachel, Luke, PD3706, Stephen, Luke, PD3680, Richard, Lumsdon, PD5570, Gemma, Lumsdon, PD5539, Peter, Lynn, PD1384, Carol, Lynn, PD1422, Louise, Lynn, PD3610, Helen, MacKay, PD559, Frank, Maghie, PD565, Stephanie, Mallam, PD4328, Ann, Manning, PD5034, Vahik, Mardirossian, PD1021, Emily Jane, Marriner, PD571, Amy, Marshall, PD1546, Elizabeth, Martin, PD3160, Amelia, Maxwell, PD758, Magdalena, Mazurek, PD4658, Malcolm, McArthur, PD962, Margaret, McArthur, PD314, Norma, McBride, PD1502, Thomas, McBride, PD3122, Kim, McBride, PD1529, Shaun, McCaffery, PD2885, S, McCaffery, PD2776, Jacqueline, Mccaffrey, PD4962, David, McCaffrey, PD4978, T, McCartney, PD5295, D E, McCartney, PD5263, David, McClerence, PD5851, Ann, McCulla, PD3723, Andrew, McCulla, PD3685, Steven, McGill, PD4034, Karen, McGill, PD3999, Lee, McGill, PD3698, Craig, McGill, PD4078, Lynn, McInnes, PD4412, R, McInnes, PD5293, F, McInnes, PD5504, Gwynneth, McIntyre, PD3265, Daniel, McIntyre, PD3278, Brett, McIntyre, PD5614, A E, McKeon, PD4859, J, McKeon, PD4860, Claire, McLean, PD3675, Gillian, McMahan, PD1472, Claire, McMillan, PD4723, Emily, McNulty, PD5714, Gillian, McNulty, PD5683, Sophie, McNulty, PD5656, Greg, McPeake, PD576, Tracy, McPeake, PD583, C, Meek, PD2068, D, Meek, PD1202, I, Metcalf, PD2925, Alan, Milburn, PD3736, Denise, Milburn, PD1663,														

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<p>Susanne, Miller, PD1595, Audrey, Miller, PD1044, Richard, Miller, PD3952, E.Joan, Miller, PD5012, Graeme, Miller, PD1748, Garry, Miller, PD2253, Louise, Miller, PD4359, PM, Miller, PD3979, E, Mitton, PD5060, Maureen, Monaghan, PD1750, Ron, Monaghan, PD2179, D, Moore, PD5853, Daniel, Moravanszky, PD2487, Leon, Morgan, PD1061, Marian, Morgan, PD1047, V, Morgan, PD2083, Bill, Morrell, PD1438, Yvonne, Morrell, PD1436, Edith, Morris, PD4083, Andrea, Morris, PD4137, Ray, Morris, PD1348, Patricia, Morris, PD1152, David, Morris, PD781, Brian, Morrissey, PD2711, Maureen, Morrow, PD1010, Peter, Mossop, PD1842, Rhoda, Mossop, PD1841, Tim, Mount, PD1323, D, Mulholland, PD1645, Jean, Mulholland, PD1716, James, Mulholland, PD1692, Lindsey, Mulholland, PD1705, G, Mullen, PD2794, J G, Mullen, PD2734, Sue, Murdy, PD5264, Clifford, Murdy, PD5718, Daniel, Murison, PD4193, Erik, Murison, PD2134, Colin, Murison, PD3787, Elizabeth, Murison, PD3813, Emily, Murison, PD2155, J, Murison, PD2171, M, Murison, PD4177, Bethany, Murison, PD4214, Kathryn, Murison, PD4243, Kelly, Murray, PD1837, Elizabeth, Myers, PD2198, George, Myers, PD2067, Iris, Myers, PD1280, Ian, Nelson, PD5133, C, Nelson, PD5333, Paul, Nelson, PD1840, Rachel, Nelson, PD1766, P, Nelson, PD5190, John, Nesbit, PD4017, Clare, Nesbit, PD4237, John, Nesbitt, PD1215, Alison, Nesbitt, PD2702, Scott, Nesbitt, PD2703, Rachel, Nesbitt, PD1432, Jordan, Nesbitt, PD2704, Conor, Nesbitt, PD2705, Stephen, Nesbitt, PD2707, Danielle, Nesbitt, PD5893, Margaret, Nesbitt, PD3192, R, Neville, PD5563, C, Neville, PD5615, Sheila, Nuttall, PD3273, Dennis, Nuttall, PD3290, Lynda, O'Leary, PD4945, Debbie, Oliver, PD5313, S, Oliver, PD3029, Elizabeth, Oliver, PD3023, Eric, Oliver, PD2978, Gwenyth, Oliver, PD2961, Melissa, Oliver, PD3384, Kevin, O'Neill, PD3616, Kevin, O'Sullivan, PD595, Elizabeth, O'Sullivan, PD589, Alan, Oxley, PD3944, P, Panther, PD5514, Grahame, Parker, PD999, Catherine, Parker, PD1276, Keith, Parker, PD8518, Christopher, Parker, PD5182, Katie, Parker, PD5809, Fiona, Parker, PD2856, M, Parkin, PD3191, George, Parkin, PD3190, Susan, Patrick, PD8296, R, Patterson, PD1540, Daniel, Patterson, PD1199, Andrew, Patterson, PD1679, Matthew, Patterson, PD1239, Victoria, Patterson, PD1154, W A, Pattison, PD1808, E.D, Pattison, PD1807, Talia, Payne, PD4202, Malachi, Payne, PD4788, Michael, Payne, PD4747, A H, Pearce, PD3358, Joan, Pearson, PD3316,</p>														

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<p>Jim, Pearson, PD3483, Amanda, Pearson, PD3605, Patricia, Peele, PD3458, Chris, Pescod, PD601, Adrian, Pickering, PD5131, Janet, Pickering, PD609, K, Pickup, PD5495, David, Pickup, PD5587, Thomas, Pickup, PD5573, Dale, Pilkington-Smith, PD1176, Sheila, Platt, PD3844, Judith, Platt, PD2368, Jeffrey, Platt, PD3879, Karen, Pooley, PD5380, Keian, Pooley, PD5943, Tazmin, Pooley, PD5825, Ryan, Pooley, PD5780, Dillion, Pooley, PD5739, John, Pooley, PD5704, Tarryn, Pooley, PD3934, William, Portsmouth, PD5544, Mark William, Portsmouth, PD5549, George, Postle, PD4520, L, Potter, PD3081, S, Potter, PD3109, N, Potter, PD5558, Samantha, Potts, PD4603, Shauni, Pringle, PD2323, Janice, Pringle, PD2320, Tracey, Pyburn, PD622, Luke, Pylan, PD615, Jon, Quine, PD5191, Helen, Quinn, PD2855, Robert, Quinn, PD2736, Margaret, Quinn, PD3487, L, Rae, PD631, D, Rae, PD5369, Nicola, Rae, PD1880, Ian, Ramsay, PD3657, Wendy, Ramsey, PD641, Jacob, Ramshaw, PD5813, Rosie, Ramshaw, PD5996, Joanne, Ramshaw, PD5970, James, Ramshaw, PD3171, James, Ray, PD5811, Rachel, Ray, PD5910, K, Reay, PD1545, Laurence, Reay, PD968, Simon, Reay, PD951, Christopher, Reay, PD2258, Janet, Regan, PD2359, Lisa, Reid, PD1353, Craig, Reid, PD5041, Anne, Rennie, PD661, Michael, Rennie, PD666, Stephen, Reveley, PD775, Julie, Reveley, PD3118, Alexia, Reynolds, PD1342, Jorge, Reynolds, PD1341, Gillian, Reynolds, PD1198, Anthony, Reynolds, PD1197, Amelia, Reynolds, PD1196, Malcolm, Richardson, PD1617, Claire, Richardson, PD971, Susan, Richardson, PD1651, J, Richardson, PD1632, Katrina, Ridley, PD691, Christopher, Ridley, PD673, Julie, Ridley, PD5290, Graeme, Ridley, PD2288, Catherine, Ritchie, PD701, Robin, Ritzema, PD3395, Linda, Ritzema, PD3394, Philip, Ritzema, PD4503, William, Robertson Walker, PD738, Amie, Robinson, PD4305, Ruth, Robinson, PD3991, Maureen, Robinson, PD4569, Keith, Robinson, PD4489, Kate, Robinson, PD1956, Callum, Robinson, PD5170, Hannah, Robinson, PD4802, Nicole, Robinson, PD5394, John, Robinson, PD2781, Maureen, Robinson, PD2783, Will, Robinson, PD2782, Simon, Robinson, PD727, Peter, Robinson, PD714, Evan, Robinson, PD4969, Sharon, Robinson, PD8328, Yvonne, Robson, PD4306, Dorothy, Robson, PD2295, Owen, Robson, PD5887, Les, Robson, PD1414, Luke, Robson, PD5126, Jane, Robson, PD5795, Gordon Alan, Robson, PD5907, Lyndsey, Robson, PD5906, T, Robson, PD4189, Kenneth, Robson, PD2367, Rachael, Rodger, PD2020, Julie, Rodger, PD2019,</p>														

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<p>S, Rodger, PD2018, Lindsey, Ross, PD2173, Erlinda, Ross, PD2174, Lucy, Rouse, PD1920, Charlie, Rouse, PD1981, Millie, Rouse, PD1887, Paul, Routledge, PD3417, Brian, Rowntree, PD3755, P, Rudd, PD5093, Steven, Sambers, PD4232, Joss, Savory, PD3140, Angela, Savory, PD3170, Jason, Sayers, PD4353, T, Scott, PD5594, M, Scott, PD5754, Bryan, Scott, PD2200, Madeleine, Scott-Gray, PD2611, Irene, Searle, PD813, Ronnie, Senior, PD1593, Betty, Senior, PD1594, Chris, Shaftoe, PD5391, Pauline, Shaftoe, PD6043, Tom, Shaftoe, PD1479, Suzanne, Shaftoe, PD1480, Kevin, Sheppard, PD2003, Mason, Shotton, PD2418, Tristan, Simpson, PD5823, June, Simpson, PD3654, George, Simpson, PD4665, Debbie, Simpson, PD4666, Ronald John, Simpson, PD754, Chris, Simpson, PD746, Amer, Singh, PD3493, Greg, Skeoch, PD5650, Rachel, Skeoch, PD5651, Joan, Slowther, PD4688, Kenneth, Slowther, PD5960, Doreen, Smith, PD1793, Kelly, Smith, PD6187, Jordan, Smith, PD6159, John, Smith, PD1385, Joan, Smith, PD1597, Charlotte, Smith, PD3443, Raymond, Smith, PD998, Anita, Smith, PD1259, John, Smith, PD1291, Morris, Smith, PD1792, Susan, Smith, PD1481, Ian, Stafford, PD4254, June, Stafford, PD4276, Jessica, Stafford, PD5169, Alan, Stavers, PD4401, Jayne, Steanson, PD4636, Anna, Steanson, PD4484, Olivia, Steanson, PD4572, Mark, Steanson, PD4566, Marjorie, Stephenson, PD3946, Carole, Stephenson, PD1889, Peter, Sterling, PD3543, A, Stevens, PD2010, Alan, Stoddart, PD763, Alison, Stoddart, PD5240, Irene, Stoker, PD2249, H, Stoker, PD2297, Catherine, Stokoe, PD2922, Craig, Stokoe, PD3563, Dan, Stokoe, PD3810, Matthew, Stubbs, PD4068, T, Suchecki, PD5818, David, Sunley, PD2079, Lynda, Sutton, PD4154, Paul, Sutton, PD4144, Deborah, Swaddle, PD925, Michelle, Sweeney, PD770, P, Sweeney, PD1214, Barry, Taylor, PD3361, Gordon, Taylor, PD3622, Ben, Taylor, PD3650, G, Taylor, PD799, B, Taylor, PD787, Linsey, Taylor, PD3556, Greg, Taylor, PD5395, Mollie, Taylor, PD3430, David, Taylor, PD3534, Joshua, Taylor, PD3592, Jean, Taylor, PD5291, Lynn, Taylor, PD3659, Neil, Taylor, PD1963, Joyce, Taylor, PD1945, Steve C, Templeman, PD4521, Martin, Terry, PD5547, Joyce, Tetlow, PD5292, Kathryn, Tew, PD3344, F J, Thirlaway, PD2365, I, Thirlaway, PD2366, Jo, Thomas, PD8524, Jeremy, Thomas, PD1126, Steve, Thomas, PD3526, Delice V, Thompson, PD1883, Jack, Thompson, PD4048, Angela, Thompson, PD1770, David, Thompson, PD1769,</p>														

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Daniel, Thompson, PD4999, Andrew, Thompson, PD5388, Claire, Thompson, PD5459, Gladys, Thompson, PD3119, Allan, Thompson, PD1735, Chris, Thomson, PD4852, Maxine, Thornley, PD5342, Heather, Thornley, PD5423, Alex, Thornley, PD5541, Leanne, Tiffen, PD3003, Eva, Tiffen, PD1064, Alan, Tiffen, PD1033, Janette, Tiffen, PD2965, Terence, Tiffen, PD3035, Darren, Tiffen, PD3753, David, Todd, PD4204, James, Tracey, PD1972, Claire, Treadwell, PD3850, Sam, Treadwell, PD3849, John, Trewwhitt, PD4882, M, Trewwhitt, PD1707, Leslie, Trotter, PD2317, Lewis, Tuff, PD4610, Dianne, Tully, PD4018, John, Turnbull, PD5854, Clare, Turnbull, PD828, J H, Turnbull, PD1648, Emma, Turnbull, PD2529, Maureen, Turnbull, PD1646, Tracy, Turnbull, PD5328, Malcolm, Turnbull, PD4229, M, Turner, PD1413, Erin, Urwin, PD839, Nancy, Urwin, PD4449, Christine, Urwin, PD2378, Ray, Urwin, PD2306, Gemma, Venus, PD1398, Martin, Venus, PD821, Carole, Vorley, PD794, Neil, Waite, PD4785, Pauline, Waite, PD6042, Jill, Waite, PD5609, Michael, Wales, PD4411, Daniel, Wales, PD4457, Debbie Jane, Walker, PD850, Florence, Walker, PD1100, Amanda, Wallace, PD744, William James, Ward, PD983, Christina, Ward, PD3006, James, Warne, PD3286, Lynne, Warne, PD2845, Maureen, Watson, PD4833, H, Watson, PD1151, J, Watson, PD1077, Danielle, Watson, PD867, Joanne, Watson, PD879, Paul, Watson, PD901, Julie, Watson, PD4773, Laura, Watson, PD5471, Martin, Watson, PD5331, J T, Watson, PD4601, David, Watson, PD6008, Veronica, Watson, PD5897, Peter, Watson, PD5463, P, Weatherburn, PD3896, Malcolm, Weatherburn, PD4493, Xenia, Webster, PD1791, Mark, Weddle, PD912, Julie, Weedy, PD1200, Helen, Weir, PD4107, David, Weir, PD4098, Eileen, West, PD2897, R A, White, PD1114, Ann, White, PD1125, D, Whitfield, PD1463, F, Whitfield, PD1448, Maureen, Whittaker, PD1016, Matty, Wild, PD5904, K, Wilkinson, PD702, D, Wilkinson, PD719, G, Wilkinson, PD2761, Helen, Wilkinson, PD2738, M, Wilkinson, PD687, J, Wilkinson, PD671, Eleanor, Williams, PD3851, Phillip, Williams, PD4987, Lucy, Williams, PD4019, Carl, Williams, PD4687, L, Williams, PD4523, Lee, Williams, PD917, Thomas, Williams, PD2133, Sara, Williams, PD926, Sylvia, Williams, PD2837, Brian, Williams, PD2777, Laura, Williams, PD5676, Brenda, Wilson, PD6007, Katie, Wilson, PD5899, Oliver, Wilson, PD4973, Deborah, Wilson, PD5637, James, Wilson, PD5551, Melanie, Wilson, PD638, CH, Wood, PD1093,														

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Clare, Wood, PD4015, Dale Royce, Wood, PD5505, M, Wood, PD943, J, Wood, PD2507, Ciaran, Wood, PD3887, Madaleine, Wood, PD3863, M, Wood, PD3703, Michelle, Wood, PD3396, Stephen, Woodbridge, PD3284, Lucy, Woolley, PD2661, David, Woolley, PD2612, S, Wright, PD4338, Nicola, Wylde, PD2853, Barry, Wylde, PD3105, Gary, Yeaman, PD4410, Olivia, Yeaman, PD5228, Miley, Yeaman, PD4316, Danielle, Yeoman, PD3801, John, Young, PD5122, Helen, Young, PD4911,															
Dominic, Armstrong, PD779 LINDA, ATCHISON, PD75 louise, bailey, PD79 Alan, Baldwin, PD247 Alan, Batey, PD46 Lesley, Beckwith, PD249 Bellenger, PD21 Martin, Dixon, PD253 Joanne, Dover, PD18 Robert, Glanville, PD44 Allison, Goundry, PD230 Amelia, Hudson, PD47 Stephen, Hudson, PD48 Graeme, Lauderdale, PD88 John, Lunn, PD20 Victoria, Parkinson, PD45 Wayne, Renney, PD50 Aaron, Reynolds, PD245 James, Robinson, PD137 Carriann, Swales, PD49 Kathleen, Taylor, PD23 Andrew, Taylor, PD17 William, Taylor, PD19 Dionne, Taylor, PD24 Michael, Trainer, PD235 Michael, Trainer, PD16 Carlton, West, PD61 Kirsty, West, PD22 Karen, Westcott, PD139 Janet, Whitfield, PD142				Policy	SS2	Object	Object to the site as not positively prepared as the Local Authority have submitted an out of date playing pitch plan to justify the site is surplus to requirements. New plan not being prepared until 20121.	Object to the site as not being effective as Sunderland has largest problems in region with regards obesity, mental health and inactivity. Playing fields, green spaces and sport are good reasons to reduce this and cost effective in reducing health effects long term. A			Object to the site as not being consistent with National Policy in relation to development on playing fields. Failed to cover consider any of the exceptions that Sport England would consider. Playing fields should be protected in line with NPPF.	Object to site as not justified due to the growth in football and sport in the area will leave this area short of facilities. Local club want to take over the site and invest in it for sporting facilities for the community.	Proposed modification would be to remove the site from the plan in full or Local Authority supply a piece of land to same equivalent as per Sport England guidance.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019.If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
Regeneration and Property	Sunderland City Council		PD3274	Policy	SS2	Support					2 Sustainable sites. Site at Fatfield has extensive amounts of greenspace, so greenspace loss to area is low impact. Site has good road links, bus links and local connections, and has low flood risk. Very marketable area - site lends itself to self-build/custom-build executive development. Site at Rickleton has considerable amounts of amenity greenspace nearby, and has good connections to strategic road network. Development of this site would provide the much needed high quality housing that will be attractive to and therefore retain working families. Subject to it being declared surplus to requirements by Sport England	No proposed modifications.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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												following the next Play Pitch Plan Review in 2021.			
Amy F	Ward	Barratt David Wilson Homes	PD5269	Policy	SP3	Object		The Local Plan evidence support Land East of Washington to be removed from the Green Belt, however, Barratt David Wilson Homes (BDW) consider this site should be allocated. This site would not have a material impact on the Green Belt, and is a highly sustainable locations on the edge of the built up area. It does not serve as Green Belt purposes and as such development would create a logical long term boundary.	The Local Plan evidence support Land East of Washington to be removed from the Green Belt, however, Barratt David Wilson Homes (BDW) consider this site should be allocated. This site would not have a material impact on the Green Belt, and is a highly sustainable locations on the edge of the built up area. It does not serve as Green Belt purposes and as such development would create a logical long term boundary.		The Local Plan evidence support Land East of Washington to be removed from the Green Belt, however, Barratt David Wilson Homes (BDW) consider this site should be allocated. This site would not have a material impact on the Green Belt, and is a highly sustainable locations on the edge of the built up area. It does not serve as Green Belt purposes and as such development would create a logical long term boundary.	The Local Plan evidence support Land East of Washington to be removed from the Green Belt, however, Barratt David Wilson Homes (BDW) consider this site should be allocated. This site would not have a material impact on the Green Belt, and is a highly sustainable locations on the edge of the built up area. It does not serve as Green Belt purposes and as such development would create a logical long term boundary.	Allocate land east of Washington for housing	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 demonstrates that land east of Washington (put forward by Barratts) has moderate impact on Green Belt purpose (see pages 135 and 179), in particular in relation to countryside openness and urban sprawl. On site, the area clearly consists of open countryside, which is further underlined by the nature of the site being physically detached from neighbouring residential areas to the west by the Leamside Line corridor. From the edge of the Leamside Line and to the north of the employment land that flanks Washington Road, the landscape is immediately flat and open and dominated by large agricultural fields, stretching into the distance, and supporting the wide stretch of Green Belt countryside that serves to separate Sunderland and Washington from Gateshead and South Tyneside. The Council does not consider it appropriate to allocate the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5300	Policy	SS2	Object		Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.		Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Incorporate a flexible approach to housing deliver and increase the housing requirement.	The site specific policies have been developed to ensure the right types of homes are delivered in these greenfield, peripheral locations which will contribute towards meeting the overall housing needs of the city, making best use of the available sites and locations and protecting the existing environment and in some cases sensitive locations. The Council considers that the level of detail is appropriate and the approach is sound, enabling in particular that a number of sensitive site issues are identified and addressed, and specifically addressed at the planning application stage. The Policy is supported and justified by the Development Frameworks (2018) which provide details on the constraints together with recommendations for development principles and parameters to guide development of these sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mary	Peel		PD8413	Policy	SS2	Object			Concerns that Springwell is a village and release of the Green Belt at HGA sites 1,2 & 3 will join Springwell to Washington, which is not in line with national policy. Concern that the proposed number of houses for HGA sites will increase beyond that proposed and the number of additional vehicles generated from the developments will place increased pressure on the road network in Springwell, which is already at capacity and incapable of upgrade/improvements.		Concerns that Springwell is a village and release of the Green Belt at HGA sites 1,2 & 3 will join Springwell to Washington, which is not in line with national policy. Concern that the proposed number of houses for HGA sites will increase beyond that proposed and the number of additional vehicles generated from the developments will place increased pressure on the road network in Springwell, which is already at capacity and incapable of upgrade/improvements.	Concerns that Springwell is a village and release of the Green Belt at HGA sites 1,2 & 3 will join Springwell to Washington, which is not in line with national policy. Concern that the proposed number of houses for HGA sites will increase beyond that proposed and the number of additional vehicles generated from the developments will place increased pressure on the road network in Springwell, which is already at capacity and incapable of upgrade/improvements.	No Modification proposed.	The Council considers the Policy to be sound. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification for these Policies and sites can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.</p>	
Mark R	Fife		PD298	Policy	SP3	Object						<p>Considers policy SP3, with particular reference to sites within Springwell Village, HGA1 and HGA2 not to be justified as do not consider that all the brownfield site options have been considered. Brownfield sites need to be made more attractive and council must work towards offering brownfield sites at a lower price. Suggests bringing empty properties back into use and building new council housing. Release of green belt land lead to urban sprawl and merging of areas. Impact of development on infrastructure.</p>	No Modification proposed.	<p>The Council has prioritised the development of brownfield sites, increased densities and considered empty properties where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification for these Policies and sites can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Peter	Hannah		PD322	Policy	SS2	Object						<p>Considers policy SS2, with particular reference to HGA6 Rickleton not</p>	Do not proceed with development plan to destroy designated greenbelt on HGA6.	<p>The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land</p>	<p>Development of the site can only take place subject to an up-to-date Playing Pitch</p>

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											justified. Council judged that development on the site would have high impact with significant mitigation required and site not suitable as such did not carry out infrastructure and services assessments. Goes against Policy NE4 which seeks to protect greenspace. No evidence of planning to cope with the impact of the new development.		according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. An additional modification is proposed to SS2: HGA6 to clarify the Council's position (M22).	<u>needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
Nick	McClellan	Story Homes	PD5598	Policy	SS2	Support with mods		Consultee broadly supports Policy SS2 but minor amendments should be made to align policy better to the NPPF. Specifically in relation to HGA4, the consultee puts forward that a larger 18 hectare site should be supported (340 homes). States that current boundary of HGA4 does not follow physical features that are readily recognisable. Strongly supports the word "approximately" in relation to housing numbers. Puts forward that HGA4 sub point (iii) should be removed and puts forward rewording of (vii) to "be of high architectural quality to reflect the local vernacular and seek to retain long distance views to the northern edge." Specifically in relation to HGA2, it is put forward that the HGA boundary should also include the adjacent safeguarded land. HGA2 (i) would "deliver approximately 140 new homes"; sub-point (iv) altered to "seek to retain" long distance views to the southern edge of the development from the south"; sub-point (vi) altered to "include additional buffers "mitigation and/or design" as necessary..."; sub-point (viii) altered to "retain healthy trees and hedgerows where possible".		Consultee broadly supports Policy SS2 but minor amendments should be made to align policy better to the NPPF. Specifically in relation to HGA4, the consultee puts forward that a larger 18 hectare site should be supported (340 homes). States that current boundary of HGA4 does not follow physical features that are readily recognisable. Strongly supports the word "approximately" in relation to housing numbers. Puts forward that HGA4 sub point (iii) should be removed and puts forward rewording of (vii) to "be of high architectural quality to reflect the local vernacular and seek to retain long distance views to the northern edge." Specifically in relation to HGA2, it is put forward that the HGA boundary should also include the adjacent safeguarded land. HGA2 (i) would "deliver approximately 140 new homes"; sub-point (iv) altered to "seek to retain" long distance views to the development from the south"; sub-point (vi) altered to "include additional buffers "mitigation and/or design" as necessary..."; sub-point (viii) altered to "retain healthy trees and hedgerows where possible".		To ensure Policy SS2 is justified and consistent with national policy, the following revisions to SS2 sub points 2 and 3 are recommended: "2. Address impacts and make provision or contributions towards education provision and healthcare where justified and necessary." "3 SS2 (3) states that development should enhance access to local facilities and services "where appropriate". Specifically in relation to HGA4, a larger 18 hectare site should be supported, and the following additional changes are put forward: (i) deliver approximately 340 dwellings; remove sub-point (iii); rewording of (vii) to "be of high architectural quality to reflect the local vernacular and seek to retain long distance views to the northern edge." Specifically in relation to HGA2, it is put forward that the HGA boundary should also include the adjacent safeguarded land. HGA2 (i) would "deliver approximately 140 new homes"; sub-point (iv) altered to "seek to retain" long distance views to the southern edge of the development from the south"; sub-point (vi) altered to "include additional buffers "mitigation and/or design" as necessary..."; sub-point (viii) altered to	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The Council has prioritised the development of brownfield sites and increased densities where possible. However, after assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. It is not considered appropriate or necessary to amend these sites at this stage to accommodate more housing. The development parameters and site constraints are set out in the Development Framework (2018). This documents sets out a number of requirements relating to heritage, archaeology, wildlife, ecology and other site-specific constraints. These are set out in the site-specific Policies as requirements for developers. It is not considered necessary to amend the evidence base document or any CSDP Policies in response to the developer's comments. The Council consider these sites and policies to be sound and based on robust evidence.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													"retain healthy trees and hedgerows, where possible".			
		Hellens Group	PD242	Policy	SS2	Support with mods			Hellens supports allocation of the HGA1 but consider it necessary to allocate two additional sites, SP12 (SHLAA 408) and SP13. SP12 is located in the northern most part of the site. The Council consider the site not be suitable because of noise issues on neighbouring land. Hellens have submitted a Noise Assessment which concluded that the ambient noise is primarily due to the adjacent quarry and road traffic from the A1 which could be mitigated. The Council have also approved a similar scheme subject to noise mitigations. Evidence shared with the council concluded that there are no insurmountable reasons why the site could not be developed for housing. In terms of Green belt, the site was not identified as fundamental to green belt purposes. In regards to the Bowes Railway (SAM) and wildlife corridor, this could be mitigated through design and layout and there are not technical reasons on ecology grounds why the site cannot come forward. Site SP13 (SHLAA 407a), Hellens have undertaken an Habitat and Protected species Risk Assessment in November 2014 and there are no technical reasons why the site cannot come forward. Part of the site falls within a wildlife corridor and within the setting of the Bowes Railway SAM, which could be mitigated through sensitive design. Landscape and visual impacts are considered to be low, the site can be accesses from Mount Lane.			Hellens supports allocation of the HGA1 but consider it necessary to allocate two additional sites, SP12 (SHLAA 408) and SP13. SP12 is located in the northern most part of the site. The Council consider the site not be suitable because of noise issues on neighbouring land. Hellens have submitted a Noise Assessment which concluded that the ambient noise is primarily due to the adjacent quarry and road traffic from the A1 which could be mitigated. The Council have also approved a similar scheme subject to noise mitigations. Evidence shared with the council concluded that there are no insurmountable reasons why the site could not be developed for housing. In terms of Green belt, the site was not identified as fundamental to green belt purposes. In regards to the Bowes Railway (SAM) and wildlife corridor, this could be mitigated through design and layout and there are not technical reasons on ecology grounds why the site cannot come forward. Site SP13 (SHLAA 407a), Hellens have undertaken an Habitat and Protected species Risk Assessment in November 2014 and there are no technical reasons why the site cannot come forward. Part of the site falls within a wildlife corridor and within the setting of the Bowes Railway SAM, which could be mitigated through sensitive design. Landscape and visual impacts are considered to be low, the site can be accesses from Mount Lane.		Allocated or safeguard additional land at SP12 and SP13	The proposed HGA1 avoids the more fundamental impacts affecting land immediately to the west, namely to the principles of Green Belt, associated noise issues from recycling plant, proximity to Scheduled Ancient Monument and to protected species and habitat. The site provides infilling/rounding-off of the village and with appropriate design can provide a permanent and defensible new Green Belt boundary. The Council has set out a full response in relation to both of these sites in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas, and Policy SS3 Safeguarded Land).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD241	Policy	SP3	Support with mods			Hellens support the Councils approach to Green Belt. Washington sub-area is particularly constrained by Green Belt and given the identified housing needs, Hellens support the LPAs approach to releasing Green Belt. As Springwell Village is surrounded by Green Belt, it has been a significant impediment to its future growth. Hellens have submitted a			No modification is proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		

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									Housing Needs Assessment which demonstrated that Green Belt release was needed in the village to support services and facilities. Hellens endorse that Springwell should be afforded some growth. Further growth should be provided for additional allocations in the Washington sub area and Springwell village. The allocation at Springwell is deliverable.						
Angela	Templeman	Springwell Village Residents Association	PD4966	Policy	SP3	Object		HGA1 - Concerned about the methodology used for the Green Belt Assessment. The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would harm the Bowes Railway Scheduled Ancient Monument, nor maintain wildlife and GI corridors and not limit impact on the landscape. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA2 - The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would not retain a wildlife and GI corridor and limit impact on the landscape. Policy ignores the effect of views from existing residents. Policy cannot set out what it sets out to do in terms of protecting character and environmental assets. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA3 - object on the grounds that a defensible boundary could not be formed, that development would be confined to 45 dwellings or that adequate infrastructure could be provided. Concerned about cumulative impacts of development. Safeguarded land is not afforded Green Belt protection so it is not clear how defensible Green Belt boundaries can be created in these areas. Proposals would conflict with national policy by	HGA1 - Concerned about the methodology used for the Green Belt Assessment. The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would harm the Bowes Railway Scheduled Ancient Monument, nor maintain wildlife and GI corridors and not limit impact on the landscape. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA2 - The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would not retain a wildlife and GI corridor and limit impact on the landscape. Policy ignores the effect of views from existing residents. Policy cannot set out what it sets out to do in terms of protecting character and environmental assets. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA3 - object on the grounds that a defensible boundary could not be formed, that development would be confined to 45 dwellings or that adequate infrastructure could be provided. Concerned about cumulative impacts of development. Safeguarded land is not afforded Green Belt protection so it is not clear how defensible Green Belt boundaries can be created in these areas. Proposals would conflict with national policy by creating urban sprawl and merging of settlements.		HGA1 - Concerned about the methodology used for the Green Belt Assessment. The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would harm the Bowes Railway Scheduled Ancient Monument, nor maintain wildlife and GI corridors and not limit impact on the landscape. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA2 - The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would not retain a wildlife and GI corridor and limit impact on the landscape. Policy ignores the effect of views from existing residents. Policy cannot set out what it sets out to do in terms of protecting character and environmental assets. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA3 - object on the grounds that a defensible boundary could not be formed, that development would be confined to 45 dwellings or that adequate infrastructure could be provided. Concerned about cumulative impacts of development. Safeguarded land is not afforded Green Belt protection so it is not clear how defensible Green Belt boundaries can be created in these areas. Proposals would conflict with national policy by creating urban sprawl and merging of settlements.	HGA1 - Concerned about the methodology used for the Green Belt Assessment. The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would harm the Bowes Railway Scheduled Ancient Monument, nor maintain wildlife and GI corridors and not limit impact on the landscape. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA2 - The proposals would remove a defensible Green Belt boundary rather than create one and risk the development of a lot more homes than cited in the Policy. Development would not retain a wildlife and GI corridor and limit impact on the landscape. Policy ignores the effect of views from existing residents. Policy cannot set out what it sets out to do in terms of protecting character and environmental assets. Major junction improvements would be needed to which it is unrealistic for developer to undertake. HGA3 - object on the grounds that a defensible boundary could not be formed, that development would be confined to 45 dwellings or that adequate infrastructure could be provided. Concerned about cumulative impacts of development. Safeguarded land is not afforded Green Belt protection so it is not clear how defensible Green Belt boundaries can be created in these areas. Proposals would conflict with national policy by creating urban sprawl and merging of settlements.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. In terms of HGA1: The 2018 Green Belt Boundary Assessment and Recommendations state that the proposed boundaries of HGA1 would logically round-off the southern extent of Springwell. Appropriate landscape treatment will be required along the western and southern edges to create new permanent and defensible Green Belt boundaries (see pages 24-27). HGA1 does not extend the urban area closer to the Bowes Railway SAM and the impact on the wildlife corridor and landscape can be minimised through appropriate mitigation. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. Regarding HGA2: The 2018 Green Belt Boundary Assessment and Recommendations concludes that the full submitted by Story Homes provides a more logical and defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarding by the Council in the 2018 CSDP. Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27). With regards to the wildlife corridor/gap to the east of Springwell Village, this is seen as being already compromised at Peareth Hall Road, so the corridor is viewed as incomplete. Nevertheless, a tree buffer alongside the A194(M) will be retained, enabling a north-south connection to be retained. High architectural quality will be required to protect long distance views along the site's southern edge, and sensitive design is also required throughout the development in order to minimise impact on the open landscape surrounding the village. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. With regards to HGA3: The 2018 Green Belt Boundary Assessment and Recommendations concludes that the submitted site provides a logical and defensible Green Belt boundary, and should be extended eastwards to remove the Golf Course car park. The new boundary is already strongly defined with a well-established tree belt. The release of HGA3 will create a new durable Green Belt boundary running west-east along the northern edge of Springwell and Usworth (see pages 22-24). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								creating urban sprawl and merging of settlements.						secured towards infrastructure where required. The Council has set out its full spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP3 Washington), for safeguarded land (see Policy SS3 Safeguarded Land), and for the specific HGA sites in Washington (see Policy SS2 Washington Housing Growth Areas).	
John	Tumman	Sunderland Civic Society	PD632	Policy	SS2	Object						Considers policy SS2, HGA2 not justified as the development would be contrary to policy NE6 of the plan. The allocation of site HGA2 East Springwell will join Springwell and Washington. The site also affords extensive panoramic attractive views to the south which would be lost from public view.	Delete HGA2 East of Springwell and remove it from policies map. Reinstate the land as green belt as part of policy NE6.	Overall, the Council considers that this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. The impact on settlement merging can also be seen as moderate, but this needs to be balanced against the current narrowing of this corridor immediately to the north of the site at Peareth Hall Road, which has already joined Springwell Village and Washington. There are no major adverse impacts (see pages 69-71). A tree buffer alongside the A194(M) will be retained, enabling a north-south connection to be retained. As a hilltop settlement, Springwell Village is afforded views to the south, east and north. From HGA2 the land falls away, offering extensive views southwards and eastwards. Policy HGA1 (in line with the Development Framework) requires properties to be of high architectural quality to protect long distance views along this southern edge. In line with the city's Landscape Character Assessment, sensitive design is also required throughout the development in order to minimise impact on the open landscape surrounding the village. At 60 homes (together with 60 homes at HGA1), the scale of development is considered to be appropriate over the course of the plan period- there are no other sites identified in the SHLAA-, given that Springwell Village is a village of 2,233 residents (Output Area data, mid-year 2016 estimates). The contrast in vernacular style varies considerably across the village, and the development can sympathetically support local architectural styles and materials to support the best vernacular features, and limit harm to natural landscape and longer distance views afforded from the site. Indeed, development is limited to the 'bowl' adjacent to Peareth Hall Road which limits impact to an extent, though some impact is unavoidable.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dixon	Highways England	PD4841	Policy	SS2	Object			Highways England consider the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a			Highways England consider the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network

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								position to withdraw this representation and provide full support to the Plan.			position to withdraw this representation and provide full support to the Plan.			<p>to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties.</p> <p>12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</p>
Nick	McLellan	Story Homes	PD5562	Policy	SP3	Object	Justified to release land in Green Belt as there is limited capacity within the urban area, and agrees with paragraph 4.40 which states that Washington is a highly sustainable location. Agrees that Washington is constrained by the tightest of Green Belt boundaries which suppresses development land in this area. However, consultee objects to policy (specifically HGA4) that a larger site should be included for development, totalling 18 hectares to provide 340 homes. SP3(4) is also supported regarding safeguarded land. If the land north of HGA4 is not supported, it is put forward that this land also be safeguarded. Consultee also	Justified to release land in Green Belt as there is limited capacity within the urban area, and agrees with paragraph 4.40 which states that Washington is a highly sustainable location. Agrees that Washington is constrained by the tightest of Green Belt boundaries which suppresses development land in this area. However, consultee objects to policy (specifically HGA4) that a larger site should be included for development, totalling 18 hectares to provide 340 homes.SP3(4) is also supported regarding safeguarded land. If the land north of HGA4 is not supported, it is put forward that this land also be safeguarded. Consultee also				Amend boundary of HGA4 to include full 18ha site. Include safeguarded area beside HGA2 at East Springwell to be part of HGA2 site to yield 140 homes.	The Council has set out a response in relation to both of these sites in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas, and Policy SS3 Safeguarded Land).In relation HGA4, the Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 152 and 155 that, in the Council's opinion, the impact of this additional development land has a fundamental impact on the Green Belt. Of further concern is the impact to the strategic gap between Washington and Gateshead (Follingsby), which would be reduced from its present gap of 1200m to as little as 360m (once this development and also Follingsby South were complete).In terms of biodiversity, the Council considers that the additional impacts from this scale of development could not be satisfactorily mitigated for. This fundamental impact to Green Belt purpose and significant impact to green infrastructure and biodiversity (In particular) are such that the Council does not support the larger 340 home site as either an HGA site or a safeguarded site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								objects to HGA2, and puts forward that the land for safeguarding should also form part of the allocation, enabling a 6.55 hectare site to yield 140 homes.	objects to HGA2, and puts forward that the land for safeguarding should also form part of the allocation, enabling a 6.55 hectare site to yield 140 homes.							
Caroline	Strugnell	Bellway Homes Ltd	PD1897	Policy	SP3	Object		Level of growth planned in Washington is not sufficient to accommodate potential uplift in population from strategies in Plan such as IAMP. Would like site at East House Farm to be identified as safeguarded land to ensure appropriate supply of housing land to meet economic growth. Site is partly located in South Tyneside and similar representations will be made to their plan. Green Belt Assessment is flawed as does not consider wider site (including land in South Tyneside), does not take into account proposed safeguarded land to south, IAMP or proposed housing site to west or benefits of sustainable development. Site has been discounted from SHLAA for reasons which can be addressed through good design, therefore assessment is flawed.				Level of growth planned in Washington is not sufficient to accommodate potential uplift in population from strategies in Plan such as IAMP. Would like site at East House Farm to be identified as safeguarded land to ensure appropriate supply of housing land to meet economic growth. Site is partly located in South Tyneside and similar representations will be made to their plan. Green Belt Assessment is flawed as does not consider wider site (including land in South Tyneside), does not take into account proposed safeguarded land to south, IAMP or proposed housing site to west or benefits of sustainable development. Site has been discounted from SHLAA for reasons which can be addressed through good design, therefore assessment is flawed.	Identify land at East House Farm as safeguarded land.	This land area is referred to in the Green Belt Assessment Stage 1 Updated and Stage 2 as Field parcels N1 and N12 (see pages 60-62). Both of these land parcels were identified as providing fundamental Green Belt purpose (in terms of urban sprawl and countryside encroachment) and as a result were not taken forward to Stage 2 and is not supported. In addition, it is worth noting that much of the land is affected by Flood Zone 3 (Category 1 designation). In green infrastructure and wildlife corridor terms, the site provides a key corridor junction, west-east along the River Don, and north-south joining a number of protected wildlife sites together. The site also includes protected habitat and is known to contain priority and protected species. In light of this, the site is not considered suitable as safeguarded land (see Safeguarded Land, Policy SS3).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Paul	Mackings	Paul Mackings Consulting Ltd	PD2943	Policy	SS2	Object		Object to allocation of Sites HGA1-4 of Policy SS2 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Object to allocation of Sites HGA1-4 of Policy SS2 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.			Object to allocation of Sites HGA1-4 of Policy SS2 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Take into account availability of site at Hendon Paper Mill and only make changes to Green Belt if exceptional circumstances can still be justified.	All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to be retained for employment purposes.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Mike	Van Geffen	Getten Construction Ltd	PD2600	Policy	SS2	Object		Object to HGA Green Belt deletions because there are other suitable non-Green Belt sites available to meet the city's housing needs. The consultee's site at Albany Park, Washington has been overlooked- it is 'Whiteland' and could accommodate 80 dwellings.	Object to HGA Green Belt deletions because there are other suitable non-Green Belt sites available to meet the city's housing needs. The consultee's site at Albany Park, Washington has been overlooked- it is 'Whiteland' and could accommodate 80 dwellings.			Object to HGA Green Belt deletions because there are other suitable non-Green Belt sites available to meet the city's housing needs. The consultee's site at Albany Park, Washington has been overlooked- it is 'Whiteland' and could accommodate 80 dwellings.	Object to HGA Green Belt deletions because there are other suitable non-Green Belt sites available to meet the city's housing needs. The consultee's site at Albany Park, Washington has been overlooked- it is 'Whiteland' and could accommodate 80 dwellings.	No modifications proposed.	All suitable, available and deliverable housing sites have been included within the supply and a shortfall of housing land still exists. The site referenced in the representation, Albany Park, is included within the housing supply for 46 units to be delivered within years 6-10, as set out within the SHLAA. Reference 258 - Washington Football Club, Spout Lane.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman		PD728	Policy	SS2	Object						Object to most development being in Springwell on the grounds that Springwell will be impacted the most and the impact on infrastructure would be unacceptable.	No Modification proposed.	A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.	
John	Tumman	Sunderland Civic Society	PD1036	Policy	SP3	Object						Considers policy SP3.4 Safeguarded land east of Washington not to be justified due to there being no justification given as to the basis on which this alteration is based. Future development in this area will merge Sunderland and Washington to the north of the A1231 and in conflict with Policy NE6. Nothing tangible upon which an evaluation of the need for the land can be assessed.	Delete policy SP3.4 in so far as it relates to land east of Washington and the notation from the proposals map. Reinstate the greenbelt and delete policy SS3 as no longer have any purpose.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, and considers there to be a justified case for safeguarding two areas of land (further details are in the Compliance Statement, Policy SS3). When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer term development needs. Safeguarded Land is considered necessary for a number of reasons. Firstly, it provides a degree of permanence to the Green Belt boundaries put in place by the Plan and ensures that future further reviews of the Green Belt will not be needed at the end of the Plan period. Secondly, it provides flexibility and allows for a Plan review if the council cannot demonstrate a five year land supply. During a Plan review, the reassessment of Safeguarded Land will involve determining whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as Safeguarded Land until the next review of the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carol	Dougherty		PD8198	Policy	SP3	Object						Object to Sites HGA1, HGA2, HGA3, HGA5 and HGA6 as current infrastructure, local amenities (schools, shops, GPs) and public transport links are insufficient to cope with additional demand and this will lead to congestion, poorer air quality.	Housing developments should only be allocated on brownfield sites and consideration given to the protection of historical monuments such as Peshaw Monument.	The Council has prepared a 2018 Green Belt Exceptional Circumstances Paper that explains the justification for development of HGA sites in the Green Belt. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy) and specific responses to sites HGA1-6 (see Compliance Statement Policy SS2).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1277	Policy	SP3	Object					Object to SP3 (specifically the Green Belt sites HGA1-4) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	Object to SP3 (specifically the Green Belt sites HGA1-4) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	All 4 HGA areas in the Green Belt mentioned in this Policy should be deleted	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Groves site is included within the deliverable housing supply in the SHLAA.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1069	Policy	SS2	Object					Object to SS2 (sites HGA1-4) -	Object to SS2 (sites HGA1-4) -	This policy should be deleted.	The housing requirement set out within the plan is consistent with the	The Council considers there have been no

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											exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, the impact to Springwell Village will affect the free-standing and self-defined nature of the village.	exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, the impact to Springwell Village will affect the free-standing and self-defined nature of the village.		Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Council has set out its specific responses relating to the sites HGA1 and HGA2 in Springwell Village (the free-standing and self-defined nature of the village) in Compliance Statement (see Policy SS2).	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Catherine	Greenup		PD155	Policy	SS2	Object						Objection on the grounds that proposed development in Springwell Village will exacerbate existing transport infrastructure, causing increased congestion and danger to residents and pedestrians. In addition, the development of Green Belt land is not justified and will serve to annex Springwell Village and Washington.	No Modification proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.			
Rachel	Low		PD244	Policy	SS2	Object	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. Peter Brett Associates Exceptional Circumstances Paper is contested as it does not assess the economic growth forecasts or the calculation of OAN and as this is the basis of Green Belt release it has failed to demonstrate the exceptional circumstances. The Green Space evidence base is also contested, which identifies a surplus of green space in the city area. In addition specific objections to HGA 1-6 are identified. Reasons for objection to HGA's 1-4 include; validating the growth plan based on 102 responses and not 5,000 petitioners views, it is unclear where school provision will be made as expansion land is unavailable; Green Space Audit identifies Springwell as above average quality and quantity and should be protected. Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. 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Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. 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Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. 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Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. 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Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. 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Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Objection on the grounds that exceptional circumstances have not been demonstrated for the release of Green Belt sites for housing for the following reasons: the Growth Options consultation was unsound as there was ineffective public engagement and limited response rates; the OAN is inflated based on ambitious Experian figures and ONS population projections and Sunderland's Demographic Scenarios identifying population growth of 280,000 people with the Plan providing homes for 290,000 people. It is contested that the OAN is inflated above the Governments OAN of 593 dpa and the Plan can deliver this level of housing without releasing land from the Green Belt, for which there is no strong justification. Peter Brett Associates Exceptional Circumstances Paper is contested as it does not assess the economic growth forecasts or the calculation of OAN and as this is the basis of Green Belt release it has failed to demonstrate the exceptional circumstances. The Green Space evidence base is also contested, which identifies a surplus of green space in the city area. In addition specific objections to HGA 1-6 are identified. Reasons for objection to HGA's 1-4 include; validating the growth plan based on 102 responses and not 5,000 petitioners views, it is unclear where school provision will be made as expansion land is unavailable; Green Space Audit identifies Springwell as above average quality and quantity and should be protected. Reasons for objection to HG5 include; the Green Space Audit identifies a surplus of green space in this area, however public use would prove contrary to this as it is used	Suggests removal of Green Belt land for development in the Plan.	The Council consider that there are exceptional circumstances which justify amendments to the Green Belt, as set out within the Exceptional Circumstances Paper. The Council has undertaken numerous rounds of consultation on the proposals, in excess of the minimum requirements set out within the legislation. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council has complied with all statutory obligations and followed each of these regulations. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prepared a Green Space audit and Playing Pitch Assessment for the city, which have informed the policies contained within the Plan. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								and wanted and therefore not surplus to requirements. Reasons for objection to HGA6 include; the playing pitches are a valuable community facility whose benefits to the community outweigh the economic gains, and the pitches are rated as oversubscribed in the Playing Pitch Plan 2018.	therefore not surplus to requirements. Reasons for objection to HGA6 include; the playing pitches are a valuable community facility whose benefits to the community outweigh the economic gains, and the pitches are rated as oversubscribed in the Playing Pitch Plan 2018.	and wanted and therefore not surplus to requirements. Reasons for objection to HGA6 include; the playing pitches are a valuable community facility whose benefits to the community outweigh the economic gains, and the pitches are rated as oversubscribed in the Playing Pitch Plan 2018.	therefore not surplus to requirements. Reasons for objection to HGA6 include; the playing pitches are a valuable community facility whose benefits to the community outweigh the economic gains, and the pitches are rated as oversubscribed in the Playing Pitch Plan 2018.	therefore not surplus to requirements. Reasons for objection to HGA6 include; the playing pitches are a valuable community facility whose benefits to the community outweigh the economic gains, and the pitches are rated as oversubscribed in the Playing Pitch Plan 2018.			
Alan	Hutchinson		PD2013	Policy	SP3	Object		Objects to Policy SP3-Washington has an historic under-delivery of new homes, yet allocations within the New Town will only deliver around 600 homes, and therefore additional housing land is required to improve flexibility. Land at Glebe House Farm could provide 55 homes and should be included as an HGA site.	Objects to Policy SP3-Washington has an historic under-delivery of new homes, yet allocations within the New Town will only deliver around 600 homes, and therefore additional housing land is required to improve flexibility. Land at Glebe House Farm could provide 55 homes and should be included as an HGA site.		Objects to Policy SP3-Washington has an historic under-delivery of new homes, yet allocations within the New Town will only deliver around 600 homes, and therefore additional housing land is required to improve flexibility. Land at Glebe House Farm could provide 55 homes and should be included as an HGA site.	Objects to Policy SP3-Washington has an historic under-delivery of new homes, yet allocations within the New Town will only deliver around 600 homes, and therefore additional housing land is required to improve flexibility. Land at Glebe House Farm could provide 55 homes and should be included as an HGA site.	Reinstatement of land at Glebe House Farm as a housing growth area to deliver approximately 55 new homes, this could include the delivery of self-build/custom-build homes.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP3 Washington), and set out a specific response to the site (see Policy SS3 Safeguarded Land). The Council acknowledges that the level of housing growth proposed in Washington is lower than for other parts of the city, due in large part to a lack of available sites within the urban area as well as the Green Belt designation that surrounds much of the New Town. Nevertheless, the Council no longer supports the Glebe House site- the reasons are given in the 2018 Green Belt Assessment Addendum (p3-4). This states that the potential amenity impacts from adjacent businesses on Pattinson Industrial Estate were deemed to be fundamental to the site's suitability for residential development and would affect business viability. In particular, the viability of existing businesses may be compromised if complaints are received in the future relating to operational noise, dust and traffic, resulting from residential property being located on this site. One business in question made representations to the Draft Plan which indicated that they were planning to expand their operations (including 24 hour operation), and were concerned that this future expansion would not be feasible with residential development in such close proximity. This business already has more than 100 vehicle movements per day (many HGV's) and deals with wood recycling which is controlled under a waste management licence. Pattinson South Industrial Estate, which is adjacent to the site, is a Primary Employment Area, and together with the impacts identified through consultation, it was concluded that the site should no longer be supported or be considered suitable as safeguarded land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Roland	Buckingham		PD650	Policy	SS2	Object		Objects to Policy SS2 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; no spare capacity available at local primary schools; greenspace in Springwell Village and Fatfield should be protected from development; the Southern Area Playing Fields are well used by 17 different sports teams and are among the most used.	Objects to Policy SS2 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; no spare capacity available at local primary schools; greenspace in Springwell Village and Fatfield should be protected from development; the Southern Area Playing Fields are well used by 17 different sports teams and are among the most used.	Objects to Policy SS2 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; no spare capacity available at local primary schools; greenspace in Springwell Village and Fatfield should be protected from development; the Southern Area Playing Fields are well used by 17 different sports teams and are among the most used.	Objects to Policy SS2 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; no spare capacity available at local primary schools; greenspace in Springwell Village and Fatfield should be protected from development; the Southern Area Playing Fields are well used by 17 different sports teams and are among the most used.	Objects to Policy SS2 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; no spare capacity available at local primary schools; greenspace in Springwell Village and Fatfield should be protected from development; the Southern Area Playing Fields are well used by 17 different sports teams and are among the most used.	No modifications proposed.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification for these Policies and sites can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.</p>	
John	Tumman	Sunderland Civic Society	PD1815	Policy	SS2	Object				Pd155		Objects to Policy SS2 on the grounds that the housing	Delete Sites HGA1-6 from the plan and reinstate the Green	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively	The Council considers there have been no soundness or legal

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												<p>requirement is overambitious and unachievable. There is therefore no requirement for the Housing Growth Areas.</p>	Belt.	<p>Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>Further justification can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.</p>	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Boyle		PD792	Policy	SS2	Object						<p>Objects to Policy SS2 on the grounds that the sports fields are well used and provide a valuable amenity to the local area, with no alternative facility available and the Washington already lacking key facilities such as parkland or play areas.</p>	No modifications proposed.	<p>The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use</p>	<p><u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field</u></p>

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														at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). An additional modification is proposed to Policy SS2: HGA6 to clarify the Council's position (M22).	policy exception E4.
Merry	Hall		PD321	Policy	SS2	Object		Considers that policy SS2, with particular reference to HGA6 is not positively prepared. Additional homes will compound traffic issues and no mention of new road infrastructure, school, health care or public transport. Additional traffic generated by more homes unacceptable and create more pollution and danger to pedestrians. Loss of green space will be catastrophic to residents and the wildlife.					Traffic management system, speed cameras, deterring cars from using Bonemill Lane as a short cut. No mention of school, health care or public transport.	A Transport Statement has been prepared by the City Council and this demonstrates that the proposed development integrates into the existing transport network with a number of sustainable methods of transport available to access the site. The level of parking has been designed to meet the anticipated demand. However, the impact of traffic growth on the surrounding road network of the proposed development may adversely affect congestion rates and traffic safety. Therefore it is concluded that there is to be a transport assessment produced to fully determine the wider impact of the extra dwellings on the existing highway infrastructure. An Ecological Assessment has been prepared for the proposed site. Development will address direct and indirect impacts and include retention of all natural and semi-natural habitats with appropriate buffers to allow for connectivity. Recreational provision will ensure the ecological viability of habitats retained on site as well as sensitive features identified off site. Generals Wood LWS lies 20m from the site boundary and the proposed development is likely to result in an increase in visitor pressure, particularly dog walkers, and therefore mitigation and compensatory measures should be provided under Section 106 of The Town and Country Planning Act 1990, as amended. If unable to mitigate sufficiently, creation of new areas of biodiversity-rich habitat will be required, equivalent to or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. An additional modification is proposed to Policy SS2: HGA6 to clarify the Council's position (M22).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
Scott	Metcalf		PD1004	Policy	SS2	Object		Objects to Policy, stating that there are numerous brownfield sites available and suitable for development.	Objects to Policy, stating that there are numerous brownfield sites available and suitable for development.				No modifications proposed.	All available brownfield sites have been taken account and included within the housing supply, as set out in the SHLAA.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Hilary	Metcalf		PD981	Policy	SS2	Object		Objects to Policy, stating that there are	Objects to Policy, stating that there are				No modifications proposed.	All available brownfield sites have been taken account and included	The Council considers there have been no

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							numerous brownfield sites available and suitable for development.	numerous brownfield sites available and suitable for development.		numerous brownfield sites available and suitable for development.			within the housing supply, as set out in the SHLAA.	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Tatters		PD620	Policy	SP3	Object		Objects to the Plan on the grounds that the industrial expansion of Washington has resulted in adverse impacts upon the quality of life of local residents. Infrastructure is all geared towards businesses, with noise, traffic and pollution close to housing.				Plan should consider the effects of industrial development on residents in terms of noise, pollution and traffic.	The plan does not propose any new employment allocations within Washington. Any development proposals will be expected to accord with Policy HS1 which seeks to ensure that any impacts of development are acceptable.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jeane	Jack		PD383	Policy	SS2	Object					Policy not justified. Playing fields are important to enjoy sport in the fresh air as obesity becomes a problem in the UK and should be kept as a priority. Indoor facilities are not an equivalent option.	No Modification proposed.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
John	Tumman	Sunderland Civic Society	PD1161	Policy	SP3	Object					Considers policy SP3.4 Safeguarded land south of Springwell not to be justified. Housing target is over ambitious and not should be reduced therefore not require the site. The society have objected to the removal of the HGA site that adjoins this safeguarded land and as such no point in safeguarding this strip of land without the larger HGA. Removal from Green Belt at this stage undermines the purpose of the green belt and loss of long distance views and undermining the separateness of Springwell Village.	Delete Policy SP3.4 insofar as it relates to land south of Springwell and notation from proposals map. Reinstate land as green belt. Delete policy SS3 as no longer have any purpose.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018). The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. It is considered that the scale of development supported in this Plan will enable the village to retain its separateness- the gap eastwards to Washington (though already compromised to an extent at Peareth Hall Road) will retain a tree belt alongside the edge of the A194(M). The 2018 Green Belt Boundary Assessment and Recommendations concludes that	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														the full submitted by the developer provides a more logical and defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarding by the Council in the 2018 CSDP. Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27).	
John	Tumman	Sunderland Civic Society	PD767	Policy	SP3	Object						Policy SP3.3 not justified as these sites are not needed for development to provide a realistic number of new dwellings. Level of housing development is over ambitious and unachievable. Deleting HGA's in Washington will help meet the preferred target, retain greenbelt and minimise urban sprawl.	Delete policy SP3.3 and the associated HGA's. Reinstate the green belt in these areas. Policy SS2 would be superfluous and should be deleted.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. A full response regarding all Washington HGA sites is within the Compliance Statement (see Policy SS2).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Bradley	Sunderland Green Party	PD4534	Policy	SS2	Object					Specific objections relating to HGA1-6:HGA1-4:The Plan should consider the volume of objections from Springwell area. Neither Springwell nor Usworth schools have capacity to expand and there is no scope for a new school. Greenspace levels should be celebrated and protected, not used as an excuse for reducing the Green Belt. HGA5- loss of greenspace that is not justified. HGA6-loss of sports fields used by 17 teams in 2017. Playing Pitch Plan 2018 identifies that pitches are over-subscribed.	Specific objections relating to HGA1-6:HGA1-4:The Plan should consider the volume of objections from Springwell area. Neither Springwell nor Usworth schools have capacity to expand and there is no scope for a new school. Greenspace levels should be celebrated and protected, not used as an excuse for reducing the Green Belt. HGA5- loss of greenspace that is not justified. HGA6-loss of sports fields used by 17 teams in 2017. Playing Pitch Plan 2018 identifies that pitches are over-subscribed.	No modifications proposed.	The Council has prepared a 2018 Green Belt Exceptional Circumstances Paper that explains the justification for development of HGA sites in the Green Belt. The consultee has raised objections relating to a number of different sites, and the Council has set out responses to these in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dave	McGuire	Sport England	PD4475	Policy	SP3	Object			Sport England objects to the allocation of site HGA6 on the grounds that an up to date Playing Pitch Strategy identifies the site is surplus to requirement and an equivalent playing field of quantity and quality is identified. The Council has not approached Sport England to identify suitable replacement sites for the allocation. It is acknowledged that the successful implementation of the Parklife project might solve some playing fields becoming surplus to requirement but it is premature to speculate which playing fields at this time. The Council is making an assumption that the team wish to move across to the Parklife site in Washington.			Remove the allocated site HGA6 from the Plan	SCC and the SE have been working together on the Parklife Programme. In identifying the city's needs for 'Hub' facilities an FA modelling exercise was undertaken to map current and future participation requirements in the city against existing and potential new facilities, a football/ pitch blueprint was produced. This blueprint identified the 'appropriate' number of core football 'Hubs' at which the city's football demands can be met. To inform the Parklife Programme bid, the city's current Playing Pitch Plan (PPP) has recently been updated and developed to include an overarching, needs driven, strategic plan for the city. The PPP provides an overview of demand and supply issues associated with pitch requirements in the following sports - football, cricket, rugby union, rugby league, hockey, tennis and bowls. The PPP indicates that following the development of the Parklife Hub sites it is highly likely that some football sites will become surplus to requirements and subject to various consents (Planning, SE etc) could be disposed of, thereby releasing capital receipts for the Council and covering the cost of the initial capital investment. The PPP will be need to be updated, in consultation with SE, two years after the first Hub site in the city opens in order to identify any sites	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>	

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														which have become surplus to requirement as a result of the opening of the sports Hubs. If and when the PPS identifies the sites surplus then the sites then they can be brought forward for development. The Council proposes a modification to clarify the position (M22).	
		NHS Sunderland CCG	PD68	Policy	SS2	Support						Support criterion 2 and the explicit reference to contributions to healthcare amongst others.	Representation to be read in conjunction with others submitted by the respondent.	The Council acknowledges the support from NHS Sunderland CCG. A Statement of Common Ground has been signed between NHS Sunderland CCG and the Council (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
M&G Real Estates			PD3603	Policy	SP3	Object		Support economic and housing growth proposed in Washington area. The Plan should be revised to ensure that until the A&D Plan is brought forward, development which may affect the deliverability of sites should be resisted. Concerned that development in advance of the A&D Plan could put future investment at risk.	Support economic and housing growth proposed in Washington area. The Plan should be revised to ensure that until the A&D Plan is brought forward, development which may affect the deliverability of sites should be resisted. Concerned that development in advance of the A&D Plan could put future investment at risk.		Support economic and housing growth proposed in Washington area. The Plan should be revised to ensure that until the A&D Plan is brought forward, development which may affect the deliverability of sites should be resisted. Concerned that development in advance of the A&D Plan could put future investment at risk.	Support economic and housing growth proposed in Washington area. The Plan should be revised to ensure that until the A&D Plan is brought forward, development which may affect the deliverability of sites should be resisted. Concerned that development in advance of the A&D Plan could put future investment at risk.	Consideration needs to be given to how town centre potential can be preserved and protected in the interim. It is suggested that this might be best achieved by a phasing Policy which sets out for each geographical area the floorspace that is required within particular five year periods.	The Council considers that sufficient protection for Washington Town Centre is set out through the CSDP. It is set out in Policy SP3 that Washington Town Centre will be the focus for office, retail and main town centre uses. This is further reinforced elsewhere in the CSDP. Policy VC1: Main Town Centre Uses and Retail Hierarchy, sets out the principle of supporting the vitality and viability of town centres (including Washington Town Centre) as well as the hierarchy of retail centres. This also sets out the principle of the sequential test, one of the key mechanisms in promoting the function of town centre. Additionally, Policy VC2: Retail Impact Assessment sets out the principle of the impact assessment. This sets a threshold of; 1,250 square metres for convenience retail development and 1,500 square metres for comparison development for edge or out of centre proposals on Washington Town Centre. Policy VC3: Primary shopping areas and frontages sets out primary shopping area, primary frontages and secondary frontages for town centres, and what uses will be permitted in each thoroughfare.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD1609	Policy	SP3	Support		Supportive of Policy SP3. Site HGA3 is available, suitable and achievable and is therefore in accordance with the NPPF able to come forward in the short term. The site is located in a residential area and could accommodate approximately 60 dwellings. BDW control the site and therefore it is available for development now. The site is sustainable and the Green Belt boundary change would provide a more logical, robust and defensible Green Belt boundary for the future. Technical Assessments have been prepared including a Transport Statement, ecological assessment and heritage assessment which show the site is suitable for residential development. The site is fully capable of being delivered in the next 5 years.	Supportive of Policy SP3. Site HGA3 is available, suitable and achievable and is therefore in accordance with the NPPF able to come forward in the short term. The site is located in a residential area and could accommodate approximately 60 dwellings. BDW control the site and therefore it is available for development now. The site is sustainable and the Green Belt boundary change would provide a more logical, robust and defensible Green Belt boundary for the future. Technical Assessments have been prepared including a Transport Statement, ecological assessment and heritage assessment which show the site is suitable for residential development. The site is fully capable of being delivered in the next 5 years.		Supportive of Policy SP3. Site HGA3 is available, suitable and achievable and is therefore in accordance with the NPPF able to come forward in the short term. The site is located in a residential area and could accommodate approximately 60 dwellings. BDW control the site and therefore it is available for development now. The site is sustainable and the Green Belt boundary change would provide a more logical, robust and defensible Green Belt boundary for the future. Technical Assessments have been prepared including a Transport Statement, ecological assessment and heritage assessment which show the site is suitable for residential development. The site is fully capable of being delivered in the next 5 years.	Supportive of Policy SP3. Site HGA3 is available, suitable and achievable and is therefore in accordance with the NPPF able to come forward in the short term. The site is located in a residential area and could accommodate approximately 60 dwellings. BDW control the site and therefore it is available for development now. The site is sustainable and the Green Belt boundary change would provide a more logical, robust and defensible Green Belt boundary for the future. Technical Assessments have been prepared including a Transport Statement, ecological assessment and heritage assessment which show the site is suitable for residential development. The site is fully capable of being delivered in the next 5 years.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Central Gospel Hall Trust	PD146	Policy	SP3	Support						Support Policy SP3. The growth and regeneration strategy reflects the highly sustainable location of Washington. The policy recognises the historic rigid constraints on the	No Modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												growth of Washington and Springwell Village. The proposed Green Belt boundary changes are consistent with national policy and supported by a thorough Green Belt boundary review. The approach to allow a small level of new development at Springwell Village to support local services is supported.			
Ryan	Molloy	Thompsons of Prudhoe	PD192	Policy	SP3	Object			Thompsons of Prudhoe consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The Springwell Quarry site is currently in the Green belt as a sandstone quarry with restoration by backfilling waste. There is currently a planning application, as the existing expires in 2022. The location of the site in the Green Belt would potentially limit the future development of the site by limiting the number of structures and development that can occur.		Thompsons of Prudhoe consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The Springwell Quarry site is currently in the Green belt as a sandstone quarry with restoration by backfilling waste. There is currently a planning application, as the existing expires in 2022. The location of the site in the Green Belt would potentially limit the future development of the site by limiting the number of structures and development that can occur.	The presence of Springwell Quarry, on the edge of Springwell, needs to be acknowledged. Green Belt designation for housing is being put forward in this policy however there is no acknowledgement of Springwell Quarry and the role it plays.	The Council states that the Green Belt Boundary review identifies minor boundary amendments throughout the report that are non-housing related. Furthermore, the site does not constitute inappropriate development in the Green Belt, and has operated within the Green Belt for decades already. Additionally, the Green Belt Assessment Stage 1 Updated and Stage 2 states that removal of the site from Green Belt would have moderate overall adverse impact on Green Belt purpose (pages 68-69) and would also incur a major Green Belt boundary change that would significantly reduce the Green Belt gap between Springwell Village and Eighton Banks (Gateshead). The Green Belt Boundary Assessment concluded that the new boundary proposed by site HGA1 was most appropriate, stating that: the proposed western boundary initially appears to be somewhat arbitrary, running through the centre of the field north to south, with no physical evidence on the ground suggesting an existing permanent boundary in that location. Including land to the west of the proposed western boundary of HGA1 would, however, result in various harmful effects, including the coalescence of Springwell with Eighton Banks and encroachment into a local green corridor. We therefore agree that the proposed boundary is appropriate, (see paragraph 4.56, page 25). As no exceptional circumstances have been made to justify removal of the site from Green Belt, the boundary has not been amended.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Regeneration & Property		Sunderland City Council	PD3376	Policy	SP3	Support						Washington is a strong area for growth, but opportunities for housing development have been limited since the mid-1990's due to the New Town Masterplan effectively being realised, and the New Town being surrounded by Green Belt. Since the 1998 UDP, focus for residential development has been in Coalfield area and it is questioned whether this area can continue to be the focus for such a sustained level of growth. The Council considers that the focus now needs to be more balanced, with a focus for development returning to Washington. Without growth in Washington, it is considered that the plan would not meet the sustainable development requirements of the	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Barbara	Hooper	Historic England	PD94	Policy	SS2	Support with mods						NPPF. Historic England welcomes 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 Waggonways 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.	Incorporate a reference to the potential need for archaeological investigation	The Council has agreed a Statement of Common Ground with Historic England (SD.8k). While meeting to discuss these issues, it was agreed that the modification proposed in comment PD94 is not necessary and the Policy as existing is sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD169	Policy	SS2	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD170	Policy	SS2	Object					This policy is considered to be unsound as	This policy is considered to be unsound as	No proposed modification	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt	The Council considers there have been no soundness or legal

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											exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.		boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Christine	Brown		PD254	Policy	SS2	Object		Object on the grounds that the Plan has been prepared with inadequate knowledge of Springwell Village. Concerns about impact of development on traffic and heritage. If new houses are needed, they should reflect local need such as low cost starter homes and accessible homes.	Object on the grounds that the Plan has been prepared with inadequate knowledge of Springwell Village. Concerns about impact of development on traffic and heritage. If new houses are needed, they should reflect local need such as low cost starter homes and accessible homes		Object on the grounds that the Plan has been prepared with inadequate knowledge of Springwell Village. Concerns about impact of development on traffic and heritage. If new houses are needed, they should reflect local need such as low cost starter homes and accessible homes	Sites HGA1 and HGA2 should be removed from the Plan. The Council should prioritise development on brownfield sites in Washington.	The plan period is consistent with the NPPF which requires plans for be drawn up over an appropriate time period, preferably 15 years. The policies of the plan will be regularly monitored and the plan reviewed where necessary. The plan will be reviewed at least every 5 years in accordance with the NPPF. Numerous rounds of consultation have been undertaken by the Council which have exceeded the minimum requirements set out within legislation and the adopted Statement of Community Involvement. A number of separate queries have been raised regarding different HGA sites in Washington, and these have been addressed in the spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP3 Washington), and for the specific HGA sites in Washington (see Policy SS2 Washington Housing Growth Areas). These reports (together with the accompanying Development Frameworks) confirm that 15% affordable housing will be delivered within these HGA sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Elizabeth	Martin		PD416	Policy	SS2	Object		Objects to Policy SP3 on the grounds that the evidence to support deletion from the Green Belt for Site HGA1 was not fully and fairly assessed. Site 407c was treated differently to sites 407a and 407b in the SHLAA. The same factors why sites			Objects to Policy SP3 on the grounds that the evidence to support deletion from the Green Belt for Site HGA1 was not fully and fairly assessed. Site 407c was treated differently to sites 407a and 407b in the SHLAA. The same factors why sites	SHLAA Site 407c (HGA1) should be scored in the same way as Sites 407a and 407b in the Green Belt Assessment and retained in the Green Belt.	The Council has set out a response in relation to these sites in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas, and Policy SS3 Safeguarded Land).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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								407a and 407b in the SHLAA. The same factors why sites 407a and 407b were retained in the Green Belt would apply to site 407c, such as closeness to Bowes Railway, school capacity, noise impact from quarry.				407a and 407b were retained in the Green Belt would apply to site 407c, such as closeness to Bowes Railway, school capacity, noise impact from quarry.			
John	Cooper		PD278	Policy	SS2	Object			Objects to Site HGA1 of Policy SS2 on the grounds that it is not effective as it would merge Springwell Village with neighbouring settlements in Gateshead, would increase impact on traffic and streets cannot be changed to provide increased capacity, a wildlife corridor runs through the site and it would harm the Bowes Railway Scheduled Ancient Monument. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local school, health services and road network.		Objects to Site HGA1 of Policy SS2 on the grounds that it is not consistent with National Policy as it would merge Springwell Village with neighbouring settlements in Gateshead, would increase impact on traffic and streets cannot be changed to provide increased capacity, a wildlife corridor runs through the site and it would harm the Bowes Railway Scheduled Ancient Monument. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local school, health services and road network.	Objects to Site HGA1 of Policy SS2 on the grounds that it is not justified as it would merge Springwell Village with neighbouring settlements in Gateshead, would increase impact on traffic and streets cannot be changed to provide increased capacity, a wildlife corridor runs through the site and it would harm the Bowes Railway Scheduled Ancient Monument. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local school, health services and road network.	Do not delete Site HGA1 from the Green Belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA1 from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of this site does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable. A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Policy and Development Framework stipulate that the development of the site must ensure that the open aspect to Bowes Railway Scheduled Ancient Monument is retained; maintain wildlife and green infrastructure corridors and limit any impact on the areas landscape character by providing a greenspace buffer along the western edge of the site. The Council considers the Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Cooper		PD279	Policy	SS2	Object			Objects to Site HGA2 of Policy SS2 on the grounds that it is not effective as removing the site from the Green belt will merge Springwell Village and Washington, would increase impact on traffic and streets cannot be changed to provide increased capacity and a wildlife corridor runs through the site. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local		Objects to Site HGA2 of Policy SS2 on the grounds that it is not compliant with National Policy as removing the site from the Green belt will merge Springwell Village and Washington, would increase impact on traffic and streets cannot be changed to provide increased capacity and a wildlife corridor runs through the site. Concerned about disproportionate level of development proposed for Springwell Village and cumulative	Objects to Site HGA2 of Policy SS2 on the grounds that it is not justified as removing the site from the Green belt will merge Springwell Village and Washington, would increase impact on traffic and streets cannot be changed to provide increased capacity and a wildlife corridor runs through the site. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local	Do not delete site HGA2 from the Green Belt.	Overall, the Council considers that this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. The impact on settlement merging can also be seen as moderate, but this needs to be balanced against the current narrowing of this corridor immediately to the north of the site at Peareth Hall Road, which has already joined Springwell Village and Washington. There are no major adverse impacts (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 69-71). A tree buffer alongside the A194(M) will be retained, enabling a north-south connection to be retained. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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									school, health services and road network.		impact on local school, health services and road network.	school, health services and road network.		will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA2, Policy SS2).	
Chris	Green		PD316	Policy	SS2	Object					Objects to Sites HGA2 and HGA3 of Policy SS2 on the grounds that they are not compliant with Paragraph 80 of the NPPF as the development does not demonstrate the least harm to the Green Belt.	Objects to Sites HGA2 and HGA3 of Policy SS2 on the grounds that the development does not demonstrate the least harm to the Green Belt and that it would adversely impact upon the character and rural setting of Springwell Village by merging it with Washington.	Sites HGA2 and HGA3 should be retained as Green Belt indefinitely.	Overall, the Council considers that this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. The impact on settlement merging can also be seen as moderate, but this needs to be balanced against the current narrowing of this corridor immediately to the north of the site at Peareth Hall Road, which has already joined Springwell Village and Washington. There are no major adverse impacts (see pages 69-71). A tree buffer alongside the A194(M) will be retained, enabling a north-south connection to be retained.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD171	Policy	SS2	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt Chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt Chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD172	Policy	SS2	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to	No proposed modification	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.	accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break.		Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	
John	Cooper		PD280	Policy	SS2	Object			Objects to Site HGA3 of Policy SS2 on the grounds that it is not effective as removing the site from the Green belt will merge Springwell Village and Washington, would increase impact on traffic and streets cannot be changed to provide increased capacity and a wildlife corridor runs through the site. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local school, health services and road network.		Objects to Site HGA3 of Policy SS2 on the grounds that it is not justified as removing the site from the Green belt will merge Springwell Village and Washington, would increase impact on traffic and streets cannot be changed to provide increased capacity and a wildlife corridor runs through the site. Concerned about disproportionate level of development proposed for Springwell Village and cumulative impact on local school, health services and road network.	Do not delete site HGA3 from the Green Belt.	Overall, the Council considers that this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. The impact on settlement merging can also be seen as moderate, but this needs to be balanced against the current narrowing of this corridor immediately to the north of the site at Peareth Hall Road, which has already joined Springwell Village and Washington. There are no major adverse impacts (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 69-71). A tree buffer alongside the A194(M) will be retained, enabling a north-south connection to be retained. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA3, Policy SS2).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Amy F	Ward	Barratt David Wilson Homes	PD1611	Policy	SS2	Object		Supportive of Policy SS2 in principle however the prescriptive approach should not undermine the viability of schemes. Flexibility should therefore be incorporated into the policy. It is unclear what the 'enhance access to local facilities and services' requirement relates to. Concerned about the interaction between Policy SS2 and H1 regarding housing mix. Not clear how evidence for housing mix has been derived and a flexible approach	Supportive of Policy SS2 in principle however the prescriptive approach should not undermine the viability of schemes. Flexibility should therefore be incorporated into the policy. It is unclear what the 'enhance access to local facilities and services' requirement relates to. Concerned about the interaction between Policy SS2 and H1 regarding housing mix. Not clear how evidence for housing mix has been derived and a flexible approach		Supportive of Policy SS2 in principle however the prescriptive approach should not undermine the viability of schemes. Flexibility should therefore be incorporated into the policy. It is unclear what the 'enhance access to local facilities and services' requirement relates to. Concerned about the interaction between Policy SS2 and H1 regarding housing mix. Not clear how evidence for housing mix has been derived and a flexible approach	Supportive of Policy SS2 in principle however the prescriptive approach should not undermine the viability of schemes. Flexibility should therefore be incorporated into the policy. It is unclear what the 'enhance access to local facilities and services' requirement relates to. Concerned about the interaction between Policy SS2 and H1 regarding housing mix. Not clear how evidence for housing mix has been derived and a flexible approach	Remove bullet points 1-3 from Policy SS2. Incorporate suggested changes to stems ii) to vii) of Site HGA3 or delete all criteria from stems ii) to vii).	The site specific policies have been developed to ensure the right types of homes are delivered in these greenfield, peripheral locations which will contribute towards meeting the overall housing needs of the city, making best use of the available sites and locations and protecting the existing environment and in some cases sensitive locations. The Council considers that the level of detail is appropriate and the approach is sound, enabling in particular that a number of sensitive site issues are identified and addressed, and specifically addressed at the planning application stage. The Policy is supported and justified by the Development Frameworks (2018) which provide details on the constraints together with recommendations for development principles and parameters to guide development of these sites. The	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								should be adopted as need and demand will vary from area to area and site to site. The bullets for the sites are not necessary as they are covered by other policies in the plan or national policies. Concerned with some of the vague criteria for Site HGA3 and the evidence base and justification for the criteria. It is considered that Site HGA3 already has a strong a durable Green Belt boundary and no need to create a new one, no evidence or justification has been provided of the wildlife and green infrastructure corridor, a noise assessment has been undertaken which shows that noise is not a significant issue, no evidence or justification has been presented to retain healthy trees and hedgerows, no evidence or justification for where open space should be located, concerned that stem vij) would overlap with Policy H1.	should be adopted as need and demand will vary from area to area and site to site. The bullets for the sites are not necessary as they are covered by other policies in the plan or national policies. Concerned with some of the vague criteria for Site HGA3 and the evidence base and justification for the criteria. It is considered that Site HGA3 already has a strong a durable Green Belt boundary and no need to create a new one, no evidence or justification has been provided of the wildlife and green infrastructure corridor, a noise assessment has been undertaken which shows that noise is not a significant issue, no evidence or justification has been presented to retain healthy trees and hedgerows, no evidence or justification for where open space should be located, concerned that stem vij) would overlap with Policy H1.		should be adopted as need and demand will vary from area to area and site to site. The bullets for the sites are not necessary as they are covered by other policies in the plan or national policies. Concerned with some of the vague criteria for Site HGA3 and the evidence base and justification for the criteria. It is considered that Site HGA3 already has a strong a durable Green Belt boundary and no need to create a new one, no evidence or justification has been provided of the wildlife and green infrastructure corridor, a noise assessment has been undertaken which shows that noise is not a significant issue, no evidence or justification has been presented to retain healthy trees and hedgerows, no evidence or justification for where open space should be located, concerned that stem vij) would overlap with Policy H1.	should be adopted as need and demand will vary from area to area and site to site. The bullets for the sites are not necessary as they are covered by other policies in the plan or national policies. Concerned with some of the vague criteria for Site HGA3 and the evidence base and justification for the criteria. It is considered that Site HGA3 already has a strong a durable Green Belt boundary and no need to create a new one, no evidence or justification has been provided of the wildlife and green infrastructure corridor, a noise assessment has been undertaken which shows that noise is not a significant issue, no evidence or justification has been presented to retain healthy trees and hedgerows, no evidence or justification for where open space should be located, concerned that stem vij) would overlap with Policy H1.		housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	
Nick	Horsley	Mineral Products Association	PD4350	Figure	20	Support with mods						The same map is used for Site HGA4 and Site HGA5.HGA5 is incorrect.	Amend plan do use correct maps.	The Council propose an additional modification to reflect this comment. (M21)	Figure 20 has been replaced.
Ian	Davies		PD15	Policy	SS2	Object			The plan is not effective as it does not take into consideration any current neighbouring county's developments. As such there has not been sufficient joint working. Any further development to this area would be detrimental to local amenities, schools and health resources.				The policy needs to highlight that consideration has been given to cross boundary issues in making a decision and stipulate its findings and relate the findings to the other factors considered within the plan and substantiate its conclusion.	The Council has prepared a Duty to Cooperate Statement which demonstrates how the Council has taken into consideration cross boundary issues.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1391	Policy	SS2	Support				Durham County Council previously made representations regarding the proximity of allocations HGA5 and HGA6 to the Lambton Castle Park and Garden of Special Historic Interest and Garden of Local Interest. Welcome changes to the Policy to by providing green space buffer for HGA6 and retaining the majority of tree belts for HGA5.			No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Duncan		PD224	Policy	SS2	Object		Objection to the Playing Pitch Plan, as it is out of date and demonstrates that HGA 6 is surplus to requirements, when it is the location of several football pitches. Object to a new Playing Pitch Plan being prepared in 2021 as a means of justification as this will not be compliant with national policy.	Object to the effectiveness of the proposals when Sunderland has the largest figures in the region for obesity, inactivity and poor quality of mental health, with the use of green spaces (playing fields)as being a good way to reduce these and provide a long terms cost effective method for health.		Objection on the grounds that the proposal is not consistent with national planning policy (para 73 & 74) regarding development of playing fields. It fails to cover or show any of the five exceptions that Sport England would consider appropriate, including loss and replacement with equal quality.	Object on the grounds that loss of this site cannot be justified, particularly in light of its use as a sports facility and Washington United's wish to invest in it as a sporting facility for the whole community.	Remove HGA6 from the plan in full or, the council to identify a piece of land to the same equivalent, in accordance with Sport England guidance and exceptions.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019.If at that stage, the revised	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>

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													Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	
WD & CT	Dunn		PD258	Policy	SS2	Object	This site of several football playing pitches is crucial to the health of residents and children in the area. It is used to a great degree. The council have submitted an out of date playing pitch plan to Sport England in order to justify that this site is surplus to requirements as a sports facility. Sport England has rejected this and in 2021 a new plan is to be prepared but this will not be compliant with national policy as set out below.	Not effective as removing this site will be detrimental to health of residents who use this area. Exercise and green spaces have proved vital to physical and mental health.		Not consistent with national policy. The fields lost will not be replaced with equal quality. Playing fields should be protected as per paragraphs 73 and 74 of NPPF.	Using this site for housing will never be justified as it is so widely used for sport. There are brownfield sites in the local authority which should be used first as per the NPPF. A local football club wish to invest in the site and improve it.	Remove Site HGA6 from the Plan. Brownfield sites should be developed first.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.
Carl	Hedley		PD248	Policy	SS2	Object	Objection as the site is the location of several football pitches and an out-of-date Playing Pitch Plan identifies that the site is surplus to requirements as a sports facility, which is contested.	Objection of the loss of the site on the grounds that playing fields/green spaces are all good ways to reduce obesity, inactivity, improve mental health and reduce long term health costs.		Objection on the grounds that the plan is not consistent with NPPF paragraphs 73 & 74 or Sport England's guidance in regard to replacing the loss of fields with equal quality.	Objection on the grounds that it will result in the loss of facilities used by the whole community, particularly in light of Washington United wishing to invest in it as a sporting facility.	Suggests removing the site from the plan or supplying a piece of land locally to the same equivalent in accordance with Sport England's guidance and exceptions.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport	Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.

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														Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	
Alan	Grieves		PD76	Policy	SS2	Object		Objection based on the grounds that the site is currently the location of several football pitches. In addition, the council's evidence base (Playing Pitch Plan) is out of date and identifies the site is surplus to requirements when this is not the case.	Objection on the grounds that the site provides a recreation space which helps combat obesity, inactivity, poor quality mental health and longer term costs towards health.		Objection on the grounds that the Plan is not consistent with NPPF paragraphs 73 & 74 and Sport England guidance which requires any loss to be replaced with equal quality provision.	Objection on the grounds that losing the site to housing will result in a shortage of available sporting facilities for the whole community.	Suggests removing the site from the Plan or supplying a piece of land to the same equivalent in accordance with Sport England guidance and exceptions.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>
Karl	Burns		PD11	Policy	SS2	Object					Objects to the policy on the grounds that the proposals would lead to a loss of open space. Questions who will be able to afford the housing as we are now a low wage economy. Concerns over investment in the local economy.		Would like to see development on brownfield sites and more affordable housing.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>

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														infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	
John	Tumman	Sunderland Civic Society	PD1045	Policy	SS2	Object						Considers policy SS2, HGA5 not justified as the allocation would compromise the integrity of the greenbelt in this locality. Opening the door to potentially additional housing development south of the river and north west of the HGA. Proposed site incorporates a riverside area which provides valuable amenity for local community and wider city. Housing on the western part of the site would be subject to high levels of noise and pollution from A182. Involve loss of land from Sir James Steel park whose purpose is to encourage informal countryside recreation.	Delete HGA5 and delete it from proposals map. Reinstate the greenbelt as part of policy NE6.	Overall, there are no major adverse impacts, and this land parcel has minor/moderate impact against Green Belt purpose, most notably in terms of urban sprawl, although the site was previously urban until the 1960's. The Boundary Assessment concludes that the entire section of land between the River Wear, the A182 and Bonemill Lane (incorporating site HGA5) should be removed from the Green Belt, enabling the River Wear and A182 to form a logical and defensible Green Belt boundary (see pages 30-32). The Fatfield area has a very high proportion of greenspace (almost 3 times the city average), which equates to 41ha surplus according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington East Ward has very high levels of amenity greenspace available. The space in question also includes a number of car parking spaces which are used infrequently. Sensitive design will allow the trees on the site to be retained and enable access to the riverside and towards Princess Anne Park. The environmental impacts and loss of open space has been taken into consideration when identifying housing release sites. A Transport Statement has been prepared by the City Council and this demonstrates that the proposed development integrates into the existing transport network with a number of sustainable methods of transport available to access the site. The level of parking has been designed to meet the anticipated demand. The impact of traffic growth on the highway network in the vicinity of the development has been reviewed and it has been found that the proposal would not cause an adverse impact. It is concluded that there are no highway reasons why this development cannot be approved.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Michael	Wanless		PD116	Policy	SS2	Object			Objects to Site HGA6 of Policy SS2 on the grounds that the green space is used by many people for a variety of activities, football being the main one. There must be better options available to deliver extra housing than to take away such a space.				Remove Site HGA6 as a housing allocation.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>

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Gaynor	Hughes-Rixham		PD359	Policy	SS2	Object					Objects to Site HGA6 of Policy SS2 on the grounds that the Policy makes no provision for extra schooling or doctors surgeries and that there would only be one access road to deal with the extra traffic.	No modifications proposed.	(M22). The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.
Ian	Hughes-Rixham		PD369	Policy	SS2	Object				Objects to Site HGA6 of Policy SS2 on the grounds that it is not consistent with Paragraphs 74 and 75 of the NPPF which states that playing fields should be protected.	Objects to Site HGA6 of Policy SS2 on the grounds that the sale of the greenfield site is for monetary reasons and would deny the residents of a facility enjoyed by all for a variety of purposes.	If the proposals are taken forward, would like the relationship of the development to the surrounding areas to be equitable, with an equal buffer provided to all.	The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus land according to the 2012 Greenspace Audit. The 2018 Greenspace Audit confirms that the Washington South Ward has high levels of amenity greenspace available. The 2018 Playing Pitch Plan states that the long term future of the site is to be considered in the context of Parklife local Hub provision at the Northern Area Playing Fields. The site is in use at present, but as part of the Parklife Hub provision is due to cease in 2019. If at that stage, the revised Playing Pitch Plan does identify the site as surplus to need, then CSDP Policy NE4 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss. Further details regarding HGA6 are set out in the Compliance Statement (see Policy SS2 Washington Housing Growth Areas). In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. The Council propose to make a modification to clarify that the site can only be developed if it is considered surplus to requirements (M22).	Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.

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Deborah	Card		PD164	Policy SS2	Object			Objects to Site HGA6 of Policy SS2 on the grounds that it would not be effective.			Objects to Site HGA6 of Policy SS2 on the grounds that is unsustainable as the doctors surgery, school and dentist are already oversubscribed. The site will put increased pressure on these already oversubscribed services.	Remove Site HGA6 from Policy SS2.	The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required. With regards to schools access, the Council's 2018 Education Report (see p8) considers the full impact of all 6 HGA sites on primary and secondary schools in Washington. The Housing Growth Areas within Washington will generate an additional 138 primary school places. There are options available in meeting the identified need by creating extra spaces at two existing primary schools, one in the Washington North area which will increase school capacity by 105 places and one in the south area to ensure demand for school places is adequately accommodated. There would be sufficient primary school places within the appropriate catchment areas. Existing secondary school provision could be accommodated through expansions of existing schools. All to be funded through both S106 contributions and basic need funding from the City Council within the next 5-10 years.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Brian	Card		PD156	Policy SS2	Object			Objects to Site HGA6 of Policy SS2 on the grounds that it would not be effective.			Objects to Site HGA6 of Policy SS2 on the grounds that is unsustainable as the doctors surgery, school and dentist are already oversubscribed. The site will put increased pressure on these already oversubscribed services.	Remove Site HGA6 from Policy SS2.	The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required. With regards to schools access, the Council's 2018 Education Report (see p8) considers the full impact of all 6 HGA sites on primary and secondary schools in Washington. The Housing Growth Areas within Washington will generate an additional 138 primary school places. There are options available in meeting the identified need by creating extra spaces at two existing primary schools, one in the Washington North area which will increase school capacity by 105 places and one in the south area to ensure demand for school places is adequately accommodated. There would be sufficient primary school places within the appropriate catchment areas. Existing secondary school provision could be accommodated through expansions of existing schools. All to be funded through both S106 contributions and basic need funding from the City Council within the next 5-10 years.	The Council considers there has been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
S, Abrahams, PD5758 E, Adams, PD5053 Vicky, Adgar, PD4896 Dorrian, Affleck, PD2522 P, Aitken, PD1497 K, Aitken, PD860 George Edward, Alberts, PD3319 Paul, Aldridge, PD3433 Callum, Aldridge, PD1985 Dominic, Aldridge, PD1983 Alison, Aldridge, PD2024 Riley, Allen, PD4123 Olivia, Allen, PD4624 Susan, Alnwick, PD5208 Alan, Alnwick, PD5464 Alistair, Amour, PD5360 George, Anderson, PD3155 Caroline, Anderson, PD3196 Ava, Anderson, PD3133 George Noah, Anderson, PD3175 Gary, Anderson, PD3405 Carolyne, Anderson, PD2254 W, Ankers, PD2054 Paul, Appleton, PD5849 K H, Appleton, PD4124 Joan, Armstrong, PD4734 Clem, Armstrong, PD2120 Joan, Ashman, PD2974 A, Askew, PD2499 A, Askew, PD2571 Michelle, Aubert, PD4263 Carol, Baggaley, PD735 Paul, Balmer, PD1717				Policy	SS3	Object					Object to the removal of the safeguarded land site from the Green Belt as it places further risk on the adequacy of the infrastructure locally and further afield.	No proposed modification	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, and considers there to be a justified case for safeguarding two areas of land (further details are in the Compliance Statement, Policy SS3). When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer term development needs. Safeguarded Land is considered necessary for a number of reasons. Firstly, it provides a degree of permanence to the Green Belt boundaries put in place by the Plan and ensures that future further reviews of the Green Belt will not be needed at the end of the Plan period. Secondly, it provides flexibility and allows for a Plan review if the council cannot demonstrate a five year land supply. During a Plan review, the reassessment of	The Council considers there has been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Tracy, Balmer, PD1715 Margaret, Banks, PD6034 Dan, Banning, PD2668 Matt, Banning, PD2498 Alan, Barber, PD2191 Ann, Barber, PD5729 Samantha, Barker, PD4173 Sandra, Barker, PD3950 Kenneth, Barker, PD4176 William, Barker, PD5862 Adam, Barnes, PD5198 Alison, Barnes, PD5755 E, Barrass, PD325 M, Barrass, PD338 A, Barrett, PD5454 Amanda, Barron, PD4638 Sheila, Barron, PD4637 Linda, Barron, PD4737 Malcolm, Barron, PD4755 Alice, Barron, PD5607 Amelia, Bateman, PD337 Deborah, Bateman, PD345 John, Bateman, PD2645 Jean, Bateman, PD2644 Peter, Beal, PD4951 Gillian, Beal, PD4938 H M, Bechkok, PD2436 AM, Bechkok, PD2461 Kimberly, Beckwith, PD3407 John, Bell, PD3125 Sheila, Bell, PD3123 I, Bell, PD5406 Angela, Bell, PD1851 Edna, Bell, PD4387 Alan, Bell, PD4383 S, Bell, PD3805 Steve, Bell, PD2815 Frances, Bell, PD3792 Catherine, Bell, PD1772 Nicci, Best, PD1673 Sally, Best, PD1074 Robert, Best, PD3061 Nick, Best, PD3636 Donna, Bishop, PD868 Christopher, Bishop, PD905 Wendy, Black, PD5748 George, Black, PD2135 Patricia, Black, PD1869 Deborah, Blackett, PD4977 David, Blackett, PD1476 Andrew, Blackett, PD1278 Emma, Blackett, PD3965 Fay, Blackie, PD5306 Michelle, Bland, PD2097 Simon, Bland, PD3212 Robert, Bloomfield, PD4377 Sharon, Bloomfield, PD4404 Lilian, Blue, PD1292 Frank, Blue, PD4732 Susan, Booker, PD1584 Howard, Booker, PD1562 Andrew D, Bosworth, PD340 Michelle, Bosworth, PD352 Angela, Bowe, PD3690 Kevin, Boyd, PD4927 Jennifer, Boyd, PD4126 Jennifer, Boyd, PD942 Nikki, Boyle, PD2937 A M, Bradford, PD2590 T E, Bradford, PD2576 Rebecca, Bradley, PD3691 Helen, Brady, PD5990 Tilly, Brady, PD3151 Stephen, Brady, PD3114 Marley, Brady, PD3959 Lee, Brebner, PD1936 Terry, Brereton, PD2137 Elisabeth, Brereton, PD2023 Kevin, Bricknall, PD358 Lynn, Bricknall, PD364 Mildred, Brodie, PD2445 ARTHUR, BRODIE, PD2428 Will, Brooke Lovell, PD6009 Evie, Brooke Lovell, PD6017 Carrie Ann, Brooke-Lovell, PD5830 M, Brooks, PD5076 Kristan, Brown, PD5667 Katherine, Brown, PD2872 Malcolm, Brown, PD4163 Matthew, Brown, PD2850 Alexandra, Brown, PD2913 Steven, Brown, PD2829 T, Brown, PD5139 Mary, Brown, PD6044 Dave, Brown, PD4035 Susan, Brown, PD5621 David, Brown, PD2475 Kenneth, Brunger, PD2076 Maurice, Bryson, PD3773 Jenna, Buglass, PD373 Gary, Bunt, PD5318 John, Burlinson, PD379													Safeguarded Land will involve determining whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as Safeguarded Land until the next review of the Plan.	

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G. Burn, PD4399 F. Burn, PD4491 Carly, Burnett, PD887 Keith, Burnett, PD4067 Kathleen, Burns, PD994 Peter, Burns, PD3366 M. Burrows, PD2904 Paul, Burrows, PD2893 Jorja, Burrows, PD2936 Mitchell, Butler, PD2536 Stephen, Butler, PD391 Christine, Butler, PD385 Gary, Cairns, PD2928 Keith, Cameron, PD3336 Jacqueline, Cameron, PD3312 Vera, Carr, PD1871 Ada, Carr, PD4525 Peter, Carr, PD4897 W. Carrick, PD3210 Kathleen, Carroll, PD2810 Mary, Cartwright, PD1596 Peter, Cartwright, PD1485 Michael, Caruana, PD4131 Samantha, Carver, PD4222 Rachel, Chadwick, PD1294 Daniel, Chadwick, PD1295 Laura, Chambers, PD4272 Dorothy, Chandler, PD1934 Frank, Chandler, PD1896 Robert, Charlton, PD4790 Sarah, Charlton, PD4711 G. Chicken, PD2858 Ingrid, Chidgey, PD399 R.W. Chilton, PD3830 Joan, Chilton, PD3884 Colin, Clark, PD2390 Maria, Clark, PD2476 M. Clark, PD2746 Brian, Clarke, PD406 Gina, Clarke, PD425 Victoria, Clayton, PD2141 Deborah, Clayton, PD1849 Ian, Clayton, PD2189 Lynn, Clayton, PD2095 Sophie, Cleasby, PD2497 A. Clements, PD2747 N.D. Clements, PD2678 Marion, Coats, PD2405 Ron, Codling, PD3776 B.M. Codling, PD3508 Alan, Coleclough, PD5107 Dorothy M. Coleclough, PD3578 James, Colledge, PD3083 Muriel, Colledge, PD3047 Alice, Colligan, PD4822 Elizabeth, Collins, PD3059 Laura, Condren, PD5425 Peter, Condren, PD5436 Olive, Cook, PD2618 Gemma, Cooke, PD4277 David, Cooper, PD2142 Evelyn, Cooper, PD1710 William, Cooper, PD3434 Carolyn J. Cooper, PD5336 Dave, Cooper, PD3236 Samuel, Cooper, PD430 Dawn, Cooper, PD3234 R.L. Cooper, PD3474 Margaret, Copeland, PD2929 M. Corrigan, PD2045 Peter, Cottle, PD4933 Sara, Coulson, PD4556 Frances, Cowie, PD2861 Nicola, Cowie, PD1159 Niamh, Cowie, PD934 Hannah, Cowie, PD2474 Neil Edward, Cowie, PD2463 Melanie, Craig, PD5794 Dean, Craig, PD4789 Linda, Cryan, PD1101 J.D. Cullen, PD3321 P.W. Cullen, PD3296 P.J. Cullen, PD2557 Beth, Cullen, PD5106 Richard, Curtis, PD5688 SARAH, CURTIS, PD5627 I. Dalby, PD1368 T. Dalby, PD1554 Anna, Dalby, PD4114 Steven, Dalby, PD3846 Imogen, Dalby, PD3871 Charlotte Elizabeth, Dalby, PD4120 M. Dawson, PD2996 A. Dawson, PD6021 Violet, Denham, PD440 Len, Denham, PD435 Dean, Derbyshire, PD5466 Joe, Devannney, PD451 Angela, Devannney, PD445 Jonathan, Dewart, PD2055 Bill, Dick, PD456 Christine, Dick, PD462														

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Alan, Dinning, PD5030 Ann, Dinning, PD5154 Sam, Dinsley, PD1565 Susan, Dinsley, PD1542 Shaun, Dinsley, PD1521 Brenda, Dodd, PD6033 E, Dodds, PD5409 J, Dodds, PD1650 John, Donnison, PD4934 Angela, Dover, PD5844 Keith, Dover, PD5842 John, Dowson, PD4271 Theo, Drummond, PD4677 Oliver, Drummond, PD4605 Kristopher, Drummond, PD5840 Kelly, Dryden, PD3572 Antony, Dryden, PD3744 Coel, Dryden, PD3749 Rhys, Dryden, PD3907 Katie, Dunbar, PD468 Kevin, Dunn, PD5103 Brian, Dunn, PD5691 Denise, Dunn, PD5647 Robert M, Edgar, PD3350 Patricia M, Edgar, PD3315 Vicki, Edmunds, PD4331 Janine, Edworthy, PD3203 Ian, Edworthy, PD5258 Bridget, Edworthy, PD3046 Miranda, Edworthy, PD3253 Paul, Ehrhardt, PD2307 Dianne, Ellwood, PD3124 William, Evans, PD5510 Joan, Evans, PD2554 Deborah, Ewart, PD4655 Kate, Ewart, PD5144 Stephen, Ewart, PD4647 Eleanor, Ewart, PD5161 James, Ewing, PD4373 Edward, Failes, PD1286 Maureen, Failes, PD1445 Amy, Falcus, PD3637 Craig, Falcus, PD3513 K, Faulkner, PD2698 N J, Faulkner, PD2721 Stephen, Fay, PD3835 Pauline, Fenwick, PD953 Colin, Fenwick, PD1056 David Alan, Fenwick, PD1288 Lynn, Fenwick, PD1334 Ronald, Ferguson, PD2136 E, Fife, PD4867 Amy, Fife, PD4908 Grahame, Fife, PD4909 Mark R, Fife, PD2478 Julie, Fife, PD2603 Adam, Finch, PD4836 Terry, Firman, PD1082 James Donnison, Fletcher, PD1155 O, Fletcher, PD1032 D, Flinn, PD5989 C A, Flinn, PD5930 R, Florance, PD1456 Heather, Florance, PD5789 Neil, Foggin, PD4798 Sandra, Foggin, PD2255 DW, Foggin, PD2219 Jacquelin, Foggin, PD4895 Brenda, Foote, PD3900 Richard, Foreman, PD5224 Jeannette, Forrester, PD6032 J, Forster, PD2502 Sonia, Forster, PD3910 David, Forster, PD3966 Heather, Forster, PD473 Steven, Forster, PD5889 Janine, Forster, PD1569 Elsie, Foster, PD3804 Cliff, Fothergill, PD4641 Elaine, Fothergill, PD4561 Stacie, Fothergill, PD4545 Hazel, Framingham, PD479 Heather, Francios, PD4529 Kenneth, Francios, PD4580 Isabel, Franklin, PD5305 Mark, Franklin, PD5137 Peter, Franklin, PD4031 M, Freeman, PD1923 JG, French, PD827 V, French, PD846 P, Gale, PD5991 Deborah, Gallagher, PD1127 John, Gallagher, PD2220 Tom, Gallagher, PD2347 John, Gallagher (Senior), PD2315 Katrina, Garnett, PD3746, Linda, Garnett, PD3053, Ronald, Garnett, PD2653, S, Garrett, PD2570, D, Garrett, PD1641, Craig, Gartland, PD3926, Emma, Gatens, PD1675,														

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Mark, Gatens, PD1640, James, Gatens, PD8508, Amelia, Gatens, PD2150, Dawn, Gauld, PD4205, Chris, Gibson, PD4239, Ravender, Gill, PD3517, Zac, Gillbanks, PD5686, Ann Marie, Gillbanks, PD5579, Julie, Giloney, PD4422, M E, Glaister, PD2391, Lesley, Godfrey, PD5279, Julie, Goding, PD4282, Keeley, Gordon, PD485, Phil, Gordon, PD490, Christine, Goss, PD4481, Sarah, Gough, PD3735, David, Grady, PD3302, Janice, Graham, PD495, Colin, Gransbury, PD2218, Irene, Gransbury, PD2216, Carl John, Grant, PD502, Margaret Ann, Grant, PD507, Peter Alexander, Grant, PD5196, Ann Mildred, Grant, PD2933, Ronald Malcolm, Grant, PD2859, Paul, Gray, PD2276, Chris, Green, PD1231, Jean, Green, PD3509, Philip, Greenup, PD1958, Catherine, Greenup, PD1960, Kate, Gregory, PD5532, Ben, Gregory, PD5596, Josh, Grey, PD5476, Stuart, Griffiths, PD4322, Lucy, Griffiths, PD4537, Claire, Guy, PD4733, Susan, Hall, PD1424, Adam, Hall, PD5055, Stephen, Hall, PD4400, Roslyn, Hall, PD4431, Julie, Hall, PD2677, Jonathan, Hall, PD1910, Maureen, Hamilton, PD1361, Elaine, Hamilton, PD1359, Valerie, Hancock, PD2403, John, Hancock, PD5179, Joanna, Hand, PD517, Christopher, Hand, PD512, Denise, Hannan, PD522, Jake, Hannan, PD1935, Mark, Hannan, PD1812, Paul, Hanson, PD3222, Louise, Hanson, PD3270, Stuart, Harding, PD2469, Michael, Harding, PD5260, Michael, Harding, PD5259, Sophie, Harding, PD2309, Emma, Hardy, PD2667, Angela, Hardy, PD2438, Adam, Harper, PD2226, Lisa, Harris, PD3566, Ian, Harris, PD3567, Paul, Harris, PD2114, Anna Marie, Harris, PD3565, Gillian, Harris, PD1826, Janet, Harrison, PD2932, Andrew, Hartley, PD3471, Naomi, Hartley, PD3446, Aurora, Hartley-Hewitson, PD5611, Lynn, Hartridge, PD3655, Allen, Hartridge, PD1752, Demi, Hawyes, PD528, Margaret, Haywood, PD5085, Nigel, Hems, PD4700, E, Henderson, PD3345, Gemma, Henderson, PD3825, K, Hepburn, PD3920, Wendy, Hewitson, PD3421, Kasia, Heywood, PD2233, Philip, Higgins, PD4830, David, Higgins, PD3772, Pauline, Higgins, PD3747, Geoffrey, Higgins, PD3731, R, Hillier, PD1115, E, Hillier, PD3304, Callum, Hills, PD2291, Karen, Hills, PD3084, Kenneth, Hills, PD3237, Michael, Hills, PD2105, Caroline, Hills, PD3085, Michelle, Hills, PD2342, Andy, Hird, PD3064, Ruth, Hirst, PD4707, Margaret, Hodgson, PD1357, Elizabeth, Hogg, PD4075, Michael, Hogg, PD5108, Paris, Holland, PD5792, Janice, Holmes, PD4588, Rhiannon, Holmes, PD4323, Trevor, Holmes, PD4324, Bill, Holmes, PD5478, S M, Holt, PD1287,														

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Allen, Hope, PD1247, Ryan, Hope, PD2643, Andrea, Hope, PD5520, Elonor, Horne, PD2513, Sarah, Horne, PD1552, Joyce, Horne, PD1698, Gary, Horne, PD3473, David, Horrigan, PD2971, Sarah, Horrigan, PD2809, Jane, Horrigan, PD2807, Keith, Horrigan, PD2973, Norma, Houghton, PD3211, Stephen, Houghton, PD1742, Amelia, Hudson, PD3062, Stephen, Hudson, PD3628, Isabella, Hudson Walker, PD535 Marc, Hughes, PD8315, Nicola, Hurst, PD1771, Jess, Illingworth, PD2623, David, Ingram, PD4028, Sue, Ingram, PD4008, E, Irwin, PD2437, Robert, Jackson, PD4439, Donna, Jackson, PD4440, Stella, Jacques, PD653, W, Jacques, PD2602, Mark, Jahn, PD2028, Janet, Jamieson, PD2556, Norman, Jamieson, PD2555, M A, Jennings, PD1895, John, Jennings, PD5664, J, Jeruskau, PD4292, Alma, Jobling, PD3511, L, Jobling, PD1099, D, Jobling, PD1091, Peter, Jobling, PD4483, Gavin, Johnson, PD5025, Robert, Johnson, PD5750, Mavis, Johnson, PD2680, Catherine, Johnson, PD4287, Relia, Jonas, PD5965, SA, Jones, PD5872, L, Jones, PD5751, Jensen, Jones, PD3571, Elliot, Jones, PD3633, Sarah, Jordison, PD4033, Brian, Jordison, PD4032, Ann Lorraine, Jordison, PD5979, Kristian, Judge, PD540, Linda, Judge, PD545, Dennis, Judge, PD5411, Suzie, Kaszefko, PD4891, Gregory, Kaszefko, PD4600, Surena, Kaur, PD3479, Anisha, Kaur, PD3454, Francesca, Keith, PD555, Alexander, Keith, PD550, Tony, Kelly, PD5183, Claire, Kelly, PD1732, Ronan, Kenny, PD2572, Diana, Kenny, PD1192, Lisa, Kimber, PD2245, Sean, Klein, PD5521, Dennis, Lambton, PD5192, Christopher, Lane, PD4944, Caroline, Lane, PD4881, Joanne, Langley, PD5255, David, Langley, PD4831, Zack, Langley, PD5404, Katie, Langley, PD5914, Abbie, Langley, PD1326, Will, Langley, PD1358, Beth, Lawrence, PD2071, Lyn, Laws, PD3477, Victoria, Laws, PD4555, David, Leach, PD4571, Audrey, Leach, PD5797, Vivienne, Lee, PD4091, M, Lewins, PD4791, W, Lewins, PD4792, Joan, Liddle, PD3974, Wendy, Lindsay, PD4174, Joanne, Liso, PD2409, Richard, Littlejohn, PD4726, M, Livingstone, PD2601, Michele, Llanaez, PD5953, Dan, Llanaez, PD5067, Olivia, Llanaez, PD5064, Danielle, Llanaez, PD5004, Amanda, Llanaez, PD4986, Morgan, Llanaez, PD4729, Annie, Loadman, PD3623, Alison Jane, Logan, PD5806, Stuart, Logan, PD5692, Annabel, Logan, PD5649, Rachel, Luke, PD3707, Stephen, Luke, PD3681, Richard, Lumsdon, PD5569, Gemma, Lumsdon, PD5538, Peter, Lynn, PD1386, Carol, Lynn, PD1428, Louise, Lynn, PD3621,														

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<p>Helen, MacKay, PD560, Frank, Maghie, PD566, Stephanie, Mallam, PD4339, Ann, Manning, PD5035, Vahik, Mardirossian, PD1023, Emily Jane, Marriner, PD572, Amy, Marshall, PD1558, Elizabeth, Martin, PD3161, Amelia, Maxwell, PD760, Magdalena, Mazurek, PD4659, Malcolm, McArthur, PD964, Margaret, McArthur, PD315, Norma, McBride, PD1509, Thomas, McBride, PD3134, Kim, McBride, PD1530, Shaun, McCaffery, PD2887, S, McCaffery, PD2778, Jacqueline, McCaffrey, PD4963, David, McCaffrey, PD4979, T, McCartney, PD5296, D E, McCartney, PD5265, David, McClerence, PD5890, Ann, McCulla, PD3724, Andrew, McCulla, PD3686, Steven, McGill, PD4036, Karen, McGill, PD4003, Lee, McGill, PD3702, Craig, McGill, PD4081, Lynn, McInnes, PD4436, R, McInnes, PD5345, F, McInnes, PD5516, Gwynneth, McIntyre, PD3266, Daniel, McIntyre, PD3280, Brett, McIntyre, PD5625, A E, McKeon, PD4863, J, McKeon, PD4864, Claire, McLean, PD3688, Gillian, McMahon, PD1475, Claire, McMillan, PD4742, Emily, McNulty, PD5715, Gillian, McNulty, PD5685, Sophie, McNulty, PD5657, Greg, McPeake, PD577, Tracy, McPeake, PD584, C, Meek, PD2078, D, Meek, PD1212, I, Metcalf, PD2930, Denise, Milburn, PD1670, Alan, Milburn, PD3738, Susanne, Miller, PD1600, Audrey, Miller, PD1046, Richard, Miller, PD3964, E.Joan, Miller, PD5017, Graeme, Miller, PD1751, Garry, Miller, PD2259, Louise, Miller, PD4362, PM, Miller, PD3989, E, Mitton, PD5063, Maureen, Monaghan, PD1753, Ron, Monaghan, PD2180, D, Moore, PD5891, Daniel, Moravanszky, PD2491, Leon, Morgan, PD1063, Marian, Morgan, PD1049, V, Morgan, PD8513, Bill, Morrell, PD1447, Yvonne, Morrell, PD1446, Edith, Morris, PD4084, Andrea, Morris, PD4139, Ray, Morris, PD1363, Patricia, Morris, PD1163, David, Morris, PD782, Brian, Morrissey, PD2710, Maureen, Morrow, PD1012, Peter, Mossop, PD1846, Rhoda, Mossop, PD1845, Tim, Mount, PD1325, D, Mulholland, PD1661, Jean, Mulholland, PD1720, James, Mulholland, PD1696, Lindsey, Mulholland, PD1714, G, Mullen, PD2806, J G, Mullen, PD2743, Sue, Murdy, PD5268, Clifford, Murdy, PD5720, Colin, Murison, PD3788, Elizabeth, Murison, PD3814, Erik, Murison, PD2140, Emily, Murison, PD2160, J, Murison, PD2172, M, Murison, PD4178, Daniel, Murison, PD4194, Bethany, Murison, PD4215, Kathryn, Murison, PD4244, Kelly, Murray, PD1844, Elizabeth, Myers, PD2230, George, Myers, PD2077, Iris, Myers, PD1290, C, Nelson, PD5337, Paul, Nelson, PD1852, Rachel, Nelson, PD1773, Ian, Nelson, PD5140,</p>														

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<p>P, Nelson, PD5202, John, Nesbit, PD4043, Clare, Nesbit, PD4241, John, Nesbitt, PD1230, Alison, Nesbitt, PD2716, Scott, Nesbitt, PD2717, Rachel, Nesbitt, PD1439, Jordan, Nesbitt, PD2718, Conor, Nesbitt, PD2719, Stephen, Nesbitt, PD2720, Danielle, Nesbitt, PD5896, Margaret, Nesbitt, PD3205, R, Neville, PD5576, C, Neville, PD5626, Dennis, Nuttall, PD3293, Sheila, Nuttall, PD3271, Lynda, O'Leary, PD4948, S, Oliver, PD3030, Elizabeth, Oliver, PD3024, Eric, Oliver, PD2979, Gwenyth, Oliver, PD2958, Melissa, Oliver, PD3390, Debbie, Oliver, PD5311, Kevin, O'Neill, PD3625, Kevin, O'Sullivan, PD596, Elizabeth, O'Sullivan, PD590, Alan, Oxley, PD3949, P, Panther, PD5515, Grahame, Parker, PD1001, Catherine, Parker, PD1289, Keith, Parker, PD8519, Christopher, Parker, PD5195, Katie, Parker, PD5831, Fiona, Parker, PD2863, M, Parkin, PD3204, George, Parkin, PD3202, Susan, Patrick, PD8298, R, Patterson, PD1544, Daniel, Patterson, PD1209, Andrew, Patterson, PD1687, Matthew, Patterson, PD1246, Victoria, Patterson, PD1157, W A, Pattison, PD1814, E.D, Pattison, PD1813, Malachi Payne, PD4814, Michael, Payne, PD4750, Talia, Payne, PD4212, A H, Pearce, PD3360, Joan, Pearson, PD3320, Jim, Pearson, PD3485, Amanda, Pearson, PD3630, Patricia, Peele, PD3465, Chris, Pescod, PD602, Adrian, Pickering, PD5138, Janet, Pickering, PD619, K, Pickup, PD5496, David, Pickup, PD5589, Thomas, Pickup, PD5574, Dale, Pilkington-Smith, PD1177, Sheila, Platt, PD3852, Judith, Platt, PD2370, Jeffrey, Platt, PD3880, Karen, Pooley, PD5379, Keian, Pooley, PD5944, Tazmin, Pooley, PD5826, Ryan, Pooley, PD5783, Dillion, Pooley, PD5741, John, Pooley, PD5705, Tarryn, Pooley, PD3936, William, Portsmouth, PD5606, Mark William, Portsmouth, PD5613, George, Postle, PD4533, L, Potter, PD3087, S, Potter, PD3111, N, Potter, PD5561, Samantha, Potts, PD4608, Shauni, Pringle, PD2335, Janice, Pringle, PD2334, Tracey, Pyburn, PD625, Luke, Pylan, PD616, Jon, Quine, PD5203, Helen, Quinn, PD2862, Robert, Quinn, PD2750, Margaret, Quinn, PD3498, L, Rae, PD634, D, Rae, PD5370, Nicola, Rae, PD1885, Ian, Ramsay, PD3668, Wendy, Ramsey, PD642, Jacob, Ramshaw, PD5839, Rosie, Ramshaw, PD5999, Joanne, Ramshaw, PD5972, James, Ramshaw, PD3179, Rachel, Ray, PD5926, James, Ray, PD5832, K, Reay, PD1555, Laurence, Reay, PD970, Simon, Reay, PD955, Christopher, Reay, PD2260, Janet, Regan, PD2362, Lisa, Reid, PD1360, Craig, Reid, PD5042,</p>														

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Anne, Rennie, PD662, Michael, Rennie, PD667, Stephen, Reveley, PD776, Julie, Reveley, PD3128, Alexia, Reynolds, PD1356, Jorge, Reynolds, PD1354, Gillian, Reynolds, PD1210, Anthony, Reynolds, PD1208, Amelia, Reynolds, PD1207, Malcolm, Richardson, PD1618, Claire, Richardson, PD973, Susan, Richardson, PD1654, J, Richardson, PD1634, Katrina, Ridley, PD694, Christopher, Ridley, PD675, Julie, Ridley, PD5307, Graeme, Ridley, PD2290, Catherine, Ritchie, PD704, Robin, Ritzema, PD3400, Linda, Ritzema, PD3399, Philip, Ritzema, PD4505, William, Robertson Walker, PD740 Amie, Robinson, PD4304, Ruth, Robinson, PD3992, Maureen, Robinson, PD4578, Keith, Robinson, PD4497, Kate, Robinson, PD1962, Callum, Robinson, PD5178, Hannah, Robinson, PD4803, Nicole, Robinson, PD5410, John, Robinson, PD2790, Maureen, Robinson, PD2793, Will, Robinson, PD2791, Simon, Robinson, PD729, Peter, Robinson, PD716, Evan, Robinson, PD4988, Sharon, Robinson, PD8329, Yvonne, Robson, PD4308, Dorothy, Robson, PD2308, Owen, Robson, PD5908, Les, Robson, PD1426, Luke, Robson, PD5127, Jane, Robson, PD5800, Gordon Alan, Robson, PD5924, Lyndsey, Robson, PD5923, T, Robson, PD4196, Kenneth, Robson, PD2374, Rachael, Rodger, PD2031, Julie, Rodger, PD2029, S, Rodger, PD2027, Lindsey, Ross, PD2186, Erlinda, Ross, PD2188, Lucy, Rouse, PD1924, Charlie, Rouse, PD1984, Millie, Rouse, PD1891, Paul, Routledge, PD3418, Brian, Rowntree, PD3756, P, Rudd, PD5094, Steven, Sambers, PD4233, Joss, Savory, PD3141, Angela, Savory, PD3172, Jason, Sayers, PD4354, T, Scott, PD5605, M, Scott, PD5759, Bryan, Scott, PD2234, Madeleine, Scott-Gray, PD2619, Irene, Searle, PD816, Ronnie, Senior, PD1598, Betty, Senior, PD1599, Chris, Shaftoe, PD5405, Pauline, Shaftoe, PD6046, Tom, Shaftoe, PD1486, Suzanne, Shaftoe, PD1488, Kevin, Sheppard, PD2022, Mason, Shotton, PD2422, June, Simpson, PD3683, George, Simpson, PD4669, Debbie, Simpson, PD4670, Ronald John, Simpson, PD756, Chris, Simpson, PD748, Tristan, Simpson, PD5845, Amer, Singh, PD3494, Greg, Skeoch, PD5666, Rachel, Skeoch, PD5669, Joan, Slowther, PD4706, Kenneth, Slowther, PD5964, Doreen, Smith, PD1801, Kelly, Smith, PD6188, Jordan, Smith, PD6160, John, Smith, PD1390, Joan, Smith, PD1603, Charlotte, Smith, PD3435, Raymond, Smith, PD1002, Anita, Smith, PD1262, John, Smith, PD1298, Morris, Smith, PD1800, Susan, Smith, PD1489, Ian, Stafford, PD4255, June, Stafford, PD4289, Jessica, Stafford, PD5177, Alan, Stavers, PD4415, Jayne, Steanson, PD4643,														

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Anna, Steanson, PD4494, Olivia, Steanson, PD4584, Mark, Steanson, PD4575, Marjorie, Stephenson, PD3951, Carole, Stephenson, PD1893, Peter, Sterling, PD3544, A, Stevens, PD2011, Alan, Stoddart, PD764, Alison, Stoddart, PD5241, Irene, Stoker, PD2256, H, Stoker, PD2310, Catherine, Stokoe, PD2934, Craig, Stokoe, PD3573, Dan, Stokoe, PD3909, Matthew, Stubbs, PD4066, T, Suchecki, PD5841, David, Sunley, PD2093, Lynda, Sutton, PD4155, Paul, Sutton, PD4148, Deborah, Swaddle, PD927, Michelle, Sweeney, PD771, P, Sweeney, PD1227, Barry, Taylor, PD3364, Gordon, Taylor, PD3624, Ben, Taylor, PD3651, G, Taylor, PD803, B, Taylor, PD789, Linsey, Taylor, PD3564, Greg, Taylor, PD5397, Mollie, Taylor, PD3432, David, Taylor, PD3537, Joshua, Taylor, PD3596, Jean, Taylor, PD5343, Lynn, Taylor, PD3660, Neil, Taylor, PD1964, Joyce, Taylor, PD1947, Steve C, Templeman, PD4535, Martin, Terry, PD5612, Joyce, Tetlow, PD5344, Kathryn, Tew, PD3346, F J, Thirlaway, PD2371, I, Thirlaway, PD2373, Jeremy, Thomas, PD1129, Steve, Thomas, PD3530, Jo, Thomas, PD8525, Delice V, Thompson, PD1894, Jack, Thompson, PD4047, Angela, Thompson, PD1775, David, Thompson, PD1774, Daniel, Thompson, PD5001, Andrew, Thompson, PD5401, Claire, Thompson, PD5469, Gladys, Thompson, PD3130, Allan, Thompson, PD1737, Chris, Thomson, PD4853, Maxine, Thornley, PD5346, Heather, Thornley, PD5435, Alex, Thornley, PD5542, Leanne, Tiffen, PD2992, Eva, Tiffen, PD1066, Alan, Tiffen, PD1035, Janette, Tiffen, PD2966, Terence, Tiffen, PD3036, Darren, Tiffen, PD3759, David, Todd, PD4206, James, Tracey, PD1975, Claire, Treadwell, PD3856, Sam, Treadwell, PD3855, John, Trewwhitt, PD4893, M, Trewwhitt, PD1712, Leslie, Trotter, PD2332, Lewis, Tuff, PD4613, Dianne, Tully, PD4046, John, Turnbull, PD5894, Clare, Turnbull, PD829, J H, Turnbull, PD1664, Emma, Turnbull, PD2533, Maureen, Turnbull, PD1662, Tracy, Turnbull, PD5338, Malcolm, Turnbull, PD4238, M, Turner, PD1425, Erin, Urwin, PD840, Nancy, Urwin, PD4450, Christine, Urwin, PD2380, Ray, Urwin, PD2312, Gemma, Venus, PD1409, Martin, Venus, PD825, Carole, Vorley, PD798, Neil, Waite, PD4797, Pauline, Waite, PD6045, Jill, Waite, PD5618, Michael, Wales, PD4435, Daniel, Wales, PD4458, Debbie Jane, Walker, PD852, Florence, Walker, PD1102, Amanda, Wallace, PD747, William James, Ward, PD985, Christina, Ward, PD3007, James, Warne, PD3303, Lynne, Warne, PD2857, Maureen, Watson, PD4834, H, Watson, PD1156,														

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<p>J. Watson, PD1078, Danielle, Watson, PD869, Joanne, Watson, PD882, Paul, Watson, PD903, Julie, Watson, PD4774, Laura, Watson, PD5479, Martin, Watson, PD5335, J T, Watson, PD4607, David, Watson, PD6012, Veronica, Watson, PD5900, Peter, Watson, PD5470, P. Weatherburn, PD3897, Malcolm, Weatherburn, PD4496, Xenia, Webster, PD1799, Mark, Weddle, PD913, Julie, Weedy, PD1213, Helen, Weir, PD4118, David, Weir, PD4099, Eileen, West, PD2898, R A, White, PD1116, Ann, White, PD1128, D. Whitfield, PD1465, F. Whitfield, PD1450, Maureen, Whittaker, PD1019, Matty, Wild, PD5915, K, Wilkinson, PD705, D, Wilkinson, PD721, G, Wilkinson, PD2763, Helen, Wilkinson, PD2740, M, Wilkinson, PD690, J, Wilkinson, PD674, Eleanor, Williams, PD3857, Lucy, Williams, PD4049, Carl, Williams, PD4704, L, Williams, PD4536, Lee, Williams, PD918, Thomas, Williams, PD2143, Sara, Williams, PD928, Sylvia, Williams, PD2839, Brian, Williams, PD2789, Laura, Williams, PD5690, Phillip, Williams, PD5007, Brenda, Wilson, PD6011, Katie, Wilson, PD5912, Oliver, Wilson, PD4975, Deborah, Wilson, PD5638, James, Wilson, PD5552, Melanie, Wilson, PD644, Clare, Wood, PD4014, Dale Royce, Wood, PD5518, M, Wood, PD945, J, Wood, PD2508, Ciaran, Wood, PD3888, Madaleine, Wood, PD3866, M, Wood, PD3710, CH, Wood, PD1098, Michelle, Wood, PD3401, Stephen, Woodbridge, PD3292, Lucy, Woolley, PD2666, David, Woolley, PD2620, S, Wright, PD4346, Nicola, Wylde, PD2864, Barry, Wylde, PD3106, Gary, Yeaman, PD4432, Olivia, Yeaman, PD5225, Miley, Yeaman, PD4321, Danielle, Yeoman, PD3806, John, Young, PD5120, Helen, Young, PD4912,</p>														
Amy F	Ward	Barratt David Wilson Homes	PD5324	Policy	SS3	Object	Barratt David Wilson Homes support the conclusion that exceptional circumstances exist and the case for releasing the Green Belt, but consider their site at Washington Meadows should be allocated. The site is a natural expansion of Washington, accommodating 1,250 dwelling over two phases. Phase 1 for 750 and phase 2 for 500 homes. BDW have an option in the site to bring it forward for development. The site is considered to be suitable for development, with green/blue linkages, attention to the ecological enhancement and footpaths, able to deliver a Primary	Barratt David Wilson Homes support the conclusion that exceptional circumstances exist and the case for releasing the Green Belt, but consider their site at Washington Meadows should be allocated. The site is a natural expansion of Washington, accommodating 1,250 dwelling over two phases. Phase 1 for 750 and phase 2 for 500 homes. BDW have an option in the site to bring it forward for development. The site is considered to be suitable for development, with green/blue linkages, attention to the ecological enhancement and footpaths, able to deliver a Primary	Barratt David Wilson Homes support the conclusion that exceptional circumstances exist and the case for releasing the Green Belt, but consider their site at Washington Meadows should be allocated. The site is a natural expansion of Washington, accommodating 1,250 dwelling over two phases. Phase 1 for 750 and phase 2 for 500 homes. BDW have an option in the site to bring it forward for development. The site is considered to be suitable for development, with green/blue linkages, attention to the ecological enhancement and footpaths, able to deliver a Primary	Barratt David Wilson Homes support the conclusion that exceptional circumstances exist and the case for releasing the Green Belt, but consider their site at Washington Meadows should be allocated. The site is a natural expansion of Washington, accommodating 1,250 dwelling over two phases. Phase 1 for 750 and phase 2 for 500 homes. BDW have an option in the site to bring it forward for development. The site is considered to be suitable for development, with green/blue linkages, attention to the ecological enhancement and footpaths, able to deliver a Primary	Washington Meadows should be allocated for housing in the plan period and phase 1 should be allocated.	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 portrays a clear contrast to the BDW Homes statement in that the site has moderate impact on Green Belt purpose (see pages 135 and 179), in particular in relation to countryside openness and urban sprawl. On site, the area clearly consists of open countryside, which is further underlined by the nature of the site being physically detached from neighbouring residential areas to the west by the Leamside Line corridor. From the edge of the Leamside Line and to the north of the employment land that flanks Washington Road, the landscape is immediately flat and open and dominated by large agricultural fields, stretching into the distance, and supporting the wide stretch of Green Belt countryside that serves to separate Sunderland and Washington from Gateshead and South Tyneside. The Council does not consider it justified to allocate this site. This site is safeguarded and cumulative impacts on the site have not been assessed.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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								School and District Centre, and create public transport linkages as part of the IAMP. There are significant employment opportunities at Nissan. The site is achievable as technical work has been undertaken and there are no technical issues which would prevent development. The Transport Appraisal concludes that highways mitigations associated with IAMP would facilitate delivery of phase 1 without compromising the Council's ability to deliver IAMP prior to 2031. The entire site could be accommodated with the duelling of the A1290. In regards to Flood Risk, it has been confirmed that the attenuation required on site and demonstrated the suitability of the area. The majority of the site is of low ecological value.	School and District Centre, and create public transport linkages as part of the IAMP. There are significant employment opportunities at Nissan. The site is achievable as technical work has been undertaken and there are no technical issues which would prevent development. The Transport Appraisal concludes that highways mitigations associated with IAMP would facilitate delivery of phase 1 without compromising the Council's ability to deliver IAMP prior to 2031. The entire site could be accommodated with the duelling of the A1290. In regards to Flood Risk, it has been confirmed that the attenuation required on site and demonstrated the suitability of the area. The majority of the site is of low ecological value.		School and District Centre, and create public transport linkages as part of the IAMP. There are significant employment opportunities at Nissan. The site is achievable as technical work has been undertaken and there are no technical issues which would prevent development. The Transport Appraisal concludes that highways mitigations associated with IAMP would facilitate delivery of phase 1 without compromising the Council's ability to deliver IAMP prior to 2031. The entire site could be accommodated with the duelling of the A1290. In regards to Flood Risk, it has been confirmed that the attenuation required on site and demonstrated the suitability of the area. The majority of the site is of low ecological value.	School and District Centre, and create public transport linkages as part of the IAMP. There are significant employment opportunities at Nissan. The site is achievable as technical work has been undertaken and there are no technical issues which would prevent development. The Transport Appraisal concludes that highways mitigations associated with IAMP would facilitate delivery of phase 1 without compromising the Council's ability to deliver IAMP prior to 2031. The entire site could be accommodated with the duelling of the A1290. In regards to Flood Risk, it has been confirmed that the attenuation required on site and demonstrated the suitability of the area. The majority of the site is of low ecological value.			
John	Tumman	Sunderland Civic Society	PD677	Policy	SS3	Object						Consider policy SS3 Safeguarded land not to be justified as has objected to the removal of green belt land east of Washington and south of Springwell and designation of these areas as safeguarded land. Sites should be reinstated as Green Belt land.	Policy SS3 safeguarded land deleted from the plan and areas reinstated as green belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, and considers there to be a justified case for safeguarding two areas of land (further details are in the Compliance Statement, Policy SS3). When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer term development needs. Safeguarded Land is considered necessary for a number of reasons. Firstly, it provides a degree of permanence to the Green Belt boundaries put in place by the Plan and ensures that future further reviews of the Green Belt will not be needed at the end of the Plan period. Secondly, it provides flexibility and allows for a Plan review if the council cannot demonstrate a five year land supply. During a Plan review, the reassessment of Safeguarded Land will involve determining whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as Safeguarded Land until the next review of the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mary	Peel		PD8431	Policy	SS3	Object			Concern that the removal of Green Belt South East of Springwell would place further risk on local infrastructure and elsewhere.		Concern that the removal of Green Belt South East of Springwell would place further risk on local infrastructure and elsewhere.	Concern that the removal of Green Belt South East of Springwell would place further risk on local infrastructure and elsewhere.	No Modification proposed.	A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification for these Policies and sites can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.	
Unknown		Church Commissioners For England	PD5246	Policy	SS3	Object						Consider that Phase 2 of the south of Ryhope site does not contribute to the five purposes of the Green Belt and should be allocated for housing. However, if minded to retain the site in the Green Belt, it should be designated as safeguarding land to provide additional flexibility for housing delivery.	If minded to retain Phase 2 of south of Ryhope site in Green Belt, designate it as Safeguarded Land.	The reasons for the Council not supporting this site as safeguarded land are as follows. The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 112-114 that the proposed development land (Phase 2) would have a fundamental impact on the Green Belt (namely in terms of urban sprawl and countryside encroachment). Furthermore, the impact to settlement merging between Sunderland and Seaham is significant, virtually reducing the Green Belt gap to the County Durham side only. The Church Commissioners make reference to the original Stage 1 Green Belt Review carried out by the Council, which at the time stated that there were 'exceptional strategic circumstances' that warranted further consideration of this site, as it was included as part of a larger 'Location for Major Development' site. However, neither the 2017 or 2018 versions of the CSDP support this area as forming part of the South Ryhope site within the SSGA, nor is it included within the SSGA Masterplan. This was a consideration in the 2016 Growth Options consultation and is no longer applicable. Both Green Belt reports make clear that the land in question provides a fundamental role to Green Belt purpose and it should remain as such. In terms of biodiversity, the Council additionally considers that the proximity of Ryhope Dene Local Wildlife Site (which forms Ancient Semi-Natural Woodland) together with the proximity of the European protected coastline (which thereby invokes significant Habitats Regulations Assessment issues) are highly significant factors that limit further development within this area. The need to minimise further encroachment by residents and domestic pets onto the coastline, and need to retain significant buffers to Ryhope Dene are fundamental principles identified in both the CSDP and the SSGA Masterplan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1392	Policy	SS3	Object					CPRE put forward that a proposal to take land out of the Green Belt in case it is required in the future for housing does not amount to an "Exceptional Circumstance" and is therefore not justified. Overall, exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker	CPRE put forward that a proposal to take land out of the Green Belt in case it is required in the future for housing does not amount to an "Exceptional Circumstance" and is therefore not justified. Overall, exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker	The Policy should be deleted.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Council has set out its specific responses relating to the sites HGA1 and HGA2 in Springwell Village (the free-standing and self-defined nature of the village) in Compliance Statement (see Policy SS2 and also Safeguarded Land Policy SS3)	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											boundary being created than currently exists. Specifically, in relation to the safeguarded land at Springwell Village, the impact will affect the free-standing and self-defined nature of the village.	boundary being created than currently exists. Specifically, in relation to the safeguarded land at Springwell Village, the impact will affect the free-standing and self-defined nature of the village.			
Paul	Dixon	Highways England	PD4842	Policy	SS3	Object			Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.		Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning	

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															<u>management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</u>
Michael	O'Brien	Homes England	PD4341	Policy	SS3	Support						Homes England are supportive of the identification of the Land to the East of Washington as being appropriate to be released from the Green Belt. Homes England also support the identification that the site is suitable for the future delivery of a new sustainable community. Homes England consider the site is capable of being delivered, either in full or in part within the Plan period and would support any modification to the Plan which would see the site being allocated for development in the Plan.	Safeguarded land east of Washington being allocated for development.	Support noted. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, and considers there to be a justified case for safeguarding two areas of land (further details are in the Compliance Statement, Policy SS3). When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer term development needs. Safeguarded Land is considered necessary for a number of reasons. Firstly, it provides a degree of permanence to the Green Belt boundaries put in place by the Plan and ensures that future further reviews of the Green Belt will not be needed at the end of the Plan period. Secondly, it provides flexibility and allows for a Plan review if the council cannot demonstrate a five year land supply. During a Plan review, the reassessment of Safeguarded Land will involve determining whether in the prevailing circumstances there is a case for releasing some or all of the land for development, or whether it should be maintained as Safeguarded Land until the next review of the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD4794	Policy	SS3	Object			It is considered that the CSDP could go further and release more land from Green Belt as safeguarded land-particularly in the North Sunderland sub-area to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period. There is an opportunity to release additional land from the Green Belt at HGA7 consistent with the proposed allocation in the Draft CSDP.		It is considered that the CSDP could go further and release more land from Green Belt as safeguarded land-particularly in the North Sunderland sub-area to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period. There is an opportunity to release additional land from the Green Belt at HGA7 consistent with the proposed allocation in the Draft CSDP.		It is considered that the CSDP could go further and release more land from Green Belt as safeguarded land - particularly in the North Sunderland sub-area to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period.	Hellens propose a larger site (site 416) that includes additional land for development to the south, increasing the development yield from 110 to around 190 homes. The reasons for not supporting this additional land are included in the response to policy SS2 (site HGA1). Most significantly, site 416 was considered to perform strongly against Green Belt purpose and was therefore discounted (fundamental impact in terms of urban sprawl and countryside encroachment). Additionally, this site encroached too far into the wildlife and Green Infrastructure corridor of the River Wear (to within 50m), and was considered to have additional impacts in relation to priority species and protected habitat, and in terms of its impact to the landscape character and key views.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD4872	Policy	SS3	Support with mods						It is considered that the CSDP could go further and release more land from Green Belt as safeguarded land-particularly in the South Sunderland sub-area to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period. There is an opportunity to release additional land from the Green Belt at Middle Herrington and Hastings Hill.	It is considered that the CSDP could release additional land from the Green Belt at Middle Herrington and Hastings Hill.	The site is not supported in light of both the impact to Green Belt purpose and the results of the Green Belt Boundary review. There remains a moderate overall adverse impact to Green Belt purpose in terms of checking unrestricted sprawl and in safeguarding countryside from encroachment (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 147, 169 and 171). This area provides significant support to the Green Belt gap between Houghton and Sunderland, most critically between the area between West Herrington and Middle Herrington. The Green Belt Boundary Review (p35-36) also recommends that there should be no change to the Green Belt boundary, stating that "The existing boundary on the western edge of Grindon, south to Thorney Close, running south following the built-up area at Middle Herrington and bounding	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														West Park - provides a logical and defensible boundary and there is no justification for making strategic amendments to this part of Sunderland's Green Belt boundary in our assessment. There are further significant issues that affect deliverability of the 3 sites put forward, including the immediate impact to 2 Scheduled Ancient Monuments, suitable access into the sites, impact to a SSSI, impact in parts to flooding, to historic ridge and furrow and to exposure with the A19.	
Caroline	Strugnell	Bellway Homes Ltd	PD1921	Policy	SS3	Object		Level of growth planned in Washington is not sufficient to accommodate potential uplift in population from strategies in Plan such as IAMP. Would like site at East House Farm to be identified as safeguarded land to ensure appropriate supply of housing land to meet economic growth. Site is partly located in South Tyneside and similar representations will be made to their plan. Green Belt Assessment is flawed as does not consider wider site (including land in South Tyneside), does not take into account proposed safeguarded land to south, IAMP or proposed housing site to west or benefits of sustainable development. Site has been discounted from SHLAA for reasons which can be addressed through good design, therefore assessment is flawed.					Identify land at East House Farm as safeguarded land.	This land area is referred to in the Green Belt Assessment Stage 1 Updated and Stage 2 as Field parcels NI1 and NI2 (see pages 60-62). Both of these land parcels were identified as providing fundamental Green Belt purpose (in terms of urban sprawl and countryside encroachment) and as a result were not taken forward to Stage 2 and is not supported. In addition, it is worth noting that much of the land is affected by Flood Zone 3 (Category 1 designation). In green infrastructure and wildlife corridor terms, the site provides a key corridor junction, west-east along the River Doh, and north-south joining a number of protected wildlife sites together. The site also includes protected habitat and is known to contain priority and protected species. In light of this, the site is not considered suitable as safeguarded land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5014	Policy	SS3	Object		Object to Policy SS3 on the grounds that once the Green Belt protection is removed development of a considerable number of houses is likely. This will further affect the setting and character of Springwell Village impact on road infrastructure. It will conflict with the aims of Policy SP1 as a defensible boundary could not be formed and adequate infrastructure could not be provided.	Object to Policy SS3 on the grounds that once the Green Belt protection is removed development of a considerable number of houses is likely. This will further affect the setting and character of Springwell Village impact on road infrastructure. It will conflict with the aims of Policy SP1 as a defensible boundary could not be formed and adequate infrastructure could not be provided.			Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation,	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														<p>which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for all HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Assessment recommends that these sites are deliverable and will not have an unacceptable impact on the local or strategic network. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which includes contributions for highways and public transport amongst other infrastructure.</p> <p>Further justification can be found in the above evidence base documents and relevant Compliance Statement. The Council considers the Policy to be sound.</p>	
Clive	Milner		PD231	Policy	SS3	Object						Supports the overall conclusion of the Peter Brett Associates assessment of Green Belt which supports the release of Mr Milner's land (land parcels NI10, NI11 and NI15), partly covered by policy SS3. However, objects on the grounds that the land should be released for housing in the plan period as deliverability can be	1) Further consideration needs to be given to releasing the land owned by Mr Milner for housing in the life of this plan rather than following a review of the CSDP. The housing sites identified in the Washington area, that will result in Green Belt release, are potentially not deliverable. This site is deliverable. 2) The land to the south of	The 2018 Green Belt Boundary Assessment concludes that the boundary proposed provides a more logical and defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarding by the Council in the 2018 CSDP. Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27).The Council would reiterate that the policy will restrict development of the site in the Plan Period. As paragraph 4.46 states, the site is removed from the Green Belt in order to ensure that a strong and durable boundary can be established, and that the safeguarded land can	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												demonstrated. Debates the deliverability of HGA1 and its associated access route from Mount Lane as a means of justifying Mr Milner's site for housing in the plan period. Based on previous accepted Member agreement at a planning committee in relation to planning application (15/00671/HYE), it is proposed that land to the south of the link road be removed from the Green Belt as part of the CSDP process, which is not addressed in the Peter Brett Associates report. In addition all underlying ordnance survey bases should be updated to reflect the current situation on the ground in relation to the inclusion of the new link road, completed in 2017.	the link road, included in the safeguarded land, needs to be released from the Green Belt now. Previous decisions taken by Members demonstrate that this land no longer offers a significant contribution to the five purposes of the Green Belt.	only be released for development through a review of the Plan, in accordance with the NPPF.	
S	Gregson		PD1668	Figure	22	Object		Objects to Figure 22 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Objects to Figure 22 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.		Objects to Figure 22 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Objects to Figure 22 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Safeguard additional 176 hectares of land at Burdon.	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 112-114 that the proposed development land (which equates to land parcels BU1, BU2, BU3, BU5, BU6 and BU7) would have a fundamental impact on Green Belt purpose (namely in terms of urban sprawl and countryside encroachment). This land is also physically detached from the urban area and lies beyond the South Sunderland Growth Area. The site is therefore unsustainable and isolated, and is essential to be retained as Green Belt. In light of this, the site is not considered suitable as safeguarded land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
S	Gregson		PD1657	Policy	SS3	Object		Objects to Policy SS3 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Objects to Policy SS3 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.		Objects to Policy SS3 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Objects to Policy SS3 which should be more flexible and identify further sites to meet needs arising beyond the plan period.176 hectares of land at Burdon should be safeguarded.	Safeguard additional 176 hectares of land at Burdon.	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 112-114 that the proposed development land (which equates to land parcels BU1, BU2, BU3, BU5, BU6 and BU7) would have a fundamental impact on Green Belt purpose (namely in terms of urban sprawl and countryside encroachment). This land is also physically detached from the urban area and lies beyond the South Sunderland Growth Area. The site is therefore unsustainable and isolated, and is essential to be retained as Green Belt. In light of this, the site is not considered suitable as safeguarded land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Treadwell		PD257	Policy	SS3	Object						Removal of land to south of Springwell to be reclassified as safeguarded land on basis of a more robust boundary is unjustified. Disagree with the findings of the Review of Sunderland Green Belt paper, which conflicts with the earlier Green Belt Assessment with regard to the durability of Green Belt boundaries.	Do not safeguard land to the south of Springwell.	The 2018 Green Belt Boundary Assessment concludes that the boundary proposed provides a more logical and defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarding by the Council in the 2018 CSDP. Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27).The Council would reiterate that the policy will restrict development of the site in the Plan Period. As paragraph 4.46 states, the site is removed from the Green Belt in order to ensure that a strong and durable boundary can be established, and that the safeguarded land can only be released for development through a review of the Plan, in accordance with the NPPF.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sam	Treadwell		PD252	Policy	SS3	Object						Removal of land to south of Springwell to be reclassified as safeguarded land on basis of a more robust boundary is unjustified. Disagree	Do not safeguard land to the south of Springwell.	The 2018 Green Belt Boundary Assessment concludes that the boundary proposed provides a more logical and defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarding by the Council in the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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												with the findings of the Review of Sunderland Green Belt paper, which conflicts with the earlier Green Belt Assessment with regard to the durability of Green Belt boundaries.		2018 CSDP. Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27).The Council would reiterate that the policy will restrict development of the site in the Plan Period. As paragraph 4.46 states, the site is removed from the Green Belt in order to ensure that a strong and durable boundary can be established, and that the safeguarded land can only be released for development through a review of the Plan, in accordance with the NPPF.	the Plan. Therefore no modifications are proposed.
Neil	Cole	South Tyneside Council	PD4385	Policy	SS3	Support				South Tyneside Council note Policy SS3 and would welcome the opportunity to discuss how its potential long term development would continue to maintain the integrity of the remaining Green Belt, how the Inter-District GI Corridor would be retained and enhanced and understand how impacts on the road network and local ecology would be managed and minimised.			No modification proposed	The Council will continue to work with South Tyneside as part of the Duty to Cooperate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Alan	Hutchinson		PD2025	Policy	SS3	Object		The approach to safeguarding land is supported, but further land should be safeguarded- land at Glebe House Farm should be safeguarded. Policy SS3 is not effective as it is not deliverable and will impact on the deliverability of the overall strategy of the plan.	The approach to safeguarding land is supported, but further land should be safeguarded- land at Glebe House Farm should be safeguarded. Policy SS3 is not effective as it is not deliverable and will impact on the deliverability of the overall strategy of the plan.		The approach to safeguarding land is supported, but further land should be safeguarded- land at Glebe House Farm should be safeguarded. Policy SS3 is not effective as it is not deliverable and will impact on the deliverability of the overall strategy of the plan.	The approach to safeguarding land is supported, but further land should be safeguarded- land at Glebe House Farm should be safeguarded. Policy SS3 is not effective as it is not deliverable and will impact on the deliverability of the overall strategy of the plan.	If land at Glebe House Farm is not reinstated as a housing growth area, it should be allocated as safeguarded land to deliver approximately 55 new homes.	The Council no longer supports the site- the reasons are given in the 2018 Green Belt Assessment Addendum (p3-4). This states that the potential amenity impacts from adjacent businesses on Pattinson Industrial Estate were deemed to be fundamental to the site's suitability for residential development and would affect business viability. In particular, the viability of existing businesses may be compromised if complaints are received in the future relating to operational noise, dust and traffic, resulting from residential property being located on this site. One business in question made representations to the Draft Plan which indicated that they were planning to expand their operations (including 24 hour operation), and were concerned that this future expansion would not be feasible with residential development in such close proximity. This business already has more than 100 vehicle movements per day (many HGV's) and deals with wood recycling which is controlled under a waste management licence. Pattinson South Industrial Estate, which is adjacent to the site, is a Primary Employment Area, and together with the impacts identified through consultation, it was concluded that the site should no longer be supported or be considered suitable as safeguarded land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey		Taylor Wimpey	PD3972	Policy	SS3	Object			The Council needs to ensure there is sufficient land at appropriate locations to meet development needs beyond 2033. There is limited land available for development at Houghton-le-Spring and the site east of Seaham Road should be released from the Green Belt to allow for plan-led growth in this area. This would reduce the likelihood of further Green Belt amendments during the next Plan review. The release of this site would use physical features that are readily recognisable and likely to be permanent.		The Council needs to ensure there is sufficient land at appropriate locations to meet development needs beyond 2033. There is limited land available for development at Houghton-le-Spring and the site east of Seaham Road should be released from the Green Belt to allow for plan-led growth in this area. This would reduce the likelihood of further Green Belt amendments during the next Plan review. The release of this site would use physical features that are readily recognisable and likely to be permanent.		It is considered that the CSDP should release Green Belt land around Houghton-le-Spring to allow for sustainable growth to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period.	The reasons for not supporting this land are as follows. The Green Belt Assessment Stage 1 Updated and Stage 2 report confirms (p107) that the impacts to Green Belt purpose are moderate (particularly in relation to urban sprawl and countryside encroachment). In addition, the Green Belt Boundary Assessment (p38-39) confirms that the area performs an important role in preventing Sunderland to the east from merging with Houghton-le-Spring to the west and supports major green infrastructure corridors. It concludes that there is no basis to make any strategic boundary changes to this part of Sunderland's Green Belt. More specifically, Seaham Road provides a strong, defensible and well-defined boundary, and supports a logical eastern boundary to the Houghton-Hetton built-up area. Furthermore, this Green Belt is identified in the Sunderland Landscape Character Assessment to be of higher landscape value that should be protected, and forms an	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														important part of a district-wide wildlife and Green Infrastructure corridor that links to the River Wear to the north, and southwards into County Durham. The site is also assessed at Stage 3 Green Belt Site Selection Report (p83) which confirms that the site is not suitable due to the reasons outlined above.	
James	Hudson	Environment Agency	PD208	Policy	SS3	Object						The EA have concerns regarding the Safeguarded land policy, particularly the risk of flood from the River Don. The EA do not recommend that this site is brought forward or safeguarded for more vulnerable development such as housing. The EA recommend that in accordance with the NPPF that the development should be located in a lower flood risk zone. The EA also have concerns regarding amenity impacts and the impact development could have on permitted facilities. The EA do not find the Plan to be unsound if the site was to come forward in the Plan period the EA may wish to change their position as the site is not supported by Sequential and Exception Tests.	No proposed modifications.	The Council considers this policy to be sound as the land is Safeguarded. This site could only come forward for development when it can be demonstrated it is needed and this would only occur through a Local Plan review or new Local Plan. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k). The Council would work with the EA to prepare sequential and exceptions test and ensure that development is located in areas of low flood risk.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5652	Policy	SS3	Object			The supporting text to Policy SS3, at paragraph 4.45, states that safeguarded land is considered necessary for a number of reasons including to provide a degree of permanence to the Green Belt and also to provide flexibility. The consultee states that the policy should go further and release more land from Green Belt. The full 18 hectare site put forward for HGA4 (if not supported as an allocation) should be safeguarded. This would provide plan flexibility, especially if a five year supply could not be demonstrated. The safeguarded land at East Springwell should be part of the HGA2 allocation, rather than safeguarded.		The supporting text to Policy SS3, at paragraph 4.45, states that safeguarded land is considered necessary for a number of reasons including to provide a degree of permanence to the Green Belt and also to provide flexibility. The consultee states that the policy should go further and release more land from Green Belt. The full 18 hectare site put forward for HGA4 (if not supported as an allocation) should be safeguarded. This would provide plan flexibility, especially if a five year supply could not be demonstrated. The safeguarded land at East Springwell should be part of the HGA2 allocation, rather than safeguarded.		If the Council does not support the additional 7 hectares of land in HGA4, this land should be safeguarded, in order to reduce the likelihood of further Green Belt amendments during the next Plan review/plan period.	Regarding the additional land at Usworth Hall (HGA4), the Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 152 and 155 that, in the Council's opinion, the impact of this additional development land has a fundamental impact on the Green Belt. Of particular concern is the impact to the strategic gap between Washington and Gateshead (Follingsby), which would be reduced from its present gap of 1200m to as little as 360m (once this development and also Follingsby South were complete). Therefore the Council do not consider it appropriate to safeguard land at HGA4. In regards to HGA2, the Council cannot justify allocating this site in the Plan period.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5308	Policy	SS4	Object		Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Incorporate a flexible approach to housing deliver and increase the housing requirement.	The Council considers that the level of detail is appropriate and the approach is sound, enabling in particular that a number of sensitive site issues are identified and addressed, and specifically addressed at the planning application stage. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy) and for North Sunderland (see Policy SP4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Jill, Adamson, PD7438 Steve, Adamson, PD7437 Florence, Alcock, PD8054 Olwyn, Alder, PD8032 Florence, Allen, PD7683 Lucy, Allison, PD7293 Pauline, Allun, PD8141 Christine, Appleton, PD7439 Neil, Armstrong, PD7464 Suzanne, Armstrong, PD7465 Donna, Armstrong, PD7660 Lisa, Arthur, PD7469 Vera, Atkinson, PD7470 Alan, Baker, PD7374 Jean, Baster, PD7508 Susan, Bell, PD7485 Colin, Bell, PD7472 Vicky, Bennett, PD7486 Michelle, Berridge, PD7487 Paul, Berridge, PD7489 Stephanie, Berridge, PD7507 Richard, Berridge, PD7490 Patricia, Bewick, PD7510 Geoff, Blight, PD8000 Peter, Bond, PD7506 Trevor, Brewis, PD7296 Ann, Broomfield, PD7505 Gordon, Brown, PD7447 Joanna, Brown, PD7528 Cheralyn, Brown, PD7904 Margaret, Buckingham, PD7531 John, Buckingham, PD7655 Nicola, Buglass, PD7739 Christine, Burton, PD7533 Joe, Carter, PD7536 Lynn, Cave, PD7606 Kay, Clark, PD7375 Carole, Cleminson, PD7425 Bridget, Cockburn, PD7539 Philip, Cockburn (Snr), PD7556 Edith, Conley, PD7310, Vicki, Cook, PD7806, Leanne, Cowell, PD7599, Marjorie, Coxon, PD7557, Elaine, Cresswell, PD7635, Paul, Crompton, PD7560, Elizabeth, Cuddihy, PD8041, Martin, Cummings, PD7563, Eric, Curtis, PD7564, Lesley, Daley, PD7571, Ken, Davies, PD8049, Barbara, Davis, PD7572, Ian, Davison, PD7992, Claire, Deary, PD7372, Tracey, Dembry, PD7351, Steven, Dembry, PD7641, Marilyn, Ditchfield, PD7316, Danielle, Dixon, PD7990, Sharon, Donnigan, PD8045, Anne, Downs, PD7333, Kenneth, Drysdale, PD7597, Jemima, Drysdale, PD8088, Kevin, Drysdale, PD8091, Marsha, Drysdale, PD7322, Jean, Drysdale, PD7321, Jason, Duddin, PD7336, Janice, Duncan, PD7404, Les, Eccles, PD7352, John, Farrer, PD7460, Susan, Farrer, PD7747, Alan, Fenwick, PD7999, Jason, Fielder, PD7573, Enid, Finley, PD7354, Pauline, Fitzsimon, PD7364, Lorna, Flannigan, PD7575, Rebecca, Forrest, PD7577, Jill, Forster, PD7323, Brenda, Foster, PD7729, Joanne, Gair, PD7451, Juliet, Gaughan, PD7723, Gill, Gibson, PD7603, Linda, Gibson, PD7601, John, Gibson, PD7602, Gemma, Gibson, PD7608, Andrew, Gibson, PD7614, Steven, Goldsmith, PD7450, Terry, Goldsmith, PD7994, April, Gooch, PD7342, Ashleigh, Goodwin, PD7516, Robert, Goodwin, PD7629, Julie, Grant, PD7576, Julie, Green, PD7313, Sarah, Green, PD7452, Raymond, Green, PD7504, David, Halls, PD7361, Robert, Hampton, PD7377, Susan, Hardy, PD7330, Vivien, Hardy, PD7334, Nicholas, Hardy, PD7335, David, Harewood, PD7359, Mark, Harvey, PD7676, Karen, Harvey, PD7784,				Policy	SP4		The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy			The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	Site HGA7 should be removed from the Plan and Policies Map	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in the Compliance Statement. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Jack, Harvey, PD7792, Penny, Hayton, PD7391, Colleen, Hedley, PD7628, Dean, Henson, PD7525, Jane, Hepworth, PD7356, Lesley, Hickman, PD7874, Katie, Hickman, PD7880, Benjamin, Higgins, PD7631, Claire, Hoggeth, PD7632, Bethany, Horn, PD7355, Gayle, Houghton, PD7360, Margaret, Hudson, PD7634, Daniel, Hudson, PD8510, Azia, Huggins, PD7829, Ronnie, Huggins, PD7840, Jessica, Hunter, PD7643, Bernard, Huscroft, PD7298, Lorraine, Irwin, PD7767, Maureen, Jobling, PD7644, Sandra, Johnson, PD7332, Anne, Jones, PD7407, Louise, Jones, PD7411, Lucy, Jones, PD7435, Gabriele, Jones, PD7646, Anne-Marie, Kabongo, PD7647, Kadria, Kassim, PD7651, Chris, Kelly, PD7846, David, Kibble, PD8065, Julie, Kibble, PD8067, Dave, King, PD7649, Val, King, PD7664, Olivia, Knowles, PD7666, Ena, Lang, PD8003, Barry, Laydon, PD7338, Jackie, Laydon, PD7441, Alan, Liddle, PD7314, Margaret, Liddle, PD7667, Phillip, Lloyd Robertson, PD7988, W Anthony, Long, PD7668, Jean, Lucas, PD7669, Kathy, Lyttle, PD7671, Catherine, Malloy, PD7689, David, Markham, PD7350, Marylyn, McCluskey, PD7694, Gillian, McCrudden, PD7696, Eileen, McDonald, PD7698, June, McDonough, PD8036, Moira, McGinley, PD7687, William, McGinley, PD7719, Marc, McKinley, PD7717, Urszula, McLean, PD7692, Ciaran, McNally, PD7358, Lee, McVittie, PD7720, Gordon, Merry, PD7400, Janet, Merry, PD7558, Diane, Miller, PD7501, Edward, Miller, PD7484, Christine, Miller, PD7595, Robin, Miller, PD7590, Anne, Millward, PD7381, Julie, Milner, PD7815, Saeid, Mohammadi, PD7440, Nora, Morris, PD7721, Emma, Murray, PD7722, Astride, Ntumba, PD7724, Victoria, Odumade, PD7734, Pauline, O'Wellen, PD7673, Ann, Owen, PD7545, Jean, Oxberry, PD7735, Deborah, Paramos, PD8013, Ruth, Patterson, PD7324, Declon, Pattinson, PD7794, Karen, Pattison, PD7380, Jamie, Peer, PD7742, Debbie, Peer, PD7737, Gerry, Pollock, PD7403, Tracey, Potter, PD7914, Dean, Prater, PD7348, Rachel, Prescott, PD7860, B, Pringle, PD7743, Sarah, Purdy, PD7297, Tim, Purvis, PD7382, Jordan, Purvis, PD7353, Lilian, Reid, PD7991, Ellie, Rice, PD7312, Darren, Rich, PD8059, Angelina, Richardson, PD7762, Emme, Richardson, PD7421, Louise, Richardson, PD7550, Emily, Richardson, PD7745, Glen, Richardson, PD7761, Paula, Richardson, PD7765, Maria, Robb, PD8014, Allan, Robe, PD7326, Angela, Roberts, PD7325, Lyndsey, Robertson, PD8023, David, Robinson, PD7307, Ann, Robinson, PD7311, Jaqueline, Robinson, PD7398, Kathleen, Robson, PD7449, Emma, Robson, PD7446, Susan, Rowe, PD7764,														

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<p>Jean, Rudd, PD7760, Damien, Sartid-Zadeh, PD7443, Christine, Scouler, PD7363, Irene, Scratcher, PD7691, Robert, Seaman, PD7320, Claire, Simpson, PD7759, Margaret, Smith, PD8031, Ian, Snape, PD8012, Ross, Snell, PD7775, Charlene, Spence, PD7448, Denise, Spence, PD7534, Robert, Stamp, PD7791, Jane, Steven, PD7785, Julie, Steven, PD7789, Jamie, Storey, PD7362, Lynn, Straughan, PD7385, Edmund, Surtees, PD7396, Logan, Surtees, PD7731, David, Surtees, PD7788, Dane, Surtees, PD7821, Kimberley, Surtees, PD7787, Hazel, Surtees, PD7868, Colin, Swinhoe, PD7477, Margaret, Swinhoe, PD7474, Rebecca, Taylor, PD7294, Malcolm, Templeton, PD7346, Lisa, Todd, PD7782, Robert, Tully, PD7378, Angela, Turner, PD7566, Laura, Umpleby, PD7568, Ben, Waites, PD657, Charlotte, Waites, PD7700, B, Wake, PD7811, Lisa, Walker, PD7813, James, Wallace, PD7810, Ann, Wallace, PD8018, Paul, Weites, PD7809, Robert, Welsh, PD7457, Sarah Louise, Wheat, PD7807, Emily, Whitmore, PD7383, David, Whitmore, PD8030, Stephen, Whitmore, PD7570, Helen, Whitmore, PD7825, Jackie, Whitmore, PD7827, Linda, Whitmore, PD8002, Sarah, Whitmore, PD8001, Sharon, Wildgoose, PD7910, Michelle, Williams, PD7430, Karen, Wilson, PD7308, Donna, Wilson, PD7305, Robert, Wilson, PD7309, Pauline, Wilson, PD7989, Paul, Wilson, PD8048, Nick, Wilson, PD8072, Joyce, Wilson, PD8077, Denny, Wilson, PD8192, Karen, Winter, PD7828, Erika, Wood, PD7894, Jo-Ellen, Worrall, PD7830, Kathryn, Worrall, PD7832,</p>														
Mary P	Carruthers	Pawz for thought	PD274	Policy	SP4	Object	<p>Considers the policy not to be justified as the evidence base used to inform the removal of the site from the Green Belt is not credible or robust, with particular reference made to creating new defensible green belt boundaries. There appears to be no confirmation or clarification as to the exact proposed green belt boundary the council is looking to adopt. Concerns over the order that the evidence was produced, the credibility of the evidence base and conclusions changing. Questions how this site will cause least harm to the greenbelt. Considers the evidence base in relation to sustainable location to be weak and unjustified. Considers that the removal of this site would result in a break (which is needed) in the connectivity of the</p>			<p>Consider the policy not to be consistent with National Policy due to the evidence base being weak and not robust. Development will create a break in the connectivity of the strategic wildlife corridor.</p>	<p>Considers the policy not to be justified as the evidence base used to inform the removal of the site from the Green Belt is not credible or robust, with particular reference made to creating new defensible green belt boundaries. There appears to be no confirmation or clarification as to the exact proposed green belt boundary the council is looking to adopt. Concerns over the order that the evidence was produced, the credibility of the evidence base and conclusions changing. Questions how this site will cause least harm to the greenbelt. Considers the evidence base in relation to sustainable location to be weak and unjustified. Considers that the removal of this site would result in a break (which is needed) in the connectivity of the</p>	<p>Deletion of site HGA7 from policy SS4. Revision of policies map to indicate site HGA7 will remain in Green Belt.</p>	<p>The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland). Specific detail regarding site HGA7 is provided for Policy SS4 North Sunderland Housing Growth Areas. Regarding this justification, the Council states that the Green belt Reviews regard the site as having a moderate impact on Green Belt purpose. The 2018 Green Belt Boundary Assessment recommended that the southern boundary follows the existing treeline which runs in a roughly south-easterly direction from the adjacent roundabout, and would form a more logical boundary than that proposed in the Draft CSDP. Ferryboat Lane provides a robust boundary (see pages 27-29). As a result of the boundary recommendation, HGA7 has been revised (and is referred to in the SHLAA as site 416B). Ground conditions, physical constraints, hydrology and access appear to be suitable and feasible and there is no direct impact to Category 1 constraints. The site proposed is smaller than that put forward by the developer, Hellens, in order to appropriately mitigate impacts and minimise encroachment into the wildlife and Green Infrastructure corridor of the River Wear, to minimise impact to priority species and protected habitat, and minimise impact to the landscape character and key views. The impact of the site</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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							<p>strategic wildlife corridor and the impacts of this have not been assessed. Removal of the field would be detrimental to the diversity of habitats and the priority species it supports. The provision of greenspace within HGA7 seems inadequate. Concerns over lack of buffer zones and loss of trees. Questions how you could mitigate for HRA purposes and the natural swale. Questions over the Green Infrastructure Review Feb 2018 and the fact that the site had already been removed from the Green Belt. Questions consultation and whether the process is open and transparent. Questions how propose to mitigate against noise from A19/A1231 and suggest that air pollution should be considered. Questions what land is to be utilised for widening Ferryboat lane. Questions what the necessary highway mitigation would be and that the creation of a new junction so close to the A19/A1231 roundabout appears to be inconsistent with the council's own policies. Questions the need for additional housing and what evidence this is based upon as well as how much land is actually being taken out of the green belt through this plan. Questions the overall regeneration of the city and use of brownfield sites.</p>				<p>strategic wildlife corridor and the impacts of this have not been assessed. Removal of the field would be detrimental to the diversity of habitats and the priority species it supports. The provision of greenspace within HGA7 seems inadequate. Concerns over lack of buffer zones and loss of trees. Questions how you could mitigate for HRA purposes and the natural swale. Questions over the Green Infrastructure Review Feb 2018 and the fact that the site had already been removed from the Green Belt. Questions consultation and whether the process is open and transparent. Questions how propose to mitigate against noise from A19/A1231 and suggest that air pollution should be considered. Questions what land is to be utilised for widening Ferryboat lane. Questions what the necessary highway mitigation would be and that the creation of a new junction so close to the A19/A1231 roundabout appears to be inconsistent with the council's own policies. Questions the need for additional housing and what evidence this is based upon as well as how much land is actually being taken out of the green belt through this plan. Questions the overall regeneration of the city and use of brownfield sites.</p>			<p>to the wildlife and green infrastructure corridor is considered to be moderate, although its impact must be considered in line with the existence of development that separate the site from the River Wear and associated protected habitat. The impact can be minimised with sensitive design and boundary treatment, particularly along the southern edge of the site. As an area of higher landscape value, Policy SS4 requires the development to achieve a high architectural quality, particularly to protect long distance views throughout the development towards Penshaw Monument and along the River Wear corridor. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. There are no direct impacts to protected wildlife sites on site, and Hellen's has provided an Ecology statement identifying that the impact on protected and priority species is low.</p>	
Mary P	Carruthers	Pawz for thought	PD275	Policy	SS4	Object	<p>Considers the policy not to be justified as the evidence base used to inform the removal of the site from the Green Belt is not credible or robust, with particular reference made to creating new defensible green belt boundaries. There appears to be no confirmation or clarification as to the exact proposed green belt boundary the council is looking to adopt. Concerns over the order that the evidence was produced, the credibility of the evidence base and conclusions changing. Questions how this site will cause least harm to the greenbelt. Considers the evidence base in relation to sustainable location to be weak and</p>			<p>Consider the policy not to be consistent with National Policy due to the evidence base being weak and not robust. Development will create a break in the connectivity of the strategic wildlife corridor.</p>	<p>Considers the policy not to be justified as the evidence base used to inform the removal of the site from the Green Belt is not credible or robust, with particular reference made to creating new defensible green belt boundaries. There appears to be no confirmation or clarification as to the exact proposed green belt boundary the council is looking to adopt. Concerns over the order that the evidence was produced, the credibility of the evidence base and conclusions changing. Questions how this site will cause least harm to the greenbelt. Considers the evidence base in relation to sustainable location to be weak and</p>	<p>Deletion of site HGA7 from policy SS4. Revision of policies map to indicate site HGA7 will remain in Green Belt.</p>	<p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. More specifically, in terms of biodiversity, there are no direct impacts to protected wildlife sites on site, and an Ecology statement identifying that the impact on protected and priority species is low. Nevertheless, sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>	

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								<p>unjustified. Considers that the removal of this site would result in a break (which is needed) in the connectivity of the strategic wildlife corridor and the impacts of this have not been assessed. Removal of the field would be detrimental to the diversity of habitats and the priority species it supports. The provision of greenspace within HGA7 seems inadequate. Concerns over lack of buffer zones and loss of trees. Questions how you could mitigate for HRA purposes and the natural swale. Questions over the Green Infrastructure Review Feb 2018 and the fact that the site had already been removed from the Green Belt. Questions consultation and whether the process is open and transparent. Questions how propose to mitigate against noise from A19/A1231 and suggest that air pollution should be considered. Questions what land is to be utilised for widening Ferryboat lane. Questions what the necessary highway mitigation would be and that the creation of a new junction so close to the A19/A1231 roundabout appears to be inconsistent with the council's own policies. Questions the need for additional housing and what evidence this is based upon as well as how much land is actually being taken out of the green belt through this plan. Questions the overall regeneration of the city and use of brownfield sites.</p>				<p>unjustified. Considers that the removal of this site would result in a break (which is needed) in the connectivity of the strategic wildlife corridor and the impacts of this have not been assessed. Removal of the field would be detrimental to the diversity of habitats and the priority species it supports. The provision of greenspace within HGA7 seems inadequate. Concerns over lack of buffer zones and loss of trees. Questions how you could mitigate for HRA purposes and the natural swale. Questions over the Green Infrastructure Review Feb 2018 and the fact that the site had already been removed from the Green Belt. Questions consultation and whether the process is open and transparent. Questions how propose to mitigate against noise from A19/A1231 and suggest that air pollution should be considered. Questions what land is to be utilised for widening Ferryboat lane. Questions what the necessary highway mitigation would be and that the creation of a new junction so close to the A19/A1231 roundabout appears to be inconsistent with the council's own policies. Questions the need for additional housing and what evidence this is based upon as well as how much land is actually being taken out of the green belt through this plan. Questions the overall regeneration of the city and use of brownfield sites.</p>			<p>biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further information relating to the site is included in the Compliance Statement (see Policy SP4 North Sunderland, and Policy SS4 North Sunderland Housing Growth Areas, in relation to site HGA7).</p>	
Doris	MacKnight	Sunderland City Council	PD411	Policy	SS4	Object						<p>Policy SS4, HGA7 not justified. Site has no access except for a small road. The number of workers/plant machinery would disturb and erode the flora, fauna and wildlife of the surrounding area. Felling of trees would disturb the nesting habitat of the owls, birds and bats.</p>	<p>No modification proposed.</p>	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>	

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object/Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
														and so considered a suitable HGA site. Previously, the SHLAA has indicated that the site is not suitable for development, based on the fact that exceptional circumstances did not exist to justify development within the Green Belt. Numerous other constraints are referred to in the SHLAA and these have been addressed within the CSDP Policy and the accompanying Development Framework. More specifically, in terms of biodiversity, there are no direct impacts to protected wildlife sites on site, and an Ecology statement identifying that the impact on protected and priority species is low. Nevertheless, sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	
Denny	Wilson		PD5503	Policy	SS4	Object						There are no exceptional circumstances to release site HGA7 from the Green Belt. The SHLAA discounted the site (416) on the grounds that it was not suitable for development as it was Green Belt and had Category 1 and 2 constraints. The SHLAA concluded that development of the site would have adverse effects on Local, National and international ecological site, priority species, wildlife corridors and contrary to local plan regeneration. The site would result in Urban Sprawl with ecological and environmental ramifications. There are Otter living nearby and Deer. The SHLAA site was subdivide by the Green Belt Assessment into HY1 and HY2. The Council demonstrated very special circumstances for the release of HY2 and then got Planning experts to justify very Exceptional Circumstances to justify land from the Green Belt. However,	No modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Previously, the SHLAA has indicated that the site is not suitable for development, based on the fact that exceptional circumstances did not exist to justify development within the Green Belt. Numerous other constraints are referred to in the SHLAA and these have been addressed within the CSDP Policy and the accompanying Development Framework. More specifically, in terms of biodiversity, there are no direct impacts to protected wildlife sites on site, and an Ecology statement identifying that the impact on protected and priority species is low. Nevertheless, sensitive design	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											it is considered that there are no exceptional circumstances to justify the release of HGA7, as the site will result in urban sprawl, it's not safeguard the site from encroachment or assist in urban regeneration. The Council should take into consideration case law including Gallagher Homes V Solihull.		will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	
Steve, Adamson, PD7549 Jill, Adamson, PD7551 Florence, Alcock, PD8070 Olwyn, Alder, PD8050 Florence, Allen, PD7738 Lucy, Allison, PD7299 Pauline, Allun, PD8145 Christine, Appleton, PD7553 Neil, Armstrong, PD7500 Suzanne, Armstrong, PD7502 Donna, Armstrong, PD7702 Lisa, Arthur, PD7515 Vera, Atkinson, PD7517 Alan, Baker, PD7419 Jean, Baster, PD7637 Colin, Bell, PD7498 Susan, Bell, PD7640 Vicky, Bennett, PD7656 Paul, Berridge, PD7662 Stephanie, Berridge, PD7636 Michelle, Berridge, PD7657 Richard, Berridge, PD7663 Patricia, Bewick, PD7639 Geoff, Blight, PD8020 Peter, Bond, PD7618 Trevor, Brewis, PD7302 Ann, Broomfield, PD7616 Gordon, Brown, PD7523 Cheralyn, Brown, PD7930 Joanna, Brown, PD7591 Margaret, Buckingham, PD7604 John, Buckingham, PD7713 Nicola, Buglass, PD7773 Christine, Burton, PD7609 Joe, Carter, PD7611 Lynn, Cave, PD7661 Kay, Clark, PD7454 Carole, Cleminson, PD7483 Bridget, Cockburn, PD7612 Philip, Cockburn (Snr), PD7582 Edith, Conley, PD7337, Vicki, Cook, PD7861, Leanne, Cowell, PD7659, Marjorie, Coxon, PD7584, Elaine, Cresswell, PD7707, Paul, Crompton, PD7585, Elizabeth, Cuddihy, PD8076, Martin, Cummings, PD7587, Eric, Curtis, PD7589, Lesley, Daley, PD7751, Ken, Davies, PD8071, Barbara, Davis, PD7752, Ian, Davison, PD7998, Claire, Deary, PD7416, Steven, Dembry, PD7711, Tracey, Dembry, PD7368, Marilyn, Ditchfield, PD7340, Danielle, Dixon, PD8011, Sharon, Donnigan, PD8075, Anne, Downs, PD7399, Marsha, Drysdale, PD7344, Jean, Drysdale, PD7343, Jemima, Drysdale, PD8102, Kevin, Drysdale, PD8101,		Policy	SS4	Object		The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy			The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in Compliance Statement SP4. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Kenneth, Drysdale, PD7653, Jason, Duddin, PD7406, Janice, Duncan, PD7453, Les, Eccles, PD7370, John, Farrer, PD7518, Susan, Farrer, PD7777, Alan, Fenwick, PD8019, Jason, Fielder, PD7753, Enid, Finley, PD7461, Pauline, Fitzsimon, PD7497, Lorna, Flannigan, PD7755, Rebecca, Forrest, PD7756, Jill, Forster, PD7345, Brenda, Foster, PD7771, Joanne, Gair, PD7512, Juliet, Gaughan, PD7770, Gill, Gibson, PD7727, Linda, Gibson, PD7716, Gemma, Gibson, PD7748, John, Gibson, PD7725, Andrew, Gibson, PD7749, Steven, Goldsmith, PD7520, Terry, Goldsmith, PD8017, April, Gooch, PD7388, Ashleigh, Goodwin, PD7619, Robert, Goodwin, PD7685, Julie, Grant, PD7593, Julie, Green, PD7331, Sarah, Green, PD7519, Raymond, Green, PD7562, David, Halls, PD7493, Robert, Hampton, PD7455, Vivien, Hardy, PD7402, Susan, Hardy, PD7395, Nicholas, Hardy, PD7405, David, Harewood, PD7479, Mark, Harvey, PD7736, Jack, Harvey, PD7837, Karen, Harvey, PD7836, Penny, Hayton, PD7427, Colleen, Hedley, PD7705, Dean, Henson, PD7620, Jane, Hepworth, PD7463, Lesley, Hickman, PD7911, Katie, Hickman, PD7913, Benjamin, Higgins, PD7708, Claire, Hoggeth, PD7712, Bethany, Horn, PD7392, Gayle, Houghton, PD7480, Margaret, Hudson, PD7714, Daniel, Hudson, PD7715, Azia, Huggins, PD7869, Ronnie, Huggins, PD7871, Jessica, Hunter, PD7677, Bernard, Huscroft, PD7300, Lorraine, Irwin, PD7833, Maureen, Jobling, PD7678, Sandra, Johnson, PD7397, Anne, Jones, PD7468, Louise, Jones, PD7481, Lucy, Jones, PD7548, Gabriele, Jones, PD7679, Anne-Marie, Kabongo, PD7680, Kadria, Kassim, PD7684, Chris, Kelly, PD7902, David, Kibble, PD8094, Julie, Kibble, PD8093, Dave, King, PD7682, Val, King, PD7826, Olivia, Knowles, PD7842, Ena, Lang, PD8040, Philip, Laws, PD7295, Philip, Laws, PD7303, Barry, Laydon, PD7386, Jackie, Laydon, PD7509, Alan, Liddle, PD7339, Margaret, Liddle, PD7844, Phillip, Lloyd Robertson, PD8007, W Anthony, Long, PD7845, Jean, Lucas, PD7850, Kathy, Lyttle, PD7852, Catherine, Malloy, PD7817, David, Markham, PD7367, Marylyn, McCluskey, PD7820, Gillian, McCrudden, PD7822, Eileen, McDonald, PD7824, June, McDonough, PD8055, Moira, McGinley, PD7816, William, McGinley, PD7798, Marc, McKinley, PD7797, Urszula, McLean, PD7819, Ciaran, McNally, PD7478, Lee, McVittie, PD7800, Gordon, Merry, PD7431, Janet, Merry, PD7580, Diane, Miller, PD7561, Edward, Miller, PD7544, Christine, Miller, PD7652, Robin, Miller, PD7648, Anne, Millward, PD7459, Julie, Milner, PD7864, Saeid, Mohammadi, PD7554,														

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Nora, Morris, PD7801, Emma, Murray, PD7802, Astride, Ntumba, PD7803, Victoria, Odumade, PD7774, Pauline, O'Wellen, PD7732, Ann, Owen, PD7625, Jean, Oxberry, PD7776, Deborah, Paramos, PD8035, Ruth, Patterson, PD7347, Declon, Pattinson, PD7839, Karen, Pattison, PD7423, Jamie, Peer, PD7780, Debbie, Peer, PD7779, Gerry, Pollock, PD7433, Tracey, Potter, PD7932, Dean, Prater, PD7365, Rachel, Prescott, PD7905, B, Pringle, PD7783, Sarah, Purdy, PD7301, Tim, Purvis, PD7475, Jordan, Purvis, PD7371, Lilian, Reid, PD7996, Ellie, Rice, PD7329, Darren, Rich, PD8095, Emme, Richardson, PD7482, Louise, Richardson, PD7626, Emily, Richardson, PD7786, Glen, Richardson, PD7942, Angelina, Richardson, PD7944, Paula, Richardson, PD7946, Maria, Robb, PD8033, Allan, Robe, PD7357, Angela, Roberts, PD7349, Lyndsey, Robertson, PD8053, Ann, Robinson, PD7328, David, Robinson, PD7317, Jaqueline, Robinson, PD7429, Emma, Robson, PD7511, Kathleen, Robson, PD7522, Susan, Rowe, PD7945, Jean, Rudd, PD7940, Damien, Sartid-Zadeh, PD7555, Christine, Scouler, PD7495, Irene, Scratcher, PD7740, Robert, Seaman, PD7341, Claire, Simpson, PD7938, Margaret, Smith, PD8051, Ian, Snape, PD8037, Ross, Snell, PD7834, Charlene, Spence, PD7547, Denise, Spence, PD7623, Robert, Stamp, PD7936, Jane, Steven, PD7922, Julie, Steven, PD7928, Jamie, Storey, PD7413, Lynn, Straughan, PD7424, Logan, Surtees, PD7772, Edmund, Surtees, PD7428, Dane, Surtees, PD7867, Hazel, Surtees, PD7907, Kimberley, Surtees, PD7924, David, Surtees, PD7926, Margaret, Swinhoe, PD7541, Colin, Swinhoe, PD7542, Rebecca, Taylor, PD7304, Malcolm, Templeton, PD7379, Lisa, Todd, PD7919, Robert, Tully, PD7458, Angela, Turner, PD7583, Laura, Umpleby, PD7586, Ben, Waites, PD658, Charlotte, Waites, PD7744, B, Wake, PD7915, Lisa, Walker, PD7917, James, Wallace, PD7890, Ann, Wallace, PD8034, Paul, Weites, PD7889, Robert, Welsh, PD7513, Sarah Louise, Wheat, PD7887, Sarah, Whitmore, PD8021, Emily, Whitmore, PD7476, Stephen, Whitmore, PD7588, Helen, Whitmore, PD7854, Jackie, Whitmore, PD7878, Linda, Whitmore, PD8024, David, Whitmore, PD8052, Sharon, Wildgoose, PD7931, Michelle, Williams, PD7466, Denny, Wilson, PD8214, Donna, Wilson, PD7306, Karen, Wilson, PD7318, Robert, Wilson, PD7319, Pauline, Wilson, PD8010, Paul, Wilson, PD8074, Nick, Wilson, PD8092, Joyce, Wilson, PD8104, Karen, Winter, PD7881, Erika, Wood, PD7929, Kathryn, Worrall, PD7886, Jo-Ellen, Worrall, PD7882,																			
Phillip	Cockbur		PD811	Policy	SS4	Object		HGA7 causes major	HGA7 causes major		HGA7 causes major	HGA7 causes major	Remove HGA7 from	The Council has set out its spatial	The Council considers				

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	n		7				<p>harm to the Green Belt. Very limited contribution to overall housing need which does not outweigh significant Green Belt harm.HGA7 is also contrary to several other Plan policies and background papers.HGA7 is therefore not justified, ineffective and inconsistent with national policy on Green Belts, and as a result fundamentally unsound.</p>	<p>harm to the Green Belt. No exceptional circumstances because figures are based on very hopeful economic growth figures; contrary to national planning policy on Green Belt. Very limited contribution to overall housing need which does not outweigh significant Green Belt harm.HGA7 is also contrary to several other Plan policies and background papers.HGA7 is therefore not justified, ineffective and inconsistent with national policy on Green Belts, and as a result fundamentally unsound. Specifically to Policy SP4: This is not compliant to national policy. A deletion of this nature (HGA7) will jeopardise the long term future of the rest of this part of Green Belt. It reduces the width of the Green Belt between A1231 and River by 50%.The exceptional circumstances are not justified and fully evidenced, and the boundary proposed does not follow any recognisable or permanent feature. There is significant uncertainty with the OAN uplift. The other sites proposed could cover any shortfall without this small site also being used (which should be weighed against the considerable harm incurred in this area).The site is poorly located, separated from urban areas by a dual carriageway, and with poor access. It impacts on high landscape character, key views of the river, negative impacts on wildlife and GI corridor. This proposal conflicts against policies SP1, NE1, NE2, NE4, NE6, ST2, ST3 and Figure 40.</p>		<p>harm to the Green Belt. 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The 2018 Green Belt Boundary Assessment recommended that the southern boundary follows the existing treeline which runs in a roughly south-easterly direction from the adjacent roundabout, and would form a more logical boundary than that proposed in the CSDP 2017. This boundary would benefit from additional planting in certain locations where the existing treeline is thinner than elsewhere. Ferryboat Lane provides a robust boundary (see pages 27-29). As a result of the boundary recommendation, HGA7 has been revised (and is referred to in the SHLAA as site 416B). Ground conditions, physical constraints, hydrology and access appear to be suitable and feasible and there is no direct impact to Category 1 constraints. Overall scheme design will address specific requirements set out in HGA7. The site proposed is smaller than that put forward by the developer, Hellens, in order to appropriately mitigate impacts and minimise encroachment into the wildlife and Green Infrastructure corridor of the River Wear, to minimise impact to priority species and protected habitat, and minimise impact to the landscape character and key views. The impact of the site to the wildlife and green infrastructure corridor is considered to be moderate, although its impact must be considered in line with the existence of development that separate the site from the River Wear and associated protected habitat. The impact can be minimised with sensitive design and boundary treatment, particularly along the southern edge of the site. As an area of higher landscape value, Policy SS4 requires the development to achieve a high architectural quality, particularly to protect long distance views throughout the development towards Penshaw Monument and along the River Wear corridor. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. There is concern regarding the noise and vibration impacts from the adjacent A19 and A1231. Appropriate mitigation will be necessary in the form of landscape buffer zones along the north and west edges of the site, including increased tree buffering as necessary. There are no direct impacts to protected wildlife sites on site, and Hellens has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife</p>	<p>there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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													and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. The development can sympathetically support local architectural styles and materials. It is considered that the setting of the Grade II listed Shipwrights Public House is not impacted upon. By contrast, the larger site proposed by Hellens would encroach development upon the setting of the Public House. The developer, Hellens, has confirmed that the land is classed as Grade 3b agricultural land which is defined as being of moderate quality (Lichfields: Response to Consultation on Sunderland Core Strategy 2017, paragraph 3.15). Therefore using this land would not be contrary to the NPPF. The land is in private ownership, with access limited. A public footpath runs across the site which will have to be considered as the site comes forward. However, other cycle and walking routes associated with the River Wear corridor lie to the south of the site and are not affected. The site sits well away from Flood Zones 2 and 3, associated with the River Wear. The site is affected by surface water flooding along a natural swale along the site's western boundary- initial scheme design has considered how this can be treated through the use of greenspace and SUDS and provide easements for public sewers as necessary. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains.		
Phillip	Cockburn		PD8122	Policy	SP4	Object	HGA7 causes major harm to the Green Belt. Very limited contribution to overall housing need which does not outweigh significant Green Belt harm.HGA7 is also contrary to several other Plan policies and background papers.HGA7 is therefore not justified, ineffective and inconsistent with national policy on Green Belts, and as a result fundamentally unsound. Specifically to Policy SP4: This is not compliant to national policy. A deletion of this nature (HGA7) will jeopardise the long term future of the rest of this part of Green Belt. It reduces the width of the Green Belt between A1231 and River by 50%. The exceptional circumstances are not justified and fully evidenced, and the boundary proposed does not follow any recognisable or permanent feature. There is significant uncertainty with the OAN uplift. The site is poorly located, separated from urban areas by a dual	HGA7 causes major harm to the Green Belt. 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The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland). Specific detail regarding site HGA7 is provided for Policy SS4 North Sunderland Housing Growth Areas. Regarding this justification, the Council states that the Green belt Reviews regard the site as having a moderate impact on Green Belt purpose. The 2018 Green Belt Boundary Assessment recommended that the southern boundary follows the existing treeline which runs in a roughly south-easterly direction from the adjacent roundabout, and would form a more logical boundary than that proposed in the CSDP 2017. This boundary would benefit from additional planting in certain locations where the existing treeline is thinner than elsewhere. Ferryboat Lane provides a robust boundary (see pages 27-29). As a result of the boundary recommendation, HGA7 has been revised (and is referred to in the SHLAA as site 416B). Ground conditions, physical constraints, hydrology and access appear to be suitable and feasible and there is no direct impact to Category 1 constraints. Overall scheme design will address specific requirements set out in HGA7. The site proposed is smaller than that put forward by the developer, Hellens, in order to appropriately mitigate impacts and minimise encroachment into the wildlife and Green Infrastructure corridor of the River Wear, to minimise impact to priority species and protected habitat, and minimise impact to the landscape character and key views. The impact of the site to the wildlife and green infrastructure corridor is considered	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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							<p>carriageway, and with poor access. It impacts on high landscape character, key views of the river, negative impacts on wildlife and GI corridor. This proposal conflicts against policies SP1, NE1, NE2, NE4, NE6, ST2, ST3 and Figure 40.</p>	<p>permanent feature. There is significant uncertainty with the OAN uplift. The other sites proposed could cover any shortfall without this small site also being used (which should be weighed against the considerable harm incurred in this area).The site is poorly located, separated from urban areas by a dual carriageway, and with poor access. It impacts on high landscape character, key views of the river, negative impacts on wildlife and GI corridor. This proposal conflicts against policies SP1, NE1, NE2, NE4, NE6, ST2, ST3 and Figure 40.</p>		<p>permanent feature. There is significant uncertainty with the OAN uplift. The other sites proposed could cover any shortfall without this small site also being used (which should be weighed against the considerable harm incurred in this area).The site is poorly located, separated from urban areas by a dual carriageway, and with poor access. It impacts on high landscape character, key views of the river, negative impacts on wildlife and GI corridor. This proposal conflicts against policies SP1, NE1, NE2, NE4, NE6, ST2, ST3 and Figure 40.</p>	<p>permanent feature. There is significant uncertainty with the OAN uplift. The other sites proposed could cover any shortfall without this small site also being used (which should be weighed against the considerable harm incurred in this area).The site is poorly located, separated from urban areas by a dual carriageway, and with poor access. It impacts on high landscape character, key views of the river, negative impacts on wildlife and GI corridor. This proposal conflicts against policies SP1, NE1, NE2, NE4, NE6, ST2, ST3 and Figure 40.</p>		<p>to be moderate, although its impact must be considered in line with the existence of development that separate the site from the River Wear and associated protected habitat. The impact can be minimised with sensitive design and boundary treatment, particularly along the southern edge of the site. As an area of higher landscape value, Policy SS4 requires the development to achieve a high architectural quality, particularly to protect long distance views throughout the development towards Penshaw Monument and along the River Wear corridor. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. There is concern regarding the noise and vibration impacts from the adjacent A19 and A1231. Appropriate mitigation will be necessary in the form of landscape buffer zones along the north and west edges of the site, including increased tree buffering as necessary. There are no direct impacts to protected wildlife sites on site, and Hellens has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. The development can sympathetically support local architectural styles and materials. It is considered that the setting of the Grade II listed Shipwrights Public House is not impacted upon. By contrast, the larger site proposed by Hellens would encroach development upon the setting of the Public House. The developer, Hellens, has confirmed that the land is classed as Grade 3b agricultural land which is defined as being of moderate quality (Lichfields: Response to Consultation on Sunderland Core Strategy 2017, paragraph 3.15).Therefore using this land would not be contrary to the NPPF. The land is in private ownership, with access limited. A public footpath runs across the site which will have to be considered as the site comes forward. However, other cycle and walking routes associated with the River Wear corridor lie to the south of the site and are not affected. The site sits well away from Flood Zones 2 and 3, associated with the River Wear. The site is affected by surface water flooding along a natural swale along the site's western boundary - initial scheme design has considered how this can be treated through the use of greenspace and SUDS and provide</p>	

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														easements for public sewers as necessary. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains.	
Regeneration & Property		Sunderland City Council	PD3375	Policy	SS4	Support						HGA8 represents a sustainable site in the urban area with excellent transport connections. It forms part of the extensive Fulwell Quarries Recreational Site and formerly included a playing field. The site is at low risk of flooding and has good access to Schools. Site can provide much needed large family homes and prevent further out-migration to neighbouring authorities.	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dixon	Highways England	PD4843	Policy	SS4	Object			Highways England consider the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			Highways England consider the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on

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															the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.
		Hellens Group	PD4761	Policy	SS4	Object			Minor amendments should be made to align policy better to the NPPF. Specifically in respect of HGA7, the site is fully supported, but the full site set out in Draft CSDP should be allocated. Policy should be altered to allow flexibility with regards to retaining trees on site and to seek to retain long distance views towards Penshaw Monument and River Wear Corridor.		Minor amendments should be made to align policy better to the NPPF. Specifically in respect of HGA7, the site is fully supported, but the full site set out in Draft CSDP should be allocated. Policy should be altered to allow flexibility with regards to retaining trees on site and to seek to retain long distance views towards Penshaw Monument and River Wear Corridor.		To ensure Policy SS7 is consistent with national policy, the following revisions are proposed: 2. address impacts and make provision or contributions towards education provision and healthcare "where necessary"; 3. Where appropriate and proportional to the development enhance access to local facilities and services. In terms of HGA7, the following minor amendments are put forward: (v) retain healthy trees where possible; (viii) seek to retain long distance views...	The Council considers that the level of detail is appropriate and the approach is sound, enabling in particular that a number of sensitive site issues are identified and addressed, and specifically addressed at the planning application stage.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Mackings	Paul Mackings Consulting Ltd	PD2952	Policy	SS4	Object		Object to allocation of Sites HGA7 and 8 of Policy SS4 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Object to allocation of Sites HGA7 and 8 of Policy SS4 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.		Object to allocation of Sites HGA7 and 8 of Policy SS4 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Object to allocation of Sites HGA7 and 8 of Policy SS4 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Take into account availability of site at Hendon Paper Mill and only make changes to Green Belt if exceptional circumstances can still be justified.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to be retained for employment purposes.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1313	Policy	SP4	Object					Object to SP4 (specifically the Green Belt sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	Object to SP4 (specifically the Green Belt sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	Both HGA areas in the Green Belt mentioned in this Policy should be deleted	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. The Council's view is that in order for the site to be made sustainable in the longer term it needs to provide a local centre, with local facilities, such as a primary school.</p>	
Richard	Cowen	CPRE North East	PD1162	Policy	SS4	Object				Object to SS4 (sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, in terms of HGA7, it is considered that the proposal will dramatically and adversely alter the existing community.	Object to SS4 (sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, in terms of HGA7, it is considered that the proposal will dramatically and adversely alter the existing community.	To delete the policy.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Council has set out its specific responses relating to the sites HGA7-8 in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Pollard	Naturally Wild Consultants Ltd	PD163	Policy	SS4	Object		Objection on the grounds that the policy and site contravene NPPF para 109 as they fail to recognise and protect Ecosystem Services and thus minimising impacts on biodiversity; contravenes the NPPF in regards to their being no exceptional or special circumstances relating to the proposal to remove HGA7 from the Green Belt for housing particularly when it is better suited to "urban regeneration and the use of brownfield		Object to SS4 (sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, in terms of HGA7, it is considered that the proposal will dramatically and adversely alter the existing community.	Object to SS4 (sites HGA7-8) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. Specifically, in terms of HGA7, it is considered that the proposal will dramatically and adversely alter the existing community.	To delete the policy.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Council has set out its specific responses relating to the sites HGA7-8 in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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									land"; and it contravenes section 40 of the NERC Act 2006 whereby SCC has a duty to have regard to conserving biodiversity.						
Debbie	Gates		PD310	Policy	SP4	Object		Considers policy SP4 not to be positively prepared.	Considers policy SP4 not to be effective.		Objection on the grounds that the policy and site; contravene NPPF para 109 as they fail to recognise and protect Ecosystem Services and thus minimising impacts on biodiversity; contravenes the NPPF in regards to their being no exceptional or special circumstances relating to the proposal to remove HGA7 from the Green Belt for housing particularly when it is better suited to "urban regeneration and the use of brownfield land"; and it contravenes section 40 of the NERC Act 2006 whereby SCC has a duty to have regard to conserving biodiversity.	Objection on the grounds that the policy and site; contravene NPPF para 109 as they fail to recognise and protect Ecosystem Services and thus minimising impacts on biodiversity; contravenes the NPPF in regards to their being no exceptional or special circumstances relating to the proposal to remove HGA7 from the Green Belt for housing particularly when it is better suited to "urban regeneration and the use of brownfield land"; and it contravenes section 40 of the NERC Act 2006 whereby SCC has a duty to have regard to conserving biodiversity.	Put HGA7 back into the Green Belt and thus protect it from further development - This will make the green corridor surrounding River Wear a viable wildlife corridor again - It is the only 'green' corridor within the larger conurbation of Sunderland thus serves a vital purpose.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Pollard	Naturally Wild Consultants Ltd	PD1536	Policy	SS4	Object					Objects to Policy SS4 (specifically site HGA7).The site is contrary to NPPF paragraph 109 as the site proposed fails to minimise impacts on biodiversity or provide net gains in biodiversity. Proposal also contravenes Section 40 of the NERC Act 2006. The site also detrimentally impacts on the only green corridor in the local area. Argues that exceptional and special circumstances are not justified, especially as plan attempts to achieve housing resources over and above Government guidelines. Proposal will directly threaten priority species, and nearby protected wildlife sites along the River Wear. The proposals will shrink the active wildlife corridor from 400m to 40m width.	Objects to Policy SS4 (specifically site HGA7).The site is contrary to NPPF paragraph 109 as the site proposed fails to minimise impacts on biodiversity or provide net gains in biodiversity. Proposal also contravenes Section 40 of the NERC Act 2006. The site also detrimentally impacts on the only green corridor in the local area. Argues that exceptional and special circumstances are not justified, especially as plan attempts to achieve housing resources over and above Government guidelines. Proposal will directly threaten priority species, and nearby protected wildlife sites along the River Wear. The proposals will shrink the active wildlife corridor from 400m to 40m width.	No proposed modifications.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. More specifically, in terms of biodiversity, there are no direct impacts to protected wildlife sites on site, and an Ecology statement identifying that the impact on protected and priority species is low. Nevertheless, sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment (the gap is expected to reduce to 250m and not the 40m as suggested).In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														by the buffering constraints. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	
Roland	Buckingham		PD651	Policy	SS4	Object		Objects to Policy SS4 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; that agricultural land should be protected; that local facilities are distanced from site and other side of dual carriageway; adverse impact to landscape.	Objects to Policy SS4 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; that agricultural land should be protected; that local facilities are distanced from site and other side of dual carriageway; adverse impact to landscape.	Objects to Policy SS4 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; that agricultural land should be protected; that local facilities are distanced from site and other side of dual carriageway; adverse impact to landscape.	Objects to Policy SS4 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; that agricultural land should be protected; that local facilities are distanced from site and other side of dual carriageway; adverse impact to landscape.	Objects to Policy SS4 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; that agricultural land should be protected; that local facilities are distanced from site and other side of dual carriageway; adverse impact to landscape.	No modifications proposed.	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification for sites can be found in the above evidence base documents and relevant Compliance Statements. The Council considers these policies and the CSDP as a whole to be sound.</p>	
Debbie	Gates		PD311	Policy	SS4	Object		Considers policy SS4 not to be positively prepared.	Considers policy SS4 not to be positively prepared.		Considers policy SS4 not to be consistent with national policy as no need or evidence of exceptional circumstances for removing green belt.	Considers policy SS4 not to be justified. There are areas of brownfield land and empty properties that could be used.	Build on brownfield sites and regenerate the city centre to boost the economy. Retain green areas and use empty properties.	<p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further information relating to the site is included in the Compliance Statement (see Policy SP4 North Sunderland, and Policy SS4 North Sunderland Housing Growth Areas, in relation to site HGA7).</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD1806	Policy	SS4	Object						Objects to Policy SS4 on the grounds that the housing requirement is overambitious and unachievable. There is therefore no requirement for the Housing Growth Areas.	Delete Sites HGA7 and 8 from the plan and reinstate the Green Belt.	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement. The Council considers this Policy to be sound.	
Hilary	Metcalf		PD984	Policy	SS4	Object		Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A19 would not cope with extra traffic.	Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A19 would not cope with extra traffic.				No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Scott	Metcalf		PD1000	Policy	SS4	Object		Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A19 would not cope with extra traffic.	Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A19 would not cope with extra traffic.				No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>A Transport Assessment has been prepared for the HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p>	
Victoria	Hedley		PD808	Policy	SP4	Object		Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.			Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Remove Site HGA7 as a housing allocation and retain the land as Green Belt. Amend maps in Plan to show land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas).The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Christine	Gaughan		PD83	Policy	SP4	Object						Objection on the grounds that SP4 and the sale of Green Belt for housing will not meet the city's housing needs of	Suggests building the shortfall of 542 houses at affordable rents and sale values.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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											<p>providing a range and choice of housing types for affordable and larger family homes; the building program to encourage high earners to reside in Sunderland will increase the inequality of deprivation as there are no programs for social housing development; and Strategic Challenge 17 will not be limited value to private investors.</p>		<p>meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport,</p>	require modifications to the Plan. Therefore no modifications are proposed.

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														sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Plan also contains a Policy (H2) which addresses the Council's approach to affordable homes. Further justification is set out in the Compliance Statement. The Council considers this Policy to be sound.	
Brian	Carmody		PD267	Policy	SP4	Object		Objects to Policy SP4 on the basis that it is not positively prepared.			Objects to policy SP4 on the grounds that it is not consistent with National Policy.	Objects to Policy SP4 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Carmody		PD270	Policy	SP4	Object		Objects to Policy SP4 on the basis that it is not positively prepared.			Objects to policy SP4 on the grounds that it is not consistent with National Policy.	Objects to Policy SP4 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Bradley	Sunderland Green Party	PD4478	Policy	SS4	Object				Oppose both sites for broad reasons outlined in relation to Policy SP1. Specific objection in relation to: HGA7 - loss of agricultural land; unsustainable/distant from local facilities and segregated by dual carriageway; not accessed by public transport; landscape impact. HGA8 - loss of playing fields; impact on local health by removing sports fields/greenspace.		Oppose both sites for broad reasons outlined in relation to Policy SP1. Specific objection in relation to: HGA7 - loss of agricultural land; unsustainable/distant from local facilities and segregated by dual carriageway; not accessed by public transport; landscape impact. HGA8 - loss of playing fields; impact on local health by removing sports fields/greenspace.	HGA's should be deleted.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in the Compliance Statement. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Hirst		PD365	Policy	SP4	Object	Considers policy SP4 is not compliant with law.	Considers policy SP4 not to have been positively prepared.	Considers policy SP4 not to be effective.		Considers Policy SP4 not to be consistent with national policy as failure to justify green belt deletions.	Considers policy SP4 not to be justified. The test of exceptional circumstances has not been based on sound information and planning judgement. The evidence base for calculating OAN is fundamentally flawed and not consistent with	Withdrawal of policy and amendments to remove any reference to land at North Hylton as a HGA.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the Green Belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												NPPF.		Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in the Compliance Statement.	
John	Tumman	Sunderland Civic Society	PD941	Policy	SP4	Object						Objects to policy SP4.2 and the HGA sites as considers it not to be justified as not needed due to the housing development proposed in the plan being over ambitious and unachievable. Number of new homes in the plan needs to be reduced to 10,225. Deleting HGA's will retain integrity of the green belt, minimise urban sprawl and be more sustainable.	Delete policy SP4.2 and associated HGA's. Reinstate the greenbelt in these areas. Policy SS4 would also be superfluous.	The Council consider that exceptional circumstances exist which justify an amendment to the Green Belt. Further details are provided within the Exceptional Circumstances report and the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Hirst		PD367	Policy	SS4	Object	Considers policy SS4 is not compliant with law.	Considers policy SS4 not to have been positively prepared.	Considers policy SS4 not to be effective.		Considers Policy SS4 not to be consistent with national policy as failure to justify green belt deletions.	Considers policy SS4 not to be justified. The test of exceptional circumstances has not been based on sound information and planning judgement. The evidence base for calculating OAN is fundamentally flawed and not consistent with NPPF.	Withdrawal of policy and amendments to remove any reference to land at North Hylton as a HGA.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Anne	Collier		PD158	Policy	SS4	Object		Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.			Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.	Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.	Site HGA7 should be deleted from policy SS4. The policies map should be revised to indicate that site HGA7 will remain as greenbelt for the duration of the plan (2033) and beyond.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further information relating to the site is included in the Compliance Statement (see Policy SP4 North Sunderland, and Policy SS4 North Sunderland Housing Growth Areas, in	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Anne	Collier		PD8501	Policy	SP4	Object							relation to site HGA7).		
							Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.				Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.	Object on the grounds that the removal of site HGA7 from the Green Belt is unjustified and that there are numerous brownfield sites that have not been considered for development for affordable housing for younger people, before Green Belt.	Site HGA7 should be deleted from policy SS4. The policies map should be revised to indicate that site HGA7 will remain as greenbelt for the duration of the plan (2033) and beyond.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas). The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Neil	Cole	South Tyneside Council	PD4396	Policy	SP4	Support			South Tyneside Council support the policy and note the proposal for new residential development at Fulwell (HGA8). South Tyneside Council welcome the HGAs requirement which seeks to maintain and strengthen the wildlife/green infrastructure corridors.			No modification proposed	The Council will continue to work with South Tyneside as part of the Duty to Cooperate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Dave	McGuire	Sport England	PD4499	Policy	SP4	Object						No modification proposed	SCC and the SE have been working together on the Parklife Programme. In identifying the city's needs for 'Hub' facilities an FA modelling exercise was undertaken to map current and future participation requirements in the city against existing and potential new facilities, a football/ pitch blueprint was produced. This blueprint identified the 'appropriate' number of core football 'Hubs' at which the city's football demands can be met. To inform the Parklife Programme bid, the city's current Playing Pitch Plan (PPP) has recently been updated and developed to include an overarching, needs driven, strategic plan for the city. The PPP provides an overview of demand and supply issues associated with pitch requirements in the following sports - football, cricket, rugby union, rugby league, hockey, tennis and bowls. The PPP indicates that following the development of the Parklife Hub sites it is highly likely that some football sites will become surplus to requirements and subject to various consents (Planning, SE etc) could be disposed of, thereby releasing capital receipts for the Council and covering the cost of the initial capital investment. The PPP will be need to be updated, in consultation with SE, two years after the first Hub site in the city opens in order to identify any sites which have become surplus to requirement as a result the opening of the sports Hubs. If and when the PPS identifies the sites surplus then the sites then they can be brought forward for development. The Council proposes a modification to clarify the position (M25).	<u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u>	
		Hellens Group	PD4730	Policy	SP4	Support with mods					Support for the policy and paragraph 4.49. The consultee supports the allocation of HGA7 but put forward that a larger site area should be allocated, and that this would reduce the risk of further Green Belt releases being required potentially sooner in the Plan review. If this proposal is not supported, it should	It is considered that a logical and preferred approach would be to allocate the wider land at HGA7 (North Hylton), which is available for development now, to ensure there is sufficient flexibility for further growth in the sub area and to reduce the likelihood of the requirement for further Green Belt release.	The Council has set out a response in relation to both of these sites in the Compliance Statement (see Policy SS4 North Sunderland Housing Growth Areas, and Policy SS3 Safeguarded Land). Most significantly, site 416 was considered to perform strongly against Green Belt purpose and was therefore discounted (fundamental impact in terms of urban sprawl and countryside encroachment). Additionally, this site encroached too far into the wildlife and Green Infrastructure corridor of the River Wear (to within 50m), and was considered to have additional impacts in relation to priority species	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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												be safeguarded under policy SS3.	Hellens also requests the following change to Policy SP4: North Sunderland will continue to be the focus for regeneration and renewal "whilst ensuring its future sustainability."	and protected habitat, and in terms of its impact to the landscape character and key views.	
		The Trustees of Athenaeum Pension Scheme	PD42	Policy	SS4	Support						Support the designation of a Housing Growth Area at Fulwell, policy SS4.	No modification proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		The Trustees of Athenaeum Pension Scheme	PD41	Policy	SP4	Support						Support the designation of a Housing Growth Area at Fulwell, policy SS4.	No modification proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD1058	Policy	SS4	Object						Considers policy SS4, HGA7 not to be justified due to the council's green belt review identifying one of the fields forming the HGA as having a major overall adverse impact and another a moderate overall adverse impact. Development of site would significantly undermine the integrity of this open area. No scope to mitigate the visual impact through landscaping. Housing on northern and western edge could be subject to high levels of noise and pollution from A1231 and A19.	Delete HGA7 Ferryboat lane and delete from proposals map. Reinstate the land as green belt as part of policy NE6.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD95	Policy	SS4	Support with mods						Historic England would like the reference 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.	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.	The Council acknowledges Historic England's representation and agree as part of a Statement of Common Ground to change the stated designation of heritage assets identified in Policy SS4: HGA8 Fulwell Mill (SD.8k). As part of the Statement of Common Ground, changes were agreed to the Development Frameworks (2018) evidence base and this has been updated accordingly. (M24).	Be of high architectural quality and designed to respect the local vernacular and to key views, including the setting of the WW1 Acoustic Mirror Scheduled Ancient Monument and Grade II listed buildings, Grade II* listed Fulwell Mill and Grade II listed Lime Kilns;
Colin	Ford		PD173	Policy	SS4	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. Site HGA 8 is within 5km of the coast and therefore following the April 2018 Court of Justice of European Union ruling case323/17 requires a site HRA to be undertaken. There is no evidence that this site has been subject to a full site specific screening test for likely significant affects.	development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. Site HGA 8 is within 5km of the coast and therefore following the April 2018 Court of Justice of European Union ruling case323/17 requires a site HRA to be undertaken. There is no evidence that this site has been subject to a full site specific screening test for likely significant affects.		in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	
Colin	Ford		PD174	Policy	SS4	Object					Object on the grounds that the evidence base is weak and not consistent with National Policy.	Object on the grounds that the removal of the site from the Green Belt is not justified. The proposals would result in the destruction of wildlife habitat, which is not justified for more housing. New homes should be built on brownfield sites and not Green Belt.	Remove site HGA7 from Policy SS4 and retain the land as Green Belt.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in Compliance Statement SP4. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Linda	Anderson		PD228	Policy	SS4	Object		Object to site HGA7, as they feel that the plan has not been			Object to Site HGA7 of Policy SS4 on the grounds that there	Object to Site HGA7 of Policy SS4 on the grounds that there	Site HGA7 should be removed from the Plan.	After assessing all reasonable alternative options, the most sustainable method of delivering the	The Council considers there have been no soundness or legal

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								positively prepared.			are no exceptional circumstances to release the land from the Green Belt, the site was found to make a positive contribution to the Green Belt during the Stage 1 Green Belt Assessment, which concluded it was not suitable for development, none of the reasons for this judgement have changed.	are no exceptional circumstances to release the land from the Green Belt, the site was found to make a positive contribution to the Green Belt during the Stage 1 Green Belt Assessment, which concluded it was not suitable for development, none of the reasons for this judgement have changed.		objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Stage 1 Green belt review recommended that the land area (HY2) should be considered further at Stage 2. Full justification of this site is included in the Compliance Statement (see Policy SS4).	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Martin	Dixon		PD255	Policy	SS4	Object					Object to Site HGA7 of Policy SS4 on the grounds that there are no exceptional circumstances to release the land from the Green Belt, the site was found to make a positive contribution to the Green Belt during the Stage 1 Green Belt Assessment, which concluded it was not suitable for development, none of the reasons for this judgement have changed.	Object to Site HGA7 of Policy SS4 on the grounds that there are no exceptional circumstances to release the land from the Green Belt, the site was found to make a positive contribution to the Green Belt during the Stage 1 Green Belt Assessment, which concluded it was not suitable for development, none of the reasons for this judgement have changed.	Site HGA7 should be removed from the Plan.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Stage 1 Green belt review recommended that the land area (HY2) should be considered further at Stage 2. Full justification of this site is included in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Elaine	Davidson		PD251	Policy	SS4	Object					Object to Site HGA7 of Policy SS4 on the grounds that the policy is not compliant with National Policy which indicates that Green Belt land can only be developed in exceptional circumstances, housing should be near transport hubs, concern over impact on Grade 1 listed building and local infrastructure. Concerns over consultation process.		Development should be focussed in the city centre.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Specifically, the site would not significantly impact on any Grade I listed properties (Penshaw Monument being the nearest), and it is considered that the setting of the Grade II listed Shipwrights Public House is not impacted upon. In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. Full justification of this site is included in the Compliance Statement (see Policy SS4).	
Victoria	Hedley		PD809	Policy	SS4	Object		Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.			Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Remove Site HGA7 as a housing allocation and retain the land as Green Belt. Amend maps in Plan to show land as Green Belt.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Full justification of this site is included in the Compliance Statement (see Policy SS4). The maps shown in the CSDP relate to the revised Green Belt boundary (as proposed), which proposes to remove the site from the existing Green Belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Brian	Carmody		PD268	Policy	SS4	Object		Objects to Policy SS4 on the basis that it is not positively prepared and Site HGA7 should not be included.			Objects to Policy SS4 on the grounds that it is not consistent with National Policy.	Objects to Policy SS4 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Full justification of this site is included in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Carmody		PD271	Policy	SS4	Object		Objects to Policy SS4 on the basis that it is not positively prepared and Site HGA7 should not be included.			Objects to Policy SS4 on the grounds that it is not consistent with National Policy.	Objects to Policy SS4 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Full justification of this site is included in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3243	Policy	SS4	Object					Removal of Site HGA7 from the Green Belt has not been adequately justified. The Plan does not include any	Removal of Site HGA7 from the Green Belt has not been adequately justified. The Plan does not include any	The Plan requires a wholesale review of the evidence base.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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											assessment of exceptional circumstances in relation to the Green Belt. The Plan has no reliable evidence base to either demonstrate exceptional circumstances in principle or justify the change of boundary for the site. Failure to justify the Green Belt deletions is contrary to the NPPF. The allocation ignores the wealth of evidence of harm to biodiversity and the Green Belt. The allocation is flawed as it allocates the site prior to a HRA being undertaken or any meaningful assessment of the impact on the Wildlife and Green Infrastructure corridor, the views of Sunderland from the A19 and Claxheugh Rock, the Area of High Landscape Value and the safety of the A1231.	assessment of exceptional circumstances in relation to the Green Belt. The Plan has no reliable evidence base to either demonstrate exceptional circumstances in principle or justify the change of boundary for the site. Failure to justify the Green Belt deletions is contrary to the NPPF. The allocation ignores the wealth of evidence of harm to biodiversity and the Green Belt. The allocation is flawed as it allocates the site prior to a HRA being undertaken or any meaningful assessment of the impact on the Wildlife and Green Infrastructure corridor, the views of Sunderland from the A19 and Claxheugh Rock, the Area of High Landscape Value and the safety of the A1231.		the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA7 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. More specifically, in terms of biodiversity, there are no direct impacts to protected wildlife sites on site, and an Ecology statement identifying that the impact on protected and priority species is low. Nevertheless, sensitive design will be required to mitigate for impacts to protected/priority species - if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Policy SS4 specifically requires the development to limit impact on the River Wear wildlife and green infrastructure corridor running west-east and limit any impact on the areas landscape character through sensitive design and boundary treatment. In addition, buffer zones are to be created to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site, and all healthy trees and hedgerows will be retained. Habitats Regulations Assessment must also be undertaken and appropriate mitigation provided. The site has been assessed as part of the Sustainability Appraisal which states that impacts can be mitigated against and that development will be limited by the buffering constraints. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy and SP4 North Sunderland), and for HGA7 (see Policy SS4 North Sunderland Housing Growth Areas).	require modifications to the Plan. Therefore no modifications are proposed.
		The Trustees of Athenaeum Pension Scheme	PD43	Policy	SS4	Object		Support the release of Housing Growth Area at Fulwell, but object that the site does not include the golf driving range and associate development to the North. The site is considered to be a sustainable and developable location for housing development. There is an alternative boundary which could be justified. The development would enhance and maintain GI corridors, wildlife and provide sensitive boundary treatment on all side. Tree belt could be enhanced and additional secured. Greenspace could also be improved. Access could be via the roundabout on Fulwell Road.			Support the release of Housing Growth Area at Fulwell, but object that the site does not include the golf driving range and associate development to the North. The site is considered to be a sustainable and developable location for housing development. There is an alternative boundary which could be justified. The development would enhance and maintain GI corridors, wildlife and provide sensitive boundary treatment on all side. Tree belt could be enhanced and additional secured. Greenspace could also be improved. Access could be via the roundabout on Fulwell Road.	Support the release of Housing Growth Area at Fulwell, but object that the site does not include the golf driving range and associate development to the North. The site is considered to be a sustainable and developable location for housing development. There is an alternative boundary which could be justified. The development would enhance and maintain GI corridors, wildlife and provide sensitive boundary treatment on all side. Tree belt could be enhanced and additional secured. Greenspace could also be improved. Access could be via the roundabout on Fulwell Road.	Allocate a larger area to include the golf driving range and associated buildings.	The Council considered this land area as part of the Stage 3 Green Belt Site Selection Report (pages 87-88), and this concluded that the site was not available (no reps received in 2017), with moderate impacts to Green Belt purpose to additionally consider. Furthermore, the 2018 Green Belt Boundary Assessment specifically considered this specific area and concluded that "we have taken account of the wider context to the west of the A1018, as well as the important contribution that this part of the Green Belt makes in terms of maintaining a strategic gap between Sunderland and South Tyneside. In our assessment, releasing further land to the north of HGA8 as currently defined would weaken the role of this part of the Sunderland Green Belt." In light of this, the Council therefore considers that the site is not supported, and that the land remains as Green Belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mars hall	Normington		PD419	Policy	SP5	Object				Considers policy SP5 not to be compliant with DTC. Housing development in South Hylton not	Considers policy SP5 not to be consistent with National Policy. Housing development in		Development should be clearly defined on a drawing and described as others are.	Being a Strategic Plan, policy SP5 sets out the strategic aims for South Sunderland and it is not the intention to set out site specific housing allocations within this policy. It is the	The Council considers there have been no soundness or legal compliance issues raised by this

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										mentioned in Policy. Impacts of developing a site in relation to extra traffic, wildlife, sport and recreation and play park. Covenant on site.	South Hylton not mentioned in Policy. Impacts of developing a site in relation to extra traffic, wildlife, sport and recreation and play park. Covenant on site.			role of the allocations and designations plan which will follow the CSDP to set out site specific allocations for housing. Any housing sites within South Hylton which are deliverable or developable will be included with the SHLAA and defined on the SHLAA MAP.	representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD207	Policy	SS5	Object				The EA recommend an SFRA level 2 assessment on the port, especially the COMAH (Control of Major Accident Hazard) site which use the ports infrastructure as a point of mass evacuation. The EA has seen a draft copy of this report and agreed upon the principles within it. If this assessment will be part of the Local Plan evidence base then the EA will the plan to be sound.		No Modification proposed.	The Council have submitted the SFRA level 2 as part of the evidence base supporting the local plan. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2074	Policy	SP5	Support						Support Policy SP5, which recognises the importance of the SSGA as a new sustainable community.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD3923	Policy	SP5	Support with mods						Support the stated aspirations for South Sunderland and the inclusion of the SSGA within Policy SS5. Object to the inclusion of the former Hendon Paper Mill site as employment land. There is no realistic prospect of the site being brought forward for employment use. Residential use would be appropriate on this site and Persimmon intend to submit a planning application in late 2018.	Remove the former Paper Mill site in Hendon from KEA1.	The site referenced in the representation is required for employment purposes and as such is to be retained for that use.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD4857	Policy	SP5	Support with mods						Supports SP5 overall, but requests amendment to remove land east of A19 at Middle Herrington and Hastings Hill from the Green Belt in the Plan period. Consultee would prefer this land allocated for housing within plan period, or failing that, to be safeguarded.	Broad support of Policy SP5 but requests amendment to include land east of the A19 at Middle Herrington and Hastings Hill as a Housing Growth Area, within the plan period or included as safeguarded land (Policy SS3).	The site is not supported in light of both the impact to Green Belt purpose and the results of the Green Belt Boundary review. There remains a moderate overall adverse impact to Green Belt purpose in terms of checking unrestricted sprawl and in safeguarding countryside from encroachment (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 147, 169 and 171). This area provides significant support to the Green Belt gap between Houghton and Sunderland, most critically between the area between West Herrington and Middle Herrington. The Green Belt Boundary Review (p35-36) also recommends that there should be no change to the Green Belt boundary, stating that "The existing boundary on the western edge of Grindon, south to Thorney Close, running south following the built-up area at Middle Herrington and bounding West Park "provides a logical and defensible boundary and there is no justification for making strategic amendments to this part of Sunderland's Green Belt boundary in our assessment." There are further significant issues that affect deliverability of the 3 sites put forward, including the immediate impact to 2 Scheduled Ancient Monuments, suitable access into the sites, impact to a SSSI, impact in parts to flooding, to historic ridge and furrow and to exposure with the A19.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Macking	Paul	PD291	Policy	SP5	Support						Welcome the stated	No modifications	The site is required to contribute to	The Council considers

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	s	Mackings Consulting Ltd	6			rt with mods					aspirations for South Sunderland in Policy SP5, but feel that there is no realistic prospect of the former Hendon Paper Mill site coming forward for employment use. The site should be removed from KEA1 and left as white land which would allow residential development.	proposed. Suggested modifications would be to Policy EG2.	the supply of employment land required within the city, as set out within the Employment Land Review. Further justification is set out within the Compliance Statement.	there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5361	Policy	SS6	Object		Barratt David Wilson Homes (BDW) is concerned that the delivery of SSGA is not transposed accurately in the Plan. BDW consider that the Plan should be clear about the expected delivery of the SSGA and consider that the delivery of the site will be slower than expected due to the delivery of infrastructure. For example BDW's site at Cherry Knowle cannot exceed 20 houses until Seaton Junction improvement. The number needs clarifying otherwise the OAN will not be achieved.	Barratt David Wilson Homes (BDW) is concerned that the delivery of SSGA is not transposed accurately in the Plan. BDW consider that the Plan should be clear about the expected delivery of the SSGA and consider that the delivery of the site will be slower than expected due to the delivery of infrastructure. For example BDW's site at Cherry Knowle cannot exceed 20 houses until Seaton Junction improvement. The number needs clarifying otherwise the OAN will not be achieved.	Barratt David Wilson Homes (BDW) is concerned that the delivery of SSGA is not transposed accurately in the Plan. BDW consider that the Plan should be clear about the expected delivery of the SSGA and consider that the delivery of the site will be slower than expected due to the delivery of infrastructure. For example BDW's site at Cherry Knowle cannot exceed 20 houses until Seaton Junction improvement. The number needs clarifying otherwise the OAN will not be achieved.	Barratt David Wilson Homes (BDW) is concerned that the delivery of SSGA is not transposed accurately in the Plan. BDW consider that the Plan should be clear about the expected delivery of the SSGA and consider that the delivery of the site will be slower than expected due to the delivery of infrastructure. For example BDW's site at Cherry Knowle cannot exceed 20 houses until Seaton Junction improvement. The number needs clarifying otherwise the OAN will not be achieved.	Review the number of dwellings for SSGA expected to be delivered in the Plan period.	A realistic approach has been adopted to build out rates in South Sunderland given the quantum of development and the potential number of developers on site at any one time, as such the build out rate increases overtime, starting off at 100 per year and increasing to 195 when all sites are expected to be building at full capacity. The build out rates for each individual site were discussed at the SHLAA Panel meeting February 2018 and agreed as appropriate. All S106s have been agreed to by those developments that have permission. The delivery of infrastructure is on programme with the two school extensions already having planning approval and a planning application is currently being prepared for the Ryhope Doxford Link Road, due to be submitted Early 2019. A £20 million MHCLG Forward Funding bid is being prepared, to be submitted March 2019, to further facilitate infrastructure provision. There is no anticipated problems/delays to the infrastructure delivery timetable.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Francis	Nicholson	Bellway Homes Ltd	PD1824	Policy	SS6	Support with mods					Generally support Policy SS6 and the Doxford-Ryhope link road but would like the alignment to be altered to that it does not sterilise some of their land interest.	Re-align the route of the Ryhope Doxford link road on the Policies Map.	Comment noted. The alignment shown on the Policies Map is consistent with that within the existing UDP and SSGA SPD. The final alignment will be subject to detailed survey work and design.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dixon	Highways England	PD4845	Policy	SS6	Object		Highways England does not consider the Plan to be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation

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															of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.
Hilary	Metcalf		PD988	Policy	SS6	Object		Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A690/A19 junction and A19 would not cope with extra traffic.	Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A690/A19 junction and A19 would not cope with extra traffic.				No modifications proposed.	The Council has prioritised the development of brownfield sites; however there is an insufficient supply of deliverable brownfield sites suitable for residential development. The Council has prepared a Transport Assessment which demonstrates that the road network would be able to accommodate levels of growth proposed by the plan. Any necessary mitigation has been identified within the Infrastructure Delivery Plan. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Scott	Metcalf		PD991	Policy	SS6	Object		Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A690/A19 junction and A19 would not cope with extra traffic.	Objects to Policy, stating that there are numerous brownfield sites available and suitable for development and that the A690/A19 junction and A19 would not cope with extra traffic.				No modifications proposed.	The Council has prioritised the development of brownfield sites; however there is an insufficient supply of deliverable brownfield sites suitable for residential development. The Council has prepared a Transport Assessment which demonstrates that the road network would be able to accommodate levels of growth proposed by the plan. Any necessary mitigation has been identified within the Infrastructure Delivery Plan. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD904	Policy	SS6	Object						Considers point 2 of policy SS6 is not justified as the policy requires 10% affordable housing for the SSGA and this should be in line with policy H2 and provide 15% due to the SSGA providing a great opportunity to provide a good level of affordable housing.	Amend policy SS6.2 to read 15% affordable housing.	An infrastructure delivery study and viability assessment have been undertaken to support the SSGA. Given the scale of development and HRA implications there are significant infrastructure asks of the developers. Approximately £24 million of infrastructure, not including the cost of providing affordable housing and Suitable Alternative Natural Green space (SANG) is being sought from the 4 development sites. Increasing the affordable housing ask would threaten viability. Three of the four sites already have planning permission and agreed to a contribution of 10% affordable housing. It is anticipated that a	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														planning application will have been submitted and pending before the Local Plan examination.	
John	Tumman	Sunderland Civic Society	PD921	Policy	SS6	Object			Considers policy SS6 not to be effective as the need for the scale of housing proposed in the SSGA is not proven as the overall dwelling requirement of 13,410 is flawed. Due to 3 sites having planning permission the objection is limited to the one major uncommitted site, land north of Burdon Lane. This would be an unnecessary greenfield development, result in merging of settlements and undermine initiatives to regenerate inner area locations. Lead to less sustainable form of development.				Delete from proposal map housing allocation covering land north of Burdon Lane. Re-instatement of settlement break on proposals map. Modification of first part of policy SS6 to remove reference to land north of Burdon Lane and change housing numbers to 2,000.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is provided within the Compliance Statement. Delivery of the SSGA is a key component in ensuring that the Council can meet its housing requirement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1388	Policy	SS6	Support				Durham County Council previously made representations on the impacts of the SSGA on the local highway network in Durham. Through duty to cooperate meetings and planning obligations agreed with the developer, these issues have been satisfactorily resolved. Durham County Council also previously made representations on the impacts of the SSGA on the Durham Coast SAC, Durham Coast SPA, Northumbria Coast Ramsar and Heritage Coast, however through planning applications these issues have been satisfactorily resolved.			No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2236	Policy	SS6	Support		Support Policy SS6. The development will deliver significant economic, social and environmental benefits. It will make a significant contribution towards meeting the housing requirement and help to retain economically active and skilled residents. It will deliver a SSAANG and provide significant economic benefits.			Support Policy SS6. The development will deliver significant economic, social and environmental benefits. It will make a significant contribution towards meeting the housing requirement and help to retain economically active and skilled residents. It will deliver a SSAANG and provide significant economic benefits.	Support Policy SS6. The development will deliver significant economic, social and environmental benefits. It will make a significant contribution towards meeting the housing requirement and help to retain economically active and skilled residents. It will deliver a SSAANG and provide significant economic benefits.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimon Homes (Durham)	PD3943	Policy	SS6	Support						Support Policy SS6 which will deliver significant economic, social and environmental benefits to the local community, assist in delivery of the housing requirement and wider the range and choice of new homes. Fully endorse Lichfields representations on behalf of the Burdon Lane Consortium.	No modifications proposed.	The Council note this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Unknown		Church Commissioners For England	PD5243	Policy	SS6	Support with mods						Support Policy SS6, however consider that a larger site south of Ryhope is allocated for up to	Revise Figure 28 and supporting text to include Phase 2 in the allocation for South of Ryhope	The reasons for the Council not supporting this site as safeguarded land are as follows. The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report states on	The Council considers there have been no soundness or legal compliance issues raised by this

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											615 dwellings. Consider that the build out rate would be quicker than suggested and could be completed within Plan period. Disagree with assessment of Phase 2 in the SHLAA. Phase 2 is considered to be wholly deliverable in the Plan period.		Pages 112-114 that the proposed development land (Phase 2) would have a fundamental impact on the Green Belt (namely in terms of urban sprawl and countryside encroachment). Furthermore, the impact to settlement merging between Sunderland and Seaham is significant, virtually reducing the Green Belt gap to the County Durham side only. The Church Commissioners make reference to the original Stage 1 Green Belt Review carried out by the Council, which at the time stated that there were "exceptional strategic circumstances" that warranted further consideration of this site, as it was included as part of a larger "Location for Major Development" site. However, neither the 2017 or 2018 versions of the CSDP support this area as forming part of the South Ryhope site within the SSGA, nor is it included within the SSGA Masterplan. This was a consideration in the 2016 Growth Options consultation and is no longer applicable. Both Green Belt reports make clear that the land in question provides a fundamental role to Green Belt purpose and it should remain as such. In terms of biodiversity, the Council additionally considers that the proximity of Ryhope Dene Local Wildlife Site (which forms Ancient Semi-Natural Woodland) together with the proximity of the European protected coastline (which thereby invokes significant Habitats Regulations Assessment issues) are highly significant factors that limit further development within this area. The need to minimise further encroachment by residents and domestic pets onto the coastline, and need to retain significant buffers to Ryhope Dene are fundamental principles identified in both the CSDP and the SSGA Masterplan.	representation which require modifications to the Plan. Therefore no modifications are proposed.
	Carr		PD1580	Policy	SS6	Support					Supports Policy SS6 as it would facilitate a sustainable strategic expansion of Sunderland in a location which is already bound by residential development to the north, east and west. The Tunstall poultry farm site forms part of the site allocation and is previously developed land with good site access.	No proposed modifications.	Comment noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Alison	Morrell		PD4169	Policy	SS6	Object					The alignment of the Doxford-Ryhope Link Road keeps changing- the alignment shown in the Masterplan is supported, as it will move the road away from homes and help to relieve traffic noise/pollution and improve safety beside properties on Ruswarp Drive. However, there are other proposals to keep the alignment to the existing road- which is opposed by residents on this street. Furthermore, the bus only link is dropped (due to a petition) but which residents of Ruswarp Drive were in favour of- the bus only link was a sustainable option, so it is not clear why a less sustainable option is now supported.	No modifications proposed- Masterplan road alignment should remain.	The alignment shown on the Policies Map is consistent with that within the existing UDP and SSGA SPD. The final alignment will be subject to detailed survey work and design.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3383	Policy	SS6	Object					There is no justification for the	Amend Policy SS6 to require at least 15%	An infrastructure delivery study and viability assessment have been	The Council considers there have been no

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											affordable housing requirement for the SSGA sites to be lower than the 15% for all other sites. The maximum level of affordable housing should be sought to address the identified affordable housing imbalance.	affordable housing.	undertaken to support the SSGA. Given the scale of development and HRA implications there are significant infrastructure asks of the developers. Approximately £24 million of infrastructure, not including the cost of providing affordable housing and Suitable Alternative Natural Green space (SANG) is being sought from the 4 development sites. Increasing the affordable housing ask would threaten viability. Three of the four sites already have planning permission and agreed to a contribution of 10% affordable housing. It is anticipated that a planning application will have been submitted and pending before the Local Plan examination concludes.	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2267	Paragraph	4.62	Support with mods					Concerned that Paragraph indicates that once adopted all development on the SSGA should accord the SSGA SPD. The SPD does not assess the full financial burden of its requirements and could affect viability. Planning permission or minded to grant resolutions have been secured for 3 of the sites and not all SPD requirements were imposed on those applications. A consistent approach should be used for the remaining site.	Amend Paragraph 4.62 to indicate that development should broadly accord with the SPD.	A viability assessment has been undertaken that suggests there are no viability issues for any of the development sites, consequently all development proposals should be in accordance with the plan. (The SSGA SPD will be updated following the publication of the Inspectors report to ensure it aligns with Policy SS6). If viability issues do arise they will be considered in line with the NPPF and Local Plan viability policies.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2257	Paragraph	4.61	Support with mods					Disagree with Paragraph 4.61 as it is considered that there is a realistic prospect that the SSGA will be completed within the Plan period. The Paragraph is not sound because it does not represent the most appropriate strategy and conflicts with the NPPF.	Amend Paragraph 4.61 to indicate that the SSGA will be completed during the Plan period.	A realistic approach has been adopted to build out rates in South Sunderland given the quantum of development and the potential number of developers on site at any one time, as such the build out rate increases overtime, starting off at 100 per year and increasing to 195 when all sites are expected to be building at full capacity. The build out rates for each individual site were discussed at the SHLAA Panel meeting February 2018 and agreed as appropriate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
Barbara	Hooper	Historic England	PD96	Paragraph	4.61	Support with mods					Historic England welcomes the reference to protecting and enhancing heritage assets within paragraph 4.61. These assets include a cluster of Grade II and Grade II* building at Ryhope Pumping Station, along with the SAM.	No modification proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
Jordon, Adams, PD7259 Darren, Adamson, PD6978 Sharon, Aitken, PD6807 Rebecca, Aitken, PD6956 Leslie, Allan, PD7099 Gary, Allan, PD7101 Beverley, Allan, PD7255 Julie, Allison, PD6998 Megan, Anderson, PD7092 Christine, Angus, PD7170 Claire, Appleby, PD7001 Sharon, Badresingh, PD7219 Wayne, Badresingh, PD7273 Gavin, Bainbridge, PD7191 Karen, Bambrough, PD7042 Colin, Barnes, PD6803 Susan, Barnes, PD6951 Mary A, Barron, PD6974 Kevin, Barry, PD6969 Maria, Barry, PD6979 Kevin, Batters, PD6840 Sylvia, Batters, PD7158 Fred, Batton, PD6941 Lydia, Baxter, PD7121 Annmarie, Beckwith, PD7040 Rose, Beeston, PD7000 J, Betts, PD6993 Anne, Bingham, PD7043 Ashley, Bingham, PD7045 Louise, Black, PD7205 Kenneth, Bowen, PD6770 Pauline, Bradley, PD7249 Liam, Brady, PD7115				Policy	SS7	Object					Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.	Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.	Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.	Policy SS7 should delete the reference to site HGA9.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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<p>Norma, Bright, PD6830 Christine, Brough, PD7006 Margaret, Brown, PD7200 Julie, Burdett, PD7183 Stewart, Bywater, PD6963 Gemma, Campey, PD7088 Hayley, Carney, PD7032 Linda, Casey, PD7050 Rebecca, Chapman, PD7052 Dorothy, Charlesworth, PD7152 David, Charlton, PD7062 Malcolm, Clark, PD6946 Peter, Clements, PD7208 Ian, Collings, PD7049 Leeann, Collings, PD7079 Michelle, Collins, PD6829 John, Collinson, PD6966 Deborah, Collinson, PD6968 Angela, Coombs, PD8490 Alison, Cowley, PD8166 Brandon, Craig, PD6481 Beverley, Craig, PD6947 George, Dagg, PD7204 Gavyn, Davis, PD7056 Linda, Davis, PD7068 Jean, Davis, PD7033 Paul, Davis, PD7035 David, Davison, PD7093 Carole, Dawson, PD6960 annette, dean, PD7074 david, dean, PD7025 Pamela, Dennis, PD6987 Graeme, Dickinson, PD6769 Anita, Dickinson, PD7253 Kathryn, Dickman, PD7291 Lynn, Dinsdale, PD6972 Kevin, Dinsdale, PD6805 Rebecca, Dinsdale, PD6977 June, Dinsmore, PD6982 Jessica, Dinsmore, PD6961 Jean, Dixon, PD7095 Joy, Dixon, PD8492 Peter, Dobson, PD7145 Eleanor, Dover, PD6930 Jess, Dresser, PD7247 Phyllis Ann, Duffy, PD7203 Jordan, Dunn, PD7286 Lisa, Edwards, PD7179 Jennifer, Elliott-Farrow, PD6935 Callie, Elliott-Farrow, PD8507 Lorraine, Emerson-Broadbent, PD8493 Nicole, Engleby, PD7144 Christine, Engleby, PD7157, John, Evans, PD7138, Susan, Evans, PD7184, Robin, Everett, PD7201, Joan, Everett, PD7211, Keith, Farrow, PD7036, Janice, Farrow, PD7242, Ella, Fielding, PD7136, Joyce, Finley, PD7173, Mary Silvia, Forbes, PD7182, Terence, Foster, PD6797, Cherie, Foster, PD7190, Brian, Frankum, PD7231, Lorraine, Frost, PD7060, Jamie, Gaines, PD7223, Lynn, Gallon, PD6949, Tim, Gallon, PD6838, Brett, Gallon, PD6929, Colin, Garbutt, PD6997, Elizabeth, Gardener, PD7258, Lorna, Gatenby, PD7188, Ian, Gaunt, PD6985, Norman, Gawthorpe, PD7023, Ross, Gawthorpe, PD7055, Patricia, Gawthorpe, PD7069, Kathleen, Gibson, PD6955, Robin, Glass, PD7230, Christine, Glass, PD7279, Martin, Gonzales, PD7262, Bethany, Goodacre, PD6832, Scott, Goodacre, PD6925, Lee, Graham, PD7113, Troy, Green, PD6920, Lynn, Greenhalgh, PD7027, Eunice, Grieveson, PD7003, Amanda, Grieveson, PD7039, Angela, Griffin, PD7251, Michael, Groody, PD7126, Stephen, Hagel, PD7226, Christine, Hall, PD7011, David, Hann, PD6984, Gerard, Hannan, PD7096, Jamie, Hardy, PD7199, Pauline, Harker, PD7135, Paul, Harker, PD7141, Linda, Harland, PD7187, Harry, Harmer, PD6995, Norma, Harrison, PD7132, Shirley, Harrison, PD7212, Linda, Hedley, PD7064,</p>													<p>green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	

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Christopher, Heron, PD7285, Gillian, Hesler, PD7016, Catherine, Heslop, PD7206, Dorothy, Hill, PD7125, Peter, Hill, PD7127, Joseph, Holt, PD6950, Lyndsey, Hood, PD8480, Ann, Hood, PD7110, Carl, Hoole, PD6983, Ann, Hooper, PD7149, Esther, Howard, PD7195, Jack, Howe-Gingell, PD7257, Carol, Humphrey, PD7058, Alison, Humphrey, PD7059, Brian, Hunter, PD7029, Ann, Huntley, PD7278, Lesley anne, Ingleby, PD7228, Sarah, Irving, PD6957, Henry, James, PD7072, Neitsa, Jenkins, PD7189, Debra, Jobling, PD7044, Ben, Johnson, PD7061, Paula, Johnson, PD7002, Brenda, Johnson, PD7209, David Alan, Johnston, PD7102, Leslie, Johnston, PD7112, Linda, Johnston, PD7114, Pauline, Johnston, PD7089, Cara Louise, Keeling, PD6932, Lisa, Kellett, PD7264, Valerie, King, PD7181, Arnold, Kitching, PD7026, Maria, Kitching, PD7082, Allison, Knight, PD6831, Amy, Lappin, PD6981, Guy, Laverick, PD7066, Florence, Leggoe, PD7076, Deborah, Leung, PD7078, Shaun, Lewins, PD6913, Barbara, Liddle, PD6999, Dawn, Lindsley, PD7280, Paul, Lindsley, PD7282, Simon, Lindsley, PD7281, John, Lindsley, PD7283, Marilyn, Lindsley, PD7287, Denise, Lomax, PD6810, Alex, Lomax, PD6841, Kim, Lomax, PD7120, Adam, Lomax, PD7155, Margaret, Long, PD7150, Doreen, Lowes, PD7077, Edward, Lowes, PD7133, Paul, Lowson, PD7236, Valerie, Lowson, PD7237, Laura, Luke, PD7250, Dorothy, Lumley, PD6991, Peter, Lynn, PD6923, Victoria, Marland, PD7218, Craig, Marley, PD6953, Catherine, Marley, PD7080, Vivienne, Marley, PD7245, Pam, Marlow, PD7020, Anthony, Martin, PD7154, Helen, Mason, PD7037, Susan, Mason, PD7227, Katherine, Mason-Gage, PD6990, Pauline, McArdle, PD7214, Ross, McGorman, PD6764, Anne, McGorman, PD6927, Christopher, McKie, PD7233, Jonathan, McLean, PD7274, Emma, McLean, PD7276, Gloria, McLeary, PD7252, Lauren, McNeill, PD6844, Georgia Eve, McVaigh, PD7156, Robert, Metcalf, PD6908, Alan, Metcalf, PD6958, Dawn, Miller, PD6827, Cameron, Miller, PD7100, John, Milner, PD6814, Ann, Milner, PD7094, James, Milner, PD7111, Holly, Milner, PD7225, Lindsey, Milner, PD7267, Rosie, Milner, PD6811, Aron, Mistry, PD6970, Derek, Moon, PD7004, Anne, Moore, PD7268, Fred, Moralee, PD7067, Linda, Morley, PD6817, Linda, Morley, PD8516, John, Morley, PD6821, Hazel, Munro, PD6959, Gavin, Nichols, PD6934, Maureen, Oliver, PD7012, Maria, O'Neill, PD7210, Mark, Oxlee, PD7235, Louise, Paisley, PD7073, Wendy, Parkin, PD7097, Deidre, Passmore, PD7269, Jennifer, Patterson, PD7129, Mark, Pelley, PD7054,														

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Beth, Penny, PD6836, Ashley, Penny, PD7222, Michael, Philliskirk, PD6940, Alice, Potts, PD7272, Brian, Quinn, PD7244, Christie, Rae, PD7038, Gordon, Raine, PD7057, Paul, Raine, PD7234, Janice, Ramshaw, PD7008, Katherine, Ramshaw, PD7007, Megan Claire, Rayner, PD7081, Teresa, Rayner, PD7087, Yvonne, Reed, PD7246, Alan, Reed, PD8496, Peter, Richardson, PD7053, Claire, Robertson, PD6839, Linda, Robson, PD7084, Ann, Robson, PD7098, Nicola, Rochelle, PD7266, Carol, Rutter, PD7168, Raymond, Rutter, PD7131, Graham, Shelley, PD6926, Russell, Simpson, PD7047, Edward, Smith, PD7028, Terry, Smith, PD7041, Kieran, Smith, PD8112, Jill, Somerville, PD7220, Arthur, Speck, PD7284, Kevin Michael, Spiland, PD6931, Simon, Sproat, PD6804, Paula, Stedham, PD6962, Kevin, Stewart, PD7090, Lyn, Stewart, PD7091, Joyce, Stokoe, PD7014, Paul John, Stronach, PD6980, Steve, Stronach, PD6988, Joanne, Stronach, PD7013, Christine, Stronach, PD7015, Paul, Stronach, PD7083, Stephen, Stronach, PD7207, Anthony, Stronach, PD7143, Karen, Stronach, PD7147, Rose, Stronach, PD7172, Maureen, Stronach, PD7176, Grace, Sykes, PD7193, Marivsz, Szpir, PD6924, Anne, Ternent, PD7046, Daniel, Ternent, PD7048, Kelly, Terry, PD7117, Amy, Thompson, PD6986, Thora, Thompson, PD7122, Finnley, Thompson, PD7160, Ross, Thompson, PD7261, Jack, Thomson, PD7051, John, Thurlbeck, PD6976, Elizabeth, Towers, PD7196, Kerry, Trotter, PD7248, Sarah, Troup, PD7063, John, Wallace, PD7031, Catherine, Wanless, PD7194, Michael, Waters, PD6971, Michelle, Waterson, PD6943, Lynda, Watson, PD6773, Peter, Watson, PD6772, Linda, Watson, PD6996, Maureen, Watson, PD7108, Haydn, Watson, PD7009, Lynn, Watson, PD7109, Pauline, Welbon, PD7119, Charles, Welbon, PD7123, Reginald, Whitaker, PD7022, Lyne, Whiteford, PD7178, Nigel, Williams, PD6973, David, Williamson, PD8486, Kate, Williamson, PD8488, Lynn, Williamson, PD8487, Jennifer, Wilson, PD7116, Kirsty, Wilson, PD7118, Ryan, Wilson, PD7163, Gavin, Wilson, PD7165, Jack, Wilson, PD7167, Steven, Wilson, PD7271, Stacey, Winter, PD7075, Janice, Worthington, PD7030, George, Worthington, PD7275, Maxine, Young, PD7263,																
Jordon, Adams, PD6939 Darren, Adamson, PD6754 Callum, Aitken, PD6645 Malcolm, Aitken, PD6532 Gary, Allan, PD6642 Beverley, Allan, PD6650 Leslie, Allan, PD6647 Julie, Allison, PD6685 Megan, Anderson, PD6479 Christine, Angus, PD6692 Claire, Appleby, PD6874 Kathryn, Armstrong, PD6787 Sharon, Badresingh, PD6732 Wayne, Badresingh, PD6711 Gavin, Bainbridge, PD6883				Policy	SS7	Object	Object to the policy on the grounds that it is not consistent with national policy which requires that a plan must identify infrastructure needs. The Plan does identify some of the infrastructure problems correctly but they are not addressed. The Plan is unsound as it is not	Object to the policy on the grounds that it is not consistent with national policy which requires that a plan must identify infrastructure needs. The Plan does identify some of the infrastructure problems correctly but they are not addressed. The Plan is unsound as it is not		Object to the policy on the grounds that it is not consistent with national policy which requires that a plan must identify infrastructure needs. The Plan does identify some of the infrastructure problems correctly but they are not addressed. The Plan is unsound as it is not		Site HGA9 should be removed from the Plan	The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		

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Karen, Bambrough, PD6584 David, Barkess, PD6736 Darren, Barkess, PD6743 Diane, Barkess, PD8502 Colin, Barnes, PD6641 Susan, Barnes, PD6661 Ruth, Barnsley, PD6696 Sarah, Barrass, PD6504 Steven, Barrass, PD6506 Mary A, Barron, PD6637 Maria, Barry, PD6556 Kevin, Batters, PD6735 Sylvia, Batters, PD6819 Fred, Batton, PD6909 Lydia, Baxter, PD6848 Annmarie, Beckwith, PD6484 Rose, Beeston, PD6539 Barbara, Bennison, PD6563 J. Betts, PD6526 Ashley, Bingham, PD6542 Anne, Bingham, PD6536 Louise, Black, PD6653 Jean, Blanckley, PD6523 Ian, Blanckley, PD6522 Brian, Blanckley, PD6778 Wendy, Blanckley, PD8128 Hannah, Blanckley, PD8130 Sandra, Blench, PD6613 Ashley, Bolton, PD8454 Kenneth, Bowen, PD6638 Pauline, Bradley, PD8457 Liam, Brady, PD6755 Jamie, Broadbent, PD8464 Christine, Brough, PD6674 Margaret, Brown, PD6610 Stephen, Brown, PD8157 Julie, Burdett, PD6577 Anthony, Burdett, PD6569 Stewart, Bywater, PD6576 Gemma, Campey, PD6559 Hayley, Carney, PD6728 Henry, Carney, PD6775 Kathleen, Carney, PD6727 Linda, Casey, PD6499 Rebecca, Chapman, PD6876 Dorothy, Charlesworth, PD6707 David, Charlton, PD6731 Malcolm, Clark, PD6857 Peter, Clements, PD6666 Leeann, Collings, PD6835 Ian, Collings, PD6892 Michelle, Collins, PD6520 John, Collinson, PD6574 Deborah, Collinson, PD6573 Angela, Coombs, PD8465 Paula, Cosgrove, PD6790 Joan, Cosgrove, PD6793 Alison, Cowley, PD6854 Beverley, Craig, PD6849 Brandon, Craig, PD6483 Anita, Cutts, PD6780 George, Dagg, PD6651 Thompson, Dave, PD6510 Jean, Davis, PD6682 Linda, Davis, PD6681 Gavyn, Davis, PD6779 Paul, Davis, PD6783 David, Davison, PD6689 Carole, Dawson, PD6845 david, dean, PD6893 annette, dean, PD6894 Pamela, Dennis, PD6475 Andrew, Devlin, PD6683 Anita, Dickinson, PD6476 Graeme, Dickinson, PD6560 Kathryn, Dickman, PD6517 Lynn, Dinsdale, PD6716 Kevin, Dinsdale, PD6800 Rebecca, Dinsdale, PD6795 June, Dinsmore, PD6514 Jessica, Dinsmore, PD6581 Jean, Dixon, PD6851 Joy, Dixon, PD8466 Peter, Dobson, PD6861 Eleanor, Dover, PD8126 Jess, Dresser, PD6589 Phyllis Ann, Duffy, PD6639 Jordan, Dunn, PD6834 Lisa, Edwards, PD6675 Jennifer, Elliott-Farrow, PD6740 Callie, Elliott-Farrow, PD6741 Joan, Emerson, PD8468 Lorraine, Emerson-Broadbent, PD8467 Nicole, Engleby, PD6538 Christine, Engleby, PD6781, John, Evans, PD6565 Susan, Evans, PD6575 Robin, Everett, PD6884, Joan, Everett, PD6885, Natalie, Ewing, PD8537, Keith, Farrow, PD6595, Janice, Farrow, PD6631,						supported by an Infrastructure Plan.	supported by an Infrastructure Plan.			supported by an Infrastructure Plan.			<p>developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>With reference to drainage, the Policy stipulates that development should "mitigate any surface water flooding impacts and incorporate appropriate water attenuation in relation to flood zones associated with Herrington Burn. The development control process would ensure that any consent given for the development of the site would address any potential flooding and drainage issues, regardless of whether this extra emphasis was given in the policy wording or not.</p> <p>Further justification can be found in the Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	

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Ella, Fielding, PD6619, Joyce, Finley, PD6706, Mary Silvia, Forbes, PD6701, Cherie, Foster, PD6570, Terence, Foster, PD6629, Brian, Frankum, PD6889, Lorraine, Frost, PD6725, Jamie, Gaines, PD6590, Brett, Gallon, PD6540, Tim, Gallon, PD6733, Colin, Garbutt, PD6723, Elizabeth, Gardener, PD6734, Lorna, Gatenby, PD6809, Ian, Gaunt, PD6627, Norman, Gawthorpe, PD6477, Ross, Gawthorpe, PD6488, Patricia, Gawthorpe, PD6596, Kathleen, Gibson, PD6528, Christine, Glass, PD6525, Robin, Glass, PD6550, Martin, Gonzales, PD6879, Scott, Goodacre, PD6503, Bethany, Goodacre, PD6579, Lee, Graham, PD6502, Troy, Green, PD6625, Lynn, Greenhalgh, PD6554, Amanda, Grieveson, PD6527, Eunice, Grieveson, PD6672, Angela, Griffin, PD6712, Michael, Groody, PD6602, Stephen, Hagel, PD6623, Christine, Hall, PD6482, David, Hann, PD6897, Gerard, Hannan, PD6896, Jamie, Hardy, PD6649, Pauline, Harker, PD6615, Paul, Harker, PD6768, Linda, Harland, PD6808, Harry, Harmer, PD6614, Shirley, Harrison, PD6855, Norma, Harrison, PD6820, Moira, Hartburn, PD6796, John, Hawthorne, PD6612, Dean, Hawthorne, PD6616, David, Hawthorne, PD6786, Sharon, Hawthorne, PD6799, Sonia, Hawthorne, PD8469, Linda, Hedley, PD6587, Christopher, Heron, PD6873, Amanda, Heron, PD6679, Catherine, Heslop, PD6791, Dorothy, Hill, PD6485, Peter, Hill, PD6853, Donna, Hitcham, PD6534, Stuart, Hitcham, PD6794, Joseph, Holt, PD6662, Sally, Holt, PD6823, Nathan, Holt, PD6767, Janet, Holyoak, PD6815, David, Holyoak, PD6818, Ann, Hood, PD6652, Lyndsey, Hood, PD6636, Carl, Hoole, PD6718, Ann, Hooper, PD6719, Esther, Howard, PD6597, Jack, Howe-Gingell, PD6937, Evelyne, Hudson, PD6496, Alison, Humphrey, PD6722, Carol, Humphrey, PD6708, Brian, Hunter, PD6788, Ann, Huntley, PD6678, Tracey, Hutchinson, PD6509, Lesley anne, Ingleby, PD6582, David, Jackson, PD6774, Henry, James, PD6690, Neitsa, Jenkins, PD6867, Gary, Jessop, PD6784, Debra, Jobling, PD6586, Ben, Johnson, PD6497, Paula, Johnson, PD6698, Brenda, Johnson, PD6798, Linda, Johnston, PD6487, Leslie, Johnston, PD6490, David Alan, Johnston, PD6500, Pauline, Johnston, PD6739, Wendy Ann, Jones, PD6699, David, Jones, PD6822, Cara Louise, Keeling, PD6519, Lisa, Kellett, PD6580, Valerie, King, PD6721, Arnold, Kitching, PD6658, Maria, Kitching, PD6738, Amy, Lappin, PD6724, Guy, Laverick, PD6945, Florence, Leggoe, PD6882, Deborah, Leung, PD6875, Shaun, Lewins, PD6495, Barbara, Liddle, PD6901, Simon, Lindsley, PD6644, Paul, Lindsley, PD6655, Marilyn, Lindsley, PD6862, Dawn, Lindsley, PD6868,														

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<p>John, Lindsley, PD6864, Alex, Lomax, PD6700, Kim, Lomax, PD6833, Denise, Lomax, PD6824, Adam, Lomax, PD6828, Margaret, Long, PD6713, Edward, Lowes, PD6561, Doreen, Lowes, PD6664, Paul, Lowson, PD6592, Valerie, Lowson, PD6591, Laura, Luke, PD6557, Dorothy, Lumley, PD6656, Peter, Lynn, PD6871, Maureen, Maddison, PD6553, Victoria, Marland, PD6886, Catherine, Marley, PD6640, Vivienne, Marley, PD6609, Craig, Marley, PD6750, Pam, Marlow, PD6759, Anthony, Martin, PD6541, Helen, Mason, PD6846, Katherine, Mason-Gage, PD6646, Pauline, McArdle, PD6856, Ross, McGorman, PD6626, Anne, McGorman, PD6859, Christopher, McKie, PD6858, Jonathan, McLean, PD6603, Emma, McLean, PD6604, Gloria, McLeary, PD6667, Lauren, McNeill, PD6585, Georgia Eve, McVaigh, PD6910, Simon, Mears, PD6785, Robert, Metcalf, PD8512, Alan, Metcalf, PD6705, Scott, Metcalfe, PD6512, Hilary, Metcalfe, PD6518, Dawn, Miller, PD6516, Cameron, Miller, PD6948, Rosie, Milner, PD6635, Holly, Milner, PD6606, John, Milner, PD6634, James, Milner, PD6748, Lindsey, Milner, PD6747, Ann, Milner, PD6749, Lynn, Minnican, PD8164, Alan, Minnican, PD8162, Kim, Minshall, PD6617, Aron, Mistry, PD6566, Derek, Moon, PD6521, Anne, Moore, PD6654, Fred, Moralee, PD6714, John, Morley, PD6605, Christopher, Morton, PD6691, Hazel, Munro, PD6847, Gavin, Nichols, PD6535, Maureen, Oliver, PD6668, Maria, O'Neill, PD6657, Mark, Oxlee, PD6860, Louise, Paisley, PD6870, David, Parkin, PD6761, Wendy, Parkin, PD6902, Deidre, Passmore, PD6881, Jennifer, Patterson, PD6507, Chris, Peart, PD6676, Mark, Pelley, PD6880, Beth, Penny, PD6601, Ashley Penny, PD6624, Brian, Peverley, PD6677, Michael, Philliskirk, PD6813, Maurice, Plews, PD6511, Gaynor J, Plews, PD6515, Lyndsay, Plews, PD6801, Stephen, Plews, PD6555, Alice, Potts, PD6752, Brian, Quinn, PD6578, Christie, Rae, PD6493, Sheila, Raine, PD6693, Paul, Raine, PD6888, Steven, Raine, PD6763, Annette, Raine, PD6825, Gordon, Raine, PD6890, Janice, Ramshaw, PD6494, Katherine, Ramshaw, PD6621, Anthony aLAN, Ramshaw, PD6744, Helen, Rashad, PD6546, Teresa, Rayner, PD6687, Megan Claire, Rayner, PD6684, Mary, Redhead, PD6593, Yvonne, Reed, PD6630, David, Reed, PD6826, Alan, Reed, PD8470, Peter, Richardson, PD6878, Kristian, Roberts, PD6486, Malcolm, Robertson, PD6622, Andrew, Robertson, PD6697, Linda, Robson, PD6872, Ann, Robson, PD6903, Nicola, Rochelle, PD6607, D, Russell, PD6850, Raymond, Rutter, PD6549, Carol, Rutter, PD6562, Glen, Sayer, PD6789,</p>														

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Graham, Shelley, PD6904, Russell, Simpson, PD6543, Philip, Simpson, PD6492, Diane, Simpson-Scott, PD6564 Susan, Sims, PD6508, Nicola, Sims, PD6746, Terry, Smith, PD6530, Deborah, Smith, PD6680, Kieran, Smith, PD6663, Edward, Smith, PD6866, Arthur, Speck, PD6648, Kevin Michael, Spiland, PD6906, Carole, Spraggon, PD6877, Simon, Sproat, PD6843, Maureen, Stanley, PD6524, Paula, Stedham, PD6505, Derek, Stenger, PD6766, Lisa, Stenger, PD6765, Lyn, Stewart, PD6611, Kevin, Stewart, PD6633, Joyce, Stokoe, PD6852, Karen, Stronach, PD6694, Steve, Stronach, PD6702, Anthony, Stronach, PD6659, Stephen, Stronach, PD6665, Christine, Stronach, PD6669, Rose, Stronach, PD6715, Paul, Stronach, PD6726, Maureen, Stronach, PD6703, Joanne, Stronach, PD8535, Paul John, Stronach, PD6552, Grace, Sykes, PD6710, Marivsz, Szpir, PD6869, Anne, Ternent, PD6588, Daniel, Ternent, PD6583, Kelly, Terry, PD6513, Steven, Thompson, PD6529, Michael, Thompson, PD6533, Thora, Thompson, PD6686, Emma, Thompson, PD6792, Amy, Thompson, PD6899, Ross, Thompson, PD6863, Finnley, Thompson, PD6865, Jack, Thomson, PD6942, John, Thurlbeck, PD6762, Elizabeth, Towers, PD6608, Christine, Trotter, PD6688, Kerry, Trotter, PD6594, Sarah, Troup, PD6501, Deo, Trueman, PD6478, Lynda, Usher, PD6620, Peter, Vasey, PD6531, Anne, Vasey, PD6548, June, Vincent, PD6545, Alan, Vincent, PD6547, John, Wallace, PD6837, Catherine, Wanless, PD6673, Michael, Waters, PD6558, Michelle, Waterson, PD6618, Peter, Watson, PD6551, Maureen, Watson, PD6498, Linda, Watson, PD6709, Lynn, Watson, PD6671, Lynda, Watson, PD6695, Haydn, Watson, PD8532, Charles, Welbon, PD6489, Pauline, Welbon, PD6491, Reginald, Whitaker, PD6895, Stephen, White, PD6537, Amanda, White, PD6544, Lyne, Whiteford, PD6717, Nigel, Williams, PD6806, Scott, Williams, PD6742, Lindsay, Williams, PD6737, Jennifer, Wilson, PD6758, Steven, Wilson, PD6760, Ryan, Wilson, PD6729, Gavin, Wilson, PD6745, Kirsty, Wilson, PD6751, Jack, Wilson, PD6753, Stacey, Winter, PD6887, Janice, Worthington, PD6730, George, Worthington, PD6670, Maxine, Young, PD6660, Philip, Young, PD6812, Marie-Claire, Young, PD6816,																
Trevor, Dargan, PD287				Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that the proposals would lead to urban sprawl and would not be consistent with the National Planning Policy Framework. Building houses on this area of Outstanding Natural Beauty does not constitute exceptional or very	Site HGA9 should be removed as a proposed housing site and retained as Green Belt land.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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											special circumstances.		Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further details regarding greenfield land impact and landscape are included in the Compliance Statement (see HGA9, Policy SS7).	
Kathryn, Armstrong, PD6992 David, Barkess, PD7256 Diane, Barkess, PD7270 Darren, Barkess, PD7277 Ruth, Barnsley, PD6933 Sarah, Barrass, PD7288 Steven, Barrass, PD7290 Kevin, Barry, PD6568 Barbara, Bennison, PD6994 Jean, Blanckley, PD7240 Brian, Blanckley, PD7254 Wendy, Blanckley, PD7292 Hannah, Blanckley, PD7241 Ian, Blanckley, PD7243 Sandra, Blench, PD7021 Ashley, Bolton, PD8489 Pauline, Bradley, PD8481 Jamie, Broadbent, PD8504 Anthony, Burdett, PD7215 Henry, Carney, PD7024 Kathleen, Carney, PD7153 Paula, Cosgrove, PD8167 Joan, Cosgrove, PD8491 Anita, Cutts, PD7065 Thompson, Dave, PD7166 Joan, Emerson, PD8494 Natalie, Ewing, PD8536 Moira, Hartburn, PD7192 David, Hawthorne, PD7086 Sharon, Hawthorne, PD7142 Sonia, Hawthorne, PD8495 Dean, Hawthorne, PD7197 John, Hawthorne, PD7198 Stuart, Hitcham, PD7105 Donna, Hitcham, PD7139 Nathan, Holt, PD6989 Sally, Holt, PD7171 Janet, Holyoak, PD7124 David, Holyoak, PD7134 Evelynne, Hudson, PD7071 Tracey, Hutchinson, PD6967 David, Jackson, PD7202 Gary, Jessop, PD7140 Wendy Ann, Jones, PD6964 David, Jones, PD6965 Maureen, Maddison, PD8511 Simon, Mears, PD7213 Scott, Metcalfe, PD6952 Hilary, Metcalfe, PD6954 Lynn, Minnican, PD8165 Alan, Minnican, PD8161 Kim, Minshall, PD7137 Christopher, Morton, PD7151 David, Parkin, PD7018 Luke, Pearson, PD8138 Chris, Peart, PD7217 Brian, Peverley, PD7221 Maurice, Plews, PD7010 Lyndsay, Plews, PD7070 Stephen, Plews, PD7017 Gaynor J, Plews, PD7161 Sheila, Raine, PD7146 Steven, Raine, PD7232 Annette, Raine, PD7216 Anthony aLAN, Ramshaw, PD7005 Helen, Rashad, PD7104 David, Reed, PD7239 Kristian, Roberts, PD7148 Andrew, Robertson, PD6938 Malcolm, Robertson, PD7224 Myra, Scott, PD8154 Nicola, Sims, PD7085 Susan, Sims, PD7238 Deborah, Smith, PD7019 Maureen, Stanley, PD7289 Lisa, Stenger, PD6975 Derek, Stenger, PD7186 Michael, Thompson, PD7106 Steven, Thompson, PD7164 Emma, Thompson, PD7174 Christine, Trotter, PD7180 Lynda, Usher, PD7185		Policy	SS7	Object		Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.	Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.			Object to the way the site have been selected for inclusion in the Plan as this is not consistent with the NPPF. The Council has not considered all alternative such as Brownfield sites. There has been a lack of transparency why sites have been selected and why sites have been consulted on. The road network cannot support further development, especially the development of HGA9.		Policy SS7 should delete the reference to site HGA9.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Anne, Vasey, PD7103 Peter, Vasey, PD7107 June, Vincent, PD7128 Alan, Vincent, PD7130 Amanda, White, PD7034 Scott, Williams, PD7260 Lindsay, Williams, PD7265 Philip, Young, PD7175 Marie-Claire, Young, PD7177														contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in the Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.		
Amy F	Ward	Barratt David Wilson Homes	PD5309	Policy	SS7	Object		Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.			Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Barratt David Wilson Homes (BDW) do not support the approach of site specific policies in the Plan and their interaction with other policies. They are concerned that this could hinder the potential delivery of the proposed housing allocations and undermine viability. Therefore the housing requirement should be increased to ensure the delivery of the OAN is a minimum.	Incorporate a flexible approach to housing deliver and increase the housing requirement.	The site specific policies have been developed to ensure the right types of homes are delivered in these greenfield, peripheral locations which will contribute towards meeting the overall housing needs of the city, making best use of the available sites and locations and protecting the existing environment and in some cases sensitive locations. The Council considers that the level of detail is appropriate and the approach is sound, enabling in particular that a number of sensitive site issues are identified and addressed, and specifically addressed at the planning application stage. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens	PD4667	Policy	SP6	Support with mods							Broad support for policy but would oppose inclusion of Settlement Breaks and oppose Policy NE7. Also request that consultee's site at Broomhill is removed from Settlement Break.	No modifications proposed to this policy.	The Council has set out its Settlement Break approach and methodology in the Compliance Statement (Policy SP1 Spatial Strategy). Policy SP6 (The Coalfield) provides more context, as well as specific comments for the Broomhill site. The Council does not support the Broomhill site (SHLAA site 536) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 16) this site (represented by field parcel 2) provides strong Settlement Break purpose, acting as a green wedge and retaining an impression of separateness and distinctiveness between Houghton and Hetton. The site supports the wider Green Infrastructure and wildlife corridor that runs to the east of Houghton and Hetton, as well as supporting the west-east corridor that follows the Rough Dene Burn. The Burn runs immediately to the north of the site and is a protected wildlife site, including Ancient Semi-Natural Woodland. The western edge of this site forms the revised Settlement Break boundary, which follows a distinctive topographical divide, and also follows the eastern boundary of a former Settlement Break site that now has planning approval. The SHLAA provides more specific constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 180-181), highlighting that the site consists of undulating topography that provides quality natural greenspace, and is subject to past landfill.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Walters	National Trust	PD4022	Policy	SS7	Object	Concern is maintained regarding the impact of HGA9 on the potential encroachment of the setting of the monument and effects of increasing urbanisation in this location. However, the reference in criterion iv to respecting the views and setting of Peshaw Monument is welcome. To fully comply with 1990 Planning Act, criterion iv must						Criterion iv must make clear that the requirement to respect views and setting of the monument applies to the development as a whole rather than simply the boundary design. The parameters for development should also make clear that a full heritage impact assessment is provided.	The Council has set out a response in relation to this site in the Compliance Statement (see Policy SS7 The Coalfield Housing Growth Areas), and includes full liaison with Historic England. The Council does not consider that policy amendment is required, and having undertaken further consultation with Heritage Officers and Historic England, considers that full design impacts can be evaluated in detail at the application stage and in liaison with key organisations and in association with statutory guidance and acts as necessary.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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							make clear that the requirement to respect views and setting of the monument applies to the development as a whole rather than simply the boundary design.								
Margaret	Webb		PD8442	Policy	SS7	Object						Concern that development would generate additional vehicles use on the A183 which is already congested at peak times.	Do not build on the Green Belt.	The Transport Assessment has assessed the impacts of the Plan on the Local Road Network. The Council considers the Plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Edgar		PD120	Policy	SS7	Object			Considers that the policy is not effective.			Considers that the policy is not justified as the environmental report is not being undertaken until Nov 2018, however the plan is progressing on the basis that not expecting anything to stop the development within the report.	The environmental report needs to be undertaken before the plan goes to the next stage.	The developer has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WYNARD HOMES		Wynard Homes	PD4696	Policy	SS7	Object		Concerned that the Council is over-relying on brownfield sites, which may not come forward for development due to constraints. Site at Quarry House Lane should be allocated for residential development. There is a typographical error at the end of the policy which ends with the word and.			Concerned that the Council is over-relying on brownfield sites, which may not come forward for development due to constraints. Site at Quarry House Lane should be allocated for residential development. There is a typographical error at the end of the policy which ends with the word and.	Concerned that the Council is over-relying on brownfield sites, which may not come forward for development due to constraints. Site at Quarry House Lane should be allocated for residential development. There is a typographical error at the end of the policy which ends with the word and.	Allocate site at Quarry House Lane for residential development.	The brownfield sites included within the SHLAA are considered deliverable or developable based on the most up to date evidence available. The site referenced within the representation at Quarry House Lane is within the settlement break and as such is to be retained for such purposes. Policy SS7 includes references to the HGA's and as such the word 'and' following point 3 is intentional.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Foster		PD301	Policy	SS7	Object		Considers policy SS7 is not positively prepared.	Considers policy SS7 is not effective.		Considers policy SS7 is not consistent with national policy	Considers policy SS7 is not justified. Object to how greenbelt sites have been selected. NPPF states green belt should be protected. No evidence that brownfield has been exhausted. Infrastructure in Penshaw could not cope. Consultation was unclear and not advertised. Housing needs proposed are untrue and long timescales to sell homes. Population is declining, affordable homes are needed.	Amend SS7 as greenbelt deletion not required when evidence is considered appropriately. More work is needed to identify solutions to housing.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The speed of housing development differs from site to site, but the Council's evidence demonstrates an ongoing need and demand for new housing, including within the Coalfield area. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Judith	Laydon		PD409	Policy	SS7	Object		Considers policy SS7, HGA9 not to have been positively prepared due to visual impact, harm to landscape, destroying traditional field patterns, environmental damage. Schools and doctors not being able to cope with extra demand. Impact on Penshaw Monument.					Remove policy and save green belt for future generation. Council to buy land and extend park.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Joan	Harrison		PD348	Policy	SS7	Object						Considers policy SS7 not to be justified.	No Modification proposed.	The Council considers this policy to be sound. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release the housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Fiona	Jackson		PD388	Policy	SS7	Object			Considers policy SS7, in particular HGA9 not to be effective.			Considers policy SS7, HGA9 not to be justified due to being green belt and no infrastructure to support more houses. Brownfield sites should be built on first.	Stop it, build elsewhere, social housing is needed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Oliver	Edgar		PD118	Policy	SS7	Object						Considers policy SS7, in relation to sites HGA9 and HGA10 not to be justified as would not be economically viable and would be detrimental to the local area. Concerns over the lack of demand for houses.	Build in other areas.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The speed of housing development differs from site to site, but the Council's evidence demonstrates on ongoing need and demand for new housing, including within the Coalfield area. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	
Alan	Oliver		PD420	Policy	SS7	Object						Considers policy SS7, HGA9 not to be justified. Defensible green belt boundaries already exist, development will destroy wildlife. Green Belt there for a purpose and cannot be replaced. Development will affect the vistas to and from Penshaw monument. Increase the risk of flooding.	Remove proposal from the plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. The site avoids Flood Zones that exist to the east along Herrington Burn. Flood risk data from the Environment Agency identifies low risk to groundwater flooding and very minor proportion of land affected by surface water flooding. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ronald	Marley		PD413	Policy	SS7	Object		Considers policy SS7, HGA9 not to have been positively				Considers policy SS7, HGA9 not to be justified.	Withdraw plans.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt	The Council considers there have been no soundness or legal

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							prepared.				Development of this site will put increased pressure on services and infrastructure and loss of green belt and wildlife habitat.		boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
David	Sloan		PD582	Policy	SS7	Object		Considers policy SS7, HGA9 not to be positively prepared.	Considers policy SS7, HGA9 not to be effective as it does not create jobs, sustainable communities, transport or infrastructure and facilities.		Considers policy SS7, HGA9 not to be consistent with national policy.	Considers policy SS7, HGA9 not to be justified. Current sites under construction or with permission will increase pressure on existing services and infrastructure. The plan does not take into account housing growth plans on the Durham boundary which are in the green belt. This reduces settlement break. The council raised the same objections as above to the development.	Revise plan to include actual improvements to infrastructure and services. HGA9 should be removed as is vital greenbelt. OAN is variable as it is based on broad assumptions of growth and employment.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kathleen	Marley		PD412	Policy	SS7	Object		Considers policy SS7, HGA9 is not positively prepared.				Considers policy SS7, HGA9 not to be justified. Evidence for extra housing is not strong. Concerns over overstretching existing facilities unnecessarily when there are 3000 empty homes in Sunderland. House prices in the area are falling. This is a Green belt area and there is not much in Sunderland.	Do not build on green belt. Houses would spoil the monument.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Jennie	Shotton		PD133	Policy	SS7	Object		Considers policy SS7, HGA9 not to be positively prepared.			Considers policy SS7, HGA9 not to be consistent with national policy. No exceptional circumstances for using green belt land.	Considers policy SS7, HGA9 not to be justified as need to fully investigate the potential 3,000 empty properties in Sunderland and surrounding area.	Council should use the land to extend the park. Need to concentrate efforts on cleaning up the city.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													<p>to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed</p>	

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														Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Paul	Dixon	Highways England	PD4846	Policy	SS7	Object			Highways England consider the Plan not sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			Highways England consider the Plan not sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No modifications proposed.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential.

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															<u>Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</u>
Taylor Wimpey		Taylor Wimpey	PD3507	Policy	SP6	Support with mods						Justified to release land in Green Belt as there is limited capacity within the urban area, and agrees with paragraph 4.64 that the Housing Growth Areas will "support the sustainable growth of the Coalfield". Minor boundary amendment required to HGA9 to follow recognisable physical features. Also requests that Policy SP6(2) is amended to include the release of land east of Seaham Road, Houghton from Green Belt. This is justified because Houghton acts as the principal settlement in the sub-area and that there is limited available land in Houghton available for development. If this approach is not supported, it is requested that the site be safeguarded (Policy SS3). Further details are provided to support the case for the site's inclusion.	Minor boundary required to HGA9 to ensure that boundary follows physical features that are readily recognisable. Proposes amendment to SP6(2) to include land east of Seaham Road, Houghton-le-Spring, or failing that, for the land to be safeguarded.	The Council has considered the eastern boundary to HGA9 and considered that a new alignment is necessary so that the entire site can avoid Flood Zones 2 and 3, which thereby enables the site to adhere to a stipulated requirement made by the Environment Agency. Regarding land east of Seaham Road, the reasons for not supporting this proposal are as follows. The Green Belt Assessment Stage 1 Updated and Stage 2 report confirms (p107) that the impacts to Green Belt purpose are moderate (particularly in relation to urban sprawl and countryside encroachment). In addition, the Green Belt Boundary Assessment (p38-39) confirms that the area performs an important role in preventing Sunderland to the east from merging with Houghton-le-Spring to the west and supports major green infrastructure corridors. It concludes that "there is no basis to make any strategic boundary changes to this part of Sunderland's Green Belt." More specifically, Seaham Road provides a strong, defensible and well-defined boundary, and supports a logical eastern boundary to the Houghton-Hetton built-up area. Furthermore, this Green Belt is identified in the Sunderland Landscape Character Assessment to be of higher landscape value that should be protected, and forms an important part of a district-wide wildlife and Green Infrastructure corridor that links to the River Wear to the north, and southwards into County Durham. The site is also assessed at Stage 3 Green Belt Site Selection Report (p83) which confirms that the site is not suitable due to the reasons outlined above.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Arlene	Pearson		PD421	Policy	SS7	Object			Considers policy SS7, HGA9 not to be effective.			Considers policy SS7, HGA9 not to be justified. More homes needed but not at expense of green belt and without road infrastructure. The existing green belt works well. Leave floods to soak up water.	No plans to build extra facilities or infrastructure. Empty housing land, brownfield land could help to city's housing problem.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. The site avoids Flood Zones that exist to the east along Herrington Burn. Flood risk data from the Environment Agency identifies low risk to groundwater flooding and very minor proportion of land affected by surface water flooding. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.</p>	
Ray	Delaney		PD30	Policy	SP6	Object			Mr Delaney suggest a number of modifications to make the policy sound. This includes the removal of the		Mr Delaney suggest a number of modifications to make the policy sound. This includes the removal of the	Mr Delaney suggest a number of modifications to make the policy sound. This includes the removal of the	Mr Delaney suggest a number of modifications to make the policy sound. This includes the removal of the	The Council does not support the minor policy modifications - the term "settlement" is deemed relevant, in that the policy wishes to 'protect Coalfield settlements' whilst ensuring their future sustainability. The term	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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									word Settlement from the first sentence, the removal of inappropriate development in criterion 1 and a new criterion should be added which allocates site 464B for residential development. The reference to inappropriate should not be applied as this was discussed at the Stockton EIP.		word Settlement from the first sentence, the removal of inappropriate development in criterion 1 and a new criterion should be added which allocates site 464B for residential development. The reference to inappropriate should not be applied as this was discussed at the Stockton EIP.	word Settlement from the first sentence, the removal of inappropriate development in criterion 1 and a new criterion should be added which allocates site 464B for residential development. The reference to inappropriate should not be applied as this was discussed at the Stockton EIP.	word Settlement from the first sentence, the removal of inappropriate development in criterion 1 and a new criterion should be added which allocates site 464B for residential development.	'inappropriate development' is used in the context of policies NE7 and NE8, which details appropriate and inappropriate forms of development in these areas, and is therefore retained. Site 464B at Offerton is not supported- the site is now considered to constitute greenfield land whereas the previous assessment considered the site to be brownfield land. Supporting the removal of this site from the Green Belt would require major alteration to the city's Green Belt boundary (removing existing strong and durable boundaries), and such boundary alteration cannot be justified. It should be noted that the assessment in this addendum supersedes the assessment contained within the Green Belt Assessment Stage 1 Updated and Stage 2 (2017) in relation to this site.	require modifications to the Plan. Therefore no modifications are proposed.
John	Stoker		PD610	Policy	SS7	Object					Not consistent with Paragraphs 79-92 of the National Planning Policy Framework.		No modifications proposed.	The Council notes this representation. As stated in the Compliance Statement and the Exceptional Circumstance Report the Council consider that is necessary to amend the Green Belt boundary and allocate land for housing to meet identified needs. The Council is therefore satisfied that the Plan is consistent with Paragraphs 79-92 of the NPPF.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Conlon		PD87	Policy	SS7	Object			Objection on the grounds of protecting the openness, permanence and vistas of Green Belt and that there are no exceptional circumstances to justify building houses in the Green Belt before brownfield land or before using all empty properties.				Remove the policy from the plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Mackings	Paul Mackings Consulting Ltd	PD2953	Policy	SS7	Object		Object to allocation of Sites HGA9, 10 and 11 of Policy SS7 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Object to allocation of Sites HGA9, 10 and 11 of Policy SS7 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.		Object to allocation of Sites HGA9, 10 and 11 of Policy SS7 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Object to allocation of Sites HGA9, 10 and 11 of Policy SS7 on the grounds that the Council has not fully identified all other available and suitable non-Green Belt sites, including former Hendon Paper Mill Site.	Take into account availability of site at Hendon Paper Mill and only make changes to Green Belt if exceptional circumstances can still be justified.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to be retained for employment purposes.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Edgar		PD119	Policy	SS7	Object			Object to development in Green Belt adjacent to country park. Development is not justified as there are brownfield sites available. Concerned about impact on local infrastructure.			Object to development in Green Belt adjacent to country park. Development is not justified as there are brownfield sites available. Concerned about impact on local infrastructure.	Develop on brownfield sites first. Do not use the term Coalfield Area within the Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas,	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Lesley	Emmerson		PD292	Policy	SS7	Object		Considers the policy not to be positively prepared. Object to the way sites have been selected for inclusion in the plan. Green belt should be protected and building on it should be last resort. Do not consider the council have explored all possible alternatives before allocating green belt sites. Lack of transparency over site selection and consultation. Concerns over impact on highway network in developing site HGA9.	Considers the policy not to be effective. Object to the way sites have been selected for inclusion in the plan. Green belt should be protected and building on it should be last resort. Do not consider the council have explored all possible alternatives before allocating green belt sites. Lack of transparency over site selection and consultation. Concerns over impact on highway network in developing site HGA9.		Considers the policy not to be consistent with national policy. Object to the way sites have been selected for inclusion in the plan. Green belt should be protected and building on it should be last resort. Do not consider the council have explored all possible alternatives before allocating green belt sites. Lack of transparency over site selection and consultation. Concerns over impact on highway network in developing site HGA9.		HGA9 Penschaw should be removed from the plan and council identify more suitable sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD613	Policy	SS7	Object						Objects to Penschaw Housing Growth Area as not required to achieve a realistic level of housing development over the plan period.	Amend the boundary of HGA9, new boundary suggested. Reinstate the balance of the site as green belt as part of policy NE6.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP6 The Coalfield), and for HGA9 (see Policy SS7 The Coalfield Housing Growth Areas).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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												Housing development would have an adverse impact on the openness of the location. If the site is required for housing development, suggests a smaller site area which would be less environmentally damaging.			the Plan. Therefore no modifications are proposed.	
John	Tumman	Sunderland Civic Society	PD703	Policy	SS7	Object						Objects to policy SS7, HGA9 Penschaw due to the house building target being over-ambitious and unachievable, suggest there is no numerical requirement for HGA's as such request its deletion from the plan.	Deletion of HGA9 from plan and proposals map. Re-instatement of land as Green Belt.	The Council consider that exceptional circumstances exist which justify an amendment to the Green Belt. Further details are provided within the Exceptional Circumstances report and the Compliance Statement .	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Adam	McVickers	Persimmon Homes (Durham)	PD3935	Policy	SP6	Object						Object to protection of Settlement Breaks in the Coalfield area as currently defined on the Policies Map. Consider that the inclusion of area 5 within the Newbottle and Sedgely sub area (as identified in the Settlement Break Review) is unjustified.	If Settlement Break Policy is to be retained, remove area 5 within the Newbottle and Sedgely sub area from the designation.	The Council does not support the site due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability, availability and achievability. As explained in the Settlement Break Review (Chapter 8) this site (represented by field parcel 5) provides strong Settlement Break purpose, particularly in supporting the wider GI corridors west of Newbottle, and linking to Philadelphia, Shiny Row, Elba Park, Dubmire and Houghton. The site also provides the western landscape setting to the Newbottle Conservation Area, as well as providing grant-aided woodland to the north and acting as a junior sports pitch hub to the south. Further details are provided in SHLAA Appendix P (Coalfield Site Assessments) Report (page 48) indicating that additional constraints include the potential impact to an adjacent Local Wildlife Site and to priority species. The scale of development in the area may also trigger the need for extensive infrastructure funding, particularly in relation to highways and schools. As explained in the narrative to Policy SP1 (above), Settlement Breaks have strong links to the NPPF. Whilst Persimmon Homes contend that the policy is overly restrictive, they have already benefitted from the relaxation of Settlement Break policy on adjacent land at Heritage Green, as well as land at Gillas Lane (Houghton), Redburn Row (Chilton Moor), North Road (Hetton) and the South Sunderland Growth Area, with further potential to develop land at Mulberry Way, Dubmire. These sites broadly equate to over 1,000 homes.		The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1324	Policy	SP6	Object					Object to SP6 (specifically the Green Belt sites HGA9-11) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	Object to SP6 (specifically the Green Belt sites HGA9-11) - exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists. States that the policy does not take account of a 700 house site at Pallion on brownfield land.	All HGAs mentioned in this Policy should be deleted.	The Council also considers that the development of the site is not achievable without major biodiversity mitigation, given the many known biodiversity issues in and around the site. The requirement for IAMP to provide at least 85 hectares of Environmental Land Mitigation Area (ELMA) goes a long way towards proving the biodiversity sensitivity of the area. Priority and protected species are known on site and adjacent to the site (part of their foraging area/buffer zones). Protected wildlife sites also exist adjacent to the site, and the area serves as an important wildlife and GI corridor that connects protected sites on a north-south axis and also supports the River Don corridor to the north. The full mitigation extent is not known without further detailed study, but there is likely to be considerable mitigation required in terms of cost and in terms of land that would need to be safeguarded from future development.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Richard	Cowen	CPRE North East	PD1171	Policy	SS7	Object					Object to SS7 (sites HGA9-11) -	Object to SS7 (sites HGA9-11) -	To delete this policy.	The housing requirement set out within the plan is consistent with the	The Council considers there have been no	

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											exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists.	exceptional circumstances are not justified because the OAN does not comply with the national standard method for calculating OAN, and furthermore that these sites will lead to a weaker boundary being created than currently exists.		Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement. The Council has set out its specific responses relating to the sites HGA9-11 in the Compliance Statement (see Policy SS7).	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Alison	Gregory		PD320	Policy	SS7	Object						Considers policy SS7, in particular site HGA9 not to be justified as the local infrastructure cannot support additional homes. Already significant development in the area. Traffic surveys inadequate. Removal of green belt contravenes national policy. No environmental impact assessment undertaken for the site. The plan should consider brownfield and city regeneration.	SS7 amended to remove HGA9 from the plan. Should identify more suitable brownfield sites and areas adjacent to new road systems and bridge.	The Council considers this policy to be sound. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The Council has prioritised the development of brownfield sites, increased densities and considered the use of empty properties where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Oliver	Edgar		PD117	Policy	SS7	Object					Object to the HGAs 9&10 being developed as they will cause significant strain on the roads in the vicinity of the sites and with existing overload at the connection road between Philadelphia and Peshaw, the Shiny roundabout and the roads connecting the A19.	Suggests traffic cannot be mitigated and the traffic would impact directly on to traffic.	The Council considers that transport impacts can be mitigated for. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Road access alongside these sites will be improved with the creation of the new link road from the A183 at Peshaw southwards to the A182 at Philadelphia.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Philip	Paisley		PD89	Policy	SS7	Object					Object to the policy on the grounds that the proposed development will add an extra 800 cars to the traffic flow and affect pollution and the road network in the area. Cite that there is no demand for additional housing at Peshaw, particularly in conjunction with Philadelphia site which would total 100+ houses within 0.5 kilometre radius.		Propose removal from the plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Margaret	Cowell		PD286	Policy	SS7	Object			Considers the allocation of HGA9 within policy SS7 is not effective.		Considers the allocation of HGA9 within policy SS7 is not consistent with National Policy.	Considers the allocation of HGA9 within policy SS7 is not justified as do not need any further homes or routes and will spoil surroundings. Need to retain trees and leave fields to soak up water.	No proposed modifications.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP6 The Coalfield), and for HGA9, (see Policy	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Tim	Jones		PD194	Policy	SS7	Object		Objection on the grounds that empty homes and brownfield land have not been prioritised for development over Green Belt land; Brexit is a severe threat to the housing market which has not been considered; and no exceptional or special circumstances have been provided for Green Belt release.	Objection on the grounds that empty homes and brownfield land have not been prioritised for development over Green Belt land; Brexit is a severe threat to the housing market which has not been considered; and no exceptional or special circumstances have been provided for Green Belt release.		Objection on the grounds that empty homes and brownfield land have not been prioritised for development over Green Belt land; Brexit is a severe threat to the housing market which has not been considered; and no exceptional or special circumstances have been provided for Green Belt release.	Objection on the grounds that empty homes and brownfield land have not been prioritised for development over Green Belt land; Brexit is a severe threat to the housing market which has not been considered; and no exceptional or special circumstances have been provided for Green Belt release.	Suggests prioritising brownfield land for development and identifying provision to support deficiencies in existing school and healthcare provision.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mureen	Maddison		PD136	Policy	SS7	Object		Objection on the grounds of providing no justification for 400 new homes on Green Belt land at HGA9, calling into question the exceptional circumstances for Green Belt removal and the use of empty homes before Green Belt land. Contests the council's engagement with the public during consultation and the development strategy which should focus on the regeneration of the town centre.	Objection on the grounds of providing no justification for 400 new homes on Green Belt land at HGA9, calling into question the exceptional circumstances for Green Belt removal and the use of empty homes before Green Belt land. Contests the council's engagement with the public during consultation and the development strategy which should focus on the regeneration of the town centre.		Objection on the grounds of providing no justification for 400 new homes on Green Belt land at HGA9, calling into question the exceptional circumstances for Green Belt removal and the use of empty homes before Green Belt land. Contests the council's engagement with the public during consultation and the development strategy which should focus on the regeneration of the town centre.	Objection on the grounds of providing no justification for 400 new homes on Green Belt land at HGA9, calling into question the exceptional circumstances for Green Belt removal and the use of empty homes before Green Belt land. Contests the council's engagement with the public during consultation and the development strategy which should focus on the regeneration of the town centre.	Suggests empty homes should be used to sustain the Plan's growth within the town before releasing land for development from the Green Belt, the Green Belt boundary should remain as it is in order to prevent loss of wildlife/trees/hedgerows/views and impacts upon surface water flooding and road networks and transport infrastructure.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council has complied with all statutory obligations and followed each of these regulations. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Ella	Fielding		PD132	Policy SS7	Object		Objection to the policy as it does not detail any exceptional circumstances to build on Green Belt land in accordance with paragraph 87 of the NPPF, the council has not considered the 3000 empty homes in Sunderland before proposing Green Belt housing sites for development and brand new houses at Elba Park are empty as the developer cannot sell them. Concerns that there is no demand for more of the same house types (seen at Elba Park) which will be built at Penshaw.	Objection to the policy as it does not detail any exceptional circumstances to build on Green Belt land in accordance with paragraph 87 of the NPPF, the council has not considered the 3000 empty homes in Sunderland before proposing Green Belt housing sites for development and brand new houses at Elba Park are empty as the developer cannot sell them. Concerns that there is no demand for more of the same house types (seen at Elba Park) which will be built at Penshaw.		Objection to the policy as it does not detail any exceptional circumstances to build on Green Belt land in accordance with paragraph 87 of the NPPF, the council has not considered the 3000 empty homes in Sunderland before proposing Green Belt housing sites for development and brand new houses at Elba Park are empty as the developer cannot sell them. Concerns that there is no demand for more of the same house types (seen at Elba Park) which will be built at Penshaw.	Objection to the policy as it does not detail any exceptional circumstances to build on Green Belt land in accordance with paragraph 87 of the NPPF, the council has not considered the 3000 empty homes in Sunderland before proposing Green Belt housing sites for development and brand new houses at Elba Park are empty as the developer cannot sell them. Concerns that there is no demand for more of the same house types (seen at Elba Park) which will be built at Penshaw.	Suggests using the 3000 empty home in Sunderland instead of Green Belt; using the vacant Vaux site/or car park to build homes instead of Green Belt, using the Pennywell Estate to build homes instead of Green Belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The speed of housing development differs from site to site, but the Council's evidence demonstrates an ongoing need and demand for new housing, including within the Coalfield area. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Janet	Hutchinson		PD1038	Policy SS7	Object		Objects to policy (HGA9 specifically) due to impact to traffic congestion/road infrastructure, impact to schools and local services. The Council should identify alternative brownfield land.	Objects to policy (HGA9 specifically) due to impact to traffic congestion/road infrastructure, impact to schools and local services. The Council should identify alternative brownfield land.		Objects to policy (HGA9 specifically) due to impact to traffic congestion/road infrastructure, impact to schools and local services. The Council should identify alternative brownfield land.		No modifications proposed.	The Council notes this representation. The Plan is supported by comprehensive evidence which includes studies on infrastructure capacity including the IDP, Education Report and Transport Assessment. The Spatial Strategy seeks to direct development to Brownfield sites but the SHLAA acknowledges that there is not sufficient to meet the Housing Requirement. The Compliance Statement sets out the Council's approach to the Spatial Strategy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Hutchinson		PD1042	Policy SS7	Object		Objects to Policy SS7 (specifically HGA9) due to impact on road infrastructure and traffic congestion (including the A19), the impact to local drainage systems, impact on school and doctors surgeries, and impact on local landscape. Potential impact to Country Park holding events and impacting on visitors to park.	Objects to Policy SS7 (specifically HGA9) due to impact on road infrastructure and traffic congestion (including the A19), the impact to local drainage systems, impact on school and doctors surgeries, and impact on local landscape. Potential impact to Country Park holding events and impacting on visitors to park.		Objects to Policy SS7 (specifically HGA9) due to impact on road infrastructure and traffic congestion (including the A19), the impact to local drainage systems, impact on school and doctors surgeries, and impact on local landscape. Potential impact to Country Park holding events and impacting on visitors to park.	Objects to Policy SS7 (specifically HGA9) due to impact on road infrastructure and traffic congestion (including the A19), the impact to local drainage systems, impact on school and doctors surgeries, and impact on local landscape. Potential impact to Country Park holding events and impacting on visitors to park.	No modifications proposed.	The Council considers this policy to be sound. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stephen	Laydon		PD801	Policy SS7	Object						Objects to Policy SS7 and HGA9 proposal due to the adverse impacts the site would have on local schools and health services, the increase in traffic congestion and the impact to the environment and landscape.	No modifications proposed.	The most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Roland	Buckingham		PD654	Policy	SS7	Object		<p>Objects to Policy SS7 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; adverse impact to landscape across Herrington Park; Penshaw site is not sustainable-would create an enclave that relies on car access; adverse impact from increased road traffic as a result of the developments; agricultural land loss unacceptable; access to local facilities is across a busy dual carriageway.</p>	<p>Objects to Policy SS7 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; adverse impact to landscape across Herrington Park; Penshaw site is not sustainable-would create an enclave that relies on car access; adverse impact from increased road traffic as a result of the developments; agricultural land loss unacceptable; access to local facilities is across a busy dual carriageway.</p>	<p>Objects to Policy SS7 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; adverse impact to landscape across Herrington Park; Penshaw site is not sustainable-would create an enclave that relies on car access; adverse impact from increased road traffic as a result of the developments; agricultural land loss unacceptable; access to local facilities is across a busy dual carriageway.</p>	<p>Objects to Policy SS7 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; adverse impact to landscape across Herrington Park; Penshaw site is not sustainable-would create an enclave that relies on car access; adverse impact from increased road traffic as a result of the developments; agricultural land loss unacceptable; access to local facilities is across a busy dual carriageway.</p>	<p>Objects to Policy SS7 because exceptional circumstances have not been justified; we have less Green Belt than any neighbouring authorities; that greenspace development is not justified; adverse impact to landscape across Herrington Park; Penshaw site is not sustainable-would create an enclave that relies on car access; adverse impact from increased road traffic as a result of the developments; agricultural land loss unacceptable; access to local facilities is across a busy dual carriageway.</p>	No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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														<p>It will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Rebecca	Benson		PD1029	Policy	SS7	Object						<p>Objects to Policy SS7 due to loss of greenfield land, landscape views, impact to wildlife, increase in traffic congestion and adverse impact on access to drainage, to local schools and health facilities. The Green Belt Review is flawed and many brownfield sites have been overlooked.</p>	No modifications proposed.	<p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further information regarding infrastructure needs and impact on wildlife is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kristina	Benson		PD1022	Policy	SS7	Object						<p>Objects to Policy SS7 due to loss of greenfield land, landscape views, impact to wildlife, increase in traffic congestion and adverse impact on access to</p>	No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are

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												<p>drainage, to local schools and health facilities. The Green Belt Review is flawed and many brownfield sites have been overlooked.</p>		<p>Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	proposed.
Sandra	Dickinson		PD1017	Policy	SS7	Object						<p>Objects to policy SS7 due to loss of open countryside and greenspace, when there are other brownfield and rundown areas that could be developed instead.</p>	No modifications proposed.	<p>The Council notes this representation. As stated in the Compliance Statement and the Exceptional Circumstance Report the Council consider that is necessary to amend the Green Belt boundary and allocated land for housing to meet identified needs.</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>
Yvonne	Briggs		PD263	Policy	SS7	Object						<p>Objects to the policy on the grounds that we need green fields, there are not enough doctor's surgeries or</p>	No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report.</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this</p>

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												schools and the roads are already too busy.		<p>The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	representation which require modifications to the Plan. Therefore no modifications are proposed.
Sarah	Boyd		PD786	Policy	SS7	Object						Objects to Policy SS7 on the grounds that the development will negatively impact on area openness and wildlife and will increase traffic congestion as well as noise and light pollution. There are other sites better positioned in the city	No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												for housing including brownfield land at Pennywell.		<p>therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
William	Emmerson		PD299	Policy	SS7	Object		Object to Policy SS7 on the grounds of how the sites have been selected for inclusion in the Plan. It is not clear why the sites proposed have been chosen. Do not believe that all other brownfield sites and alternatives have been considered first.	Objects to Policy SS7 on the grounds that it is not effective.		Objects to Policy SS7 on the grounds that it is not consistent with National Policy as Green Belt should only be developed as a last resort and the Council has not considered all alternatives including brownfield land.		Site HGA9 should be removed from the Plan and the Council should try harder to find alternative sites.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
John	Foster		PD304	Policy	SS7	Object		Object to Policy SS7 on the grounds of how the sites have been selected for inclusion in the Plan. It is not clear why the sites proposed have been chosen. Do not believe that all other brownfield sites and alternatives have been considered first.	Objects to Policy SS7 on the grounds that it is not effective.		Objects to Policy SS7 on the grounds that it is not consistent with National Policy as Green Belt should only be developed as a last resort and the Council has not considered all alternatives including brownfield land.		Site HGA9 should be removed from the Plan and the Council should try harder to find alternative sites.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to be retained for employment purposes. The Council has set out its specific response relating to site HGA9 in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Natalie	Moralee		PD814	Policy	SS7	Object				Objects to Policy SS7, stating that the Council has failed to justify exceptional circumstances for developing in the Green Belt		Objects to Policy SS7, stating that the Council has failed to justify exceptional circumstances for developing in the Green Belt	No modifications proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kimberley	Richardson		PD81	Policy	SS7	Support with mods	Suggests there is no need for more housing in the Shiney	Suggests there is no need for more housing in the Shiney	Suggests there is no need for more housing in the Shiney	Suggests there is no need for more housing in the Shiney	Suggests there is no need for more housing in the Shiney	Suggests there is no need for more housing in the Shiney	Remove Site HGA9 from the Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt	The Council considers there have been no soundness or legal

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						Row ward and the schools, doctors and roads could not cope with extra people.	Row ward and the schools, doctors and roads could not cope with extra people.	Row ward and the schools, doctors and roads could not cope with extra people.	Row ward and the schools, doctors and roads could not cope with extra people.	Row ward and the schools, doctors and roads could not cope with extra people.	Row ward and the schools, doctors and roads could not cope with extra people.		boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Yvonne	Hood		PD864	Policy	SS7	Object		Object to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared as alternative non Green Belt sites such as empty homes and brownfield land have not been fully explored.	Object to Site HGA9 of Policy SS7 on the grounds that it is not effective as alternative non Green Belt sites such as empty homes and brownfield land have not been fully explored.		Object to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy as the Green Belt can only be developed in exceptional or special circumstances and these are not present.	Object to Site HGA9 of Policy SS7 on the grounds that it is not justified as alternative non Green Belt sites such as empty homes and brownfield land have not been fully explored.	Consider alternative non Green Belt sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Full justification of this site is included in the Compliance Statement (see Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sandra	Ballantyne		PD266	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the basis that it has not been positively prepared.	Objects to Site HGA9 of Policy SS7 as it is not considered to be effective.		Objects to Site HGA 9 of Policy SS7 as it is not considered to be consistent with national policy.	Objects to the inclusion of site HGA9 in Policy SS7. If new houses are required these should be built on brownfield sites. Green Belt land should be left for future generations to enjoy. Does not believe that the proposals would result in durable Green Belt boundaries. Development would adversely impact on existing views. A buffer to Herrington Burn is not needed. Concern over impact on drainage and road network. Sunderland has low supply of Green Belt and this should be retained.	Remove site HGA9 from Policy SS7 as a housing allocation.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. Many local authorities have zero Green Belt (including all local authorities in Teesside) - although largely an urban authority, almost a quarter of the overall Sunderland land area is Green Belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Rene	Heron		PD355	Policy	SS7	Object		Considers policy SS7 not to be positively prepared	Considers policy SS7 not to be effective.		Considers policy SS7 not to be consistent with national policy.		HGA9 Penshaw should be removed from the plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Catherine	Mckie		PD80	Policy	SS7	Object			Objects to Site HGA9 of Policy SS7 and the Central Route section of the Coalfield Regeneration Route within Policy SP10 on the grounds that they are not effective.		Objects to Site HGA9 of Policy SS7 and the Central Route section of the Coalfield Regeneration Route in Policy SP10 on the grounds that they are not consistent with National Policy.	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt is a protected area to be maintained to prevent urban sprawl and wildlife. The houses would have a negative impact on Penshaw Monument and would be a blot on the landscape. Development would increase traffic, noise and air pollution on Chester Road there are insufficient places in GP surgeries and schools. Objects to the Central Route section of the Coalfield Regeneration Route as it would adversely affect the Green Flag Park and wildlife, harm a recreational area and adversely impact upon health and wellbeing, increase noise, dust and air pollution, increase traffic and there is no justification for the road.	Remove Site HGA9 from Policy SS7 and remove the Central Route section of Coalfield Regeneration Route from Policy SP10.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7). The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Audrey	Richards		PD85	Policy	SS7	Object		Objects to Site HGA9 of Site SS7 on the grounds that there are thousands of empty properties in Sunderland and other large developments planned, therefore no need to build in the Green Belt	Objects to Site HGA9 of Site SS7 on the grounds that there are thousands of empty properties in Sunderland and other large developments planned, therefore no need to build in the Green Belt		Objects to Site HGA9 of Site SS7 on the grounds that the Policy is not compliant with the NPPF which indicates that building in Green Belt must only be in exceptional or special circumstances, not including housing.	Objects to Site HGA9 of Site SS7 on the grounds that there are thousands of empty properties in Sunderland and other large developments planned, therefore no need to build in the Green Belt	Would like to see other sites used before the Green Belt including empty homes.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
William	Slasor		PD580	Policy	SS7	Object					Considers policy SS7, HGA9 not to be justified as brownfield land at Pennywell should be used before Peshaw green belt land. Facilities under pressure currently, highway impacts and impact on wildlife.	Utilise brownfield land at Pennywell before greenbelt at Peshaw.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Maur een	Carr		PD273	Policy	SS7	Object					Considers the policy not to be consistent with national policy.	Considers the policy is not justified due to impact on the road network and not enough facilities (schools, doctors, shops).	No Modification proposed.	A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.	
John	Tumman	Sunderland Civic Society	PD978	Policy	SP6	Object						Considers policy SP6.2 and HGA sites not justified as not needed for development due to the housing numbers within the plan being over ambitious and unachievable. Deleting HGA's in coalfield will retain the integrity of the green belt, minimise urban sprawl and lead to a more sustainable form of development.	Delete policy SP6.2 and HGA's. Reinstate the greenbelt designation. Policy SS7 would also then be superfluous.	The Council consider that exceptional circumstances exist which justify an amendment to the Green Belt. Further details are provided within the Exceptional Circumstances report and the Compliance Statement. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The housing requirement within the plan is considered to be realistic and achievable. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jeffery	Jackson		PD395	Policy	SS7	Object						Policy SS7 is not justified, the council should work harder to identify more suitable areas and work to develop brown sites.	Identify more suitable areas and work to develop brown sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Debbie	Gates		PD308	Policy	SS7	Object		Considers policy SS7 not to be positively prepared.	Considers policy SS7 not to be effective as the city centre should be regenerated as a priority.		Considers policy SS7 not to be consistent with national policy, in particular paragraph 87 and building on green belt should only be in exceptional or special circumstances.	Considers policy SS7 not to be justified as not utilising empty properties and not regenerating run down areas before planning to build on green belt.	Use empty properties and regenerate run down areas. Regenerate the city centre first would be more effective to encourage business and high income earners to the area.	Within the Plan, Policy H5 Existing homes and loss of homes, supports bringing empty properties back into use. Regeneration is a key issue recognised throughout the plan and is set out within the relevant strategic policies. The Urban Core is again recognised as an area for regeneration and policy SP2 sets out how this will be achieved.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Bradley	Sunderland Green Party	PD4495	Policy	SS7	Object						Specific objection relating to HGA9: The Plan should consider the volume of objections from Penshaw area. There is no plan to improve bus links and the existing road	No modifications proposed.	The Council notes this representation. The Council has taken into consideration all representation previously submitted to the Plan. The Council's Consultation Statement sets out how these issues have been addressed in the Plan. The Plan is supported by a comprehensive evidence base which	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are

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										network is often at capacity- this site will increase car use and fail on sustainability grounds. Loss of agricultural land and distanced from local facilities that are on the other side of a busy dual carriageway.		network is often at capacity- this site will increase car use and fail on sustainability grounds. Loss of agricultural land and distanced from local facilities that are on the other side of a busy dual carriageway.		has assessed the sites. The Compliance Statement justifies the spatial strategy for housing and sites selected in the Plan. The sustainability of the sites has been assessed in the Green Belt reports which identifies that the site is located to Shiney Row centre. There are good bus connections along Chester Road, and in light of the new road link being created (adjacent to the site, southwards to Philadelphia) the road network will not be at capacity.	proposed.
John	Tumman	Sunderland Civic Society	PD717	Policy	SS7	Object						Considers policy SSG7, HGA10 not to be justified as the house building target is over ambitious and as such no requirement for HGA's. Request delete HGA10 from the plan.	Deletion of HGA10 from the plan and proposals map. Re-instatement of land as green belt.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WYNARD HOMES	Wynyard Homes	PD4695	Policy	SP6	Object		Support Policy SP6 to a degree, but feel that some land is designated as Settlement Break incorrectly, including site at Quarry House Lane. Considered that the site is suitable for development and should be allocated as a Housing Growth Area in Policy SS7. The site is considered to be sustainable and there are no adverse impacts which cannot be mitigated. Several planning applications have been granted in Settlement Breaks and there is a degree of inconsistency between the NPPF and Policy NE7.			Support Policy SP6 to a degree, but feel that some land is designated as Settlement Break incorrectly, including site at Quarry House Lane. Considered that the site is suitable for development and should be allocated as a Housing Growth Area in Policy SS7. The site is considered to be sustainable and there are no adverse impacts which cannot be mitigated. Several planning applications have been granted in Settlement Breaks and there is a degree of inconsistency between the NPPF and Policy NE7.		Support Policy SP6 to a degree, but feel that some land is designated as Settlement Break incorrectly, including site at Quarry House Lane. Considered that the site is suitable for development and should be allocated as a Housing Growth Area in Policy SS7. The site is considered to be sustainable and there are no adverse impacts which cannot be mitigated. Several planning applications have been granted in Settlement Breaks and there is a degree of inconsistency between the NPPF and Policy NE7.	Allocate site at Quarry House Lane for residential development.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. In regards to the site, it is not considered suitable due to the fundamental impact on Settlement Break. As explained in the 2018 Settlement Break Review (Chapter 13, pages 139-149) this site (represented by field parcels 8 and 10) provides strong Settlement Break purpose, helping to retain East Rainton's distinct character and keep separate from Hetton-le-Hole. This is broadly supported by the 2012 NPPF (paragraph 58), which states that planning policies and decisions should aim to ensure that developments respond to local character and history. Although East Rainton has witnessed expansion over recent decades, the village is mediaeval in origin, dating back to at least the 12th Century, and the scale of the development proposed would impact significantly on its character, expanding the urban envelope by more than 30%. In addition to this, the field parcels also plays a key role in terms of green infrastructure connectivity, supporting a district-wide corridor that links Hetton Bogs and the Moors Burn southwards into County Durham. Priority species are also found within or in close proximity to the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dominic	Smith	Esh Developm	PD1875	Policy	SS7	Support with						Supports policy but minor amendments	To ensure Policy SS7 is consistent with	The Council has set out a response in relation to both of these sites in the	The Council considers there have been no

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		ents Ltd										should be made to align policy better to the NPPF. Specifically in relation to HGA11, the site is supported and the Green Belt Exceptional Circumstances Paper findings are also supported, which concludes that a more rectangular boundary will help to create a more robust and defensible Green Belt boundary. The consultee states that the site will be appropriately designed to meet the requirements set out within the emerging policy without constraining the developable area or indicative housing capacity. Specifically in relation to HGA10, a few amendments are proposed to the policy, including the exact location of the proposed community building which could increase site capacity to 30 dwellings, and that trees and vegetation should not be protected as they could affect site viability.	national policy, the following revisions are proposed: 2. address impacts and make provision or contributions towards education provision and healthcare "where necessary"; 3. Where appropriate and proportional to the development enhance access to local facilities and services. HGA10 amendments- (i) deliver approximately 30 new homes; (iv) provide greenspace improvements to the adjacent park; (vi) Delete need to retain all healthy trees and vegetation.	Compliance Statement (see Policy SS7 The Coalfield Housing Growth Areas), including specific comments made in relation to HGA10. Esh Developments propose that the policy makes reference to the exact location of the proposed community building, which in turn could increase site capacity to 30 dwellings. The Council considers that this level of detail is unnecessary for the policy, and also points out that the housing yield in the policy is approximate.	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey	PD3536	Policy	SS7	Support with mods							Supports policy but minor amendments should be made to align policy better to the NPPF. Specifically in relation to HGA9, the consultee supports the site for approximately 400 new homes and states that the site will be appropriately designed to meet the requirements set out within the emerging policy without constraining the developable area or indicative housing capacity. Boundary alteration to the south east is required, suggesting also that a smaller buffer may be appropriate to the Herrington Burn. Request for point 6 to be more flexible in relation to greenspace and to remove reference to pylon buffer zone (preferred option is to ground the pylons). Also request that sub point 7 is removed and point 10 is made less prescriptive and refer instead to a submitted Transport Assessment as part of any planning application.	To ensure Policy SS7 is consistent with national policy, the following revisions are proposed: 2. address impacts and make provision or contributions towards education provision and healthcare "where necessary"; 3. Where appropriate and proportional to the development enhance access to local facilities and services; 6. retain healthy trees where possible and incorporate greenspace through the site; 7. delete this as it duplicates point 3; 10. A Transport Assessment should be submitted as part of any planning application for the site which takes account of vehicular junctions in the vicinity of the site;	In support of HGA9, the Council has prepared a Development Framework which provides details on site constraints, together with development principles and parameters to guide development of these greenfield sites. These Frameworks are considered to be vital in order to guide future development of these sensitive sites. These parameters have informed the CSDP Policy. Given the known presence of priority species in and around the Herrington Burn (and potential flood risk to the area) a significant buffer to the east of the site is required, therefore the proposal to reduce the buffer is not supported. It should also be noted that the specific points in relation to HGA9 in Policy SS7 follow the word 'should'. There is therefore considered to be flexibility in the policy, if, for example, the pylon buffer zone was no longer required because the pylons were 'grounded'. Nevertheless, the remaining points (to provide greenspace central to the site; to provide ecological improvements to wildlife; to provide site access off Chislehurst Road and to assess impact to other junctions) are all considered to be key development parameters.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed
Dominic	Smith	Esh Developments Ltd	PD1872	Policy	SP6	Support						Supports Policy, and agrees that there is limited capacity within the urban area and that amendments to the Green Belt are essential to allow for the sustained growth of settlements to meet the housing need. Specifically supports inclusion of HGA11 to support delivery of at least	No modifications proposed.	The Council notes this representation.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Phil J	Young		PD4274	Policy	SS7	Object						195 new homes. There is no evidence of an objective method being used to determine which Green Belt sites are allocated for housing. Sunderland is already the worst authority in North East with only 25% Green Belt land, and a third is now proposed for deletion. There would be unacceptable impact on views to/from Penshaw Monument, existing road infrastructure would be badly affected, schools and doctors capacity difficult to achieve. Additional housing in Coalfield is already having a very detrimental effect on local roads.	No modifications proposed.	The Council notes this representation. The Plan is supported by a comprehensive evidence base which includes the Green Belt Reports, these reports assessed the sites to be proposed to be released from the Green Belt and allocated for development. The Evidence base also includes studies on infrastructure capacity including the IDP, Education Report and Transport Assessment. The Compliance Statement sets out the Councils approach to the Spatial Strategy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sylvia	Jackson		PD401	Policy	SS7	Object		Considers policy SS7, HGA9 not to have been positively prepared.	Considers policy SS7, HGA9 not to be effective.			Considers policy SS7, HGA9 not to be justified. Recognise need for more affordable housing, but should not be on greenfield land when plenty brownfield sites to build on. The area already struggles to cope with traffic, schools and doctors.	Disagree with proposals to build 400 houses on greenbelt site. Ecological damage and over development is not justified.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lesley	Emmerson		PD294	Policy	SS7	Object		Considers site HGA9 Penshaw not to have been positively prepared.	Considers site HGA9 Penshaw not to be effective		Considers the site HGA9 Penshaw not to be consistent with national policy as plan fails to provide infrastructure needs alongside new development. Infrastructure requirements not addressed or not mentioned.	HGA9 Penshaw should be removed from the plan.	A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport,	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.	
Claire	Foster		PD302	Policy	SS7	Object		Considers the policy to not be positively prepared.	Considers the policy not to be effective.		Considers the policy not to be consistent with national policy.	Considers the policy is not justified. Penshaw's infrastructure would not cope. Location would spoil national beauty and character. Infrastructure is not addressed in the plan. Building on green belt does not address economic issues in the city. Housing is not required in this area, properties stand empty. Brownfield land not properly consulted. Ineffective consultation and locals ignored.	Remove HA9 from plan completely and focus attention on brownfield, empty homes and inner city economic growth	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD176	Policy	SS7	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.	entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.			
Colin	Ford		PD175	Policy	SS7	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only been published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this site is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Helen	Stokoe		PD612	Policy	SS7	Object			Object to development of HGA9 because the Green Belt should be maintained in its present state, because of the impact to wildlife, impact to Penshaw Monument (history and views), impact to existing quality landscape, impact on greenspace, impact to potential flooding and impact from increased traffic.	Object to development of HGA9 because the Green Belt should be maintained in its present state, because of the impact to wildlife, impact to Penshaw Monument (history and views), impact to existing quality landscape, impact on greenspace, impact to potential flooding and impact from increased traffic.	Object to development of HGA9 because the Green Belt should be maintained in its present state, because of the impact to wildlife, impact to Penshaw Monument (history and views), impact to existing quality landscape, impact on greenspace, impact to potential flooding and impact from increased traffic.	No modifications proposed.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														<p>documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>With reference to drainage, the Policy stipulates that development should "mitigate any surface water flooding impacts and incorporate appropriate water attenuation in relation to flood zones associated with Herrington Burn" and "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development control process would ensure that any consent given for the development of the site would address any potential drainage and landscape issues, regardless of whether this extra emphasis was given in the policy wording or not.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Tobias	Fielding		PD296	Policy	SS7	Object					Object to HGA9 Penshaw as not consistent with National Policy which states Green Belt must be protected.		No Modification proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	
Kieran	Cook		PD277	Policy	SS7	Object	Objects to Policy SS7 on the grounds that it is not legally compliant.	Objects to Policy SS7 on the grounds that it has not been positively prepared.	Objects to Policy SS7 on the grounds that it is not effective.	Objects to Policy SS7 on the grounds that it is not compliant with the Duty to Cooperate.	Objects to Policy SS7 as it is not compliant with the NPPF.	Objects to Policy SS7 as Green Belt land should be retained within the Green Belt.	Build on brownfield sites instead of the Green Belt.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carl	Wood		PD689	Policy	SS7	Object	Object to site HGA 9 on the grounds that; development should be prioritised on Brownfield not Green Belt, damage to the local Bat population and the loss of Green Belt land.		Object to site HGA 9 on the grounds that; development should be prioritised on Brownfield not Green Belt, damage to the local Bat population and the loss of Green Belt land.		Object to site HGA 9 on the grounds that; development should be prioritised on Brownfield not Green Belt, damage to the local Bat population and the loss of Green Belt land.	Object to site HGA 9 on the grounds that; development should be prioritised on Brownfield not Green Belt, damage to the local Bat population and the loss of Green Belt land.	Development should be on brownfield land	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018)	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Patricia	Wood		PD684	Policy	SS7	Object						Object to site HGA9 on the grounds that it is unnecessary and will impact local road, schools, doctors and hospitals.	Site should remain as Green Belt	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object/Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
														Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
K	Wood		PD688	Policy	SS7	Object	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Object to site HGA9 on the grounds that the land should remain Green Belt. Development of the site is not consistent with the NPPF.	Development should be on brownfield and the Green Belt boundary should not be amended.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
William	Dunn		PD195	Policy	SS7	Object		Considers that the allocation of HGA9 within policy SS7 is not positively			Considers that the allocation of HGA9 within policy SS7 is not consistent with		Re-consider the development of Penshaw site and develop brownfield	The evidence base, in particular the SHMA justifies the need for more larger family dwellings and why people are moving out of the city. As	The Council considers there have been no soundness or legal compliance issues

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							prepared as do not agree that more large executive houses are required to stop people moving out of the area. If better quality homes are in short supply, this would be reflected in increased values, of which it has not. People wanting executive homes would move to Washington or Ryhope and not out of the area entirely. Should develop Sunderland and redevelop Hendon and use the access to beach and river to draw high earners in. Could redevelop land between Vaux and new bridge and bring people back into the town to support jobs in the City Centre. Bring empty properties back into use first. The Penshaw site supports a wide environmental need, which the park cannot provide. Questions asked in relation to pylons that cross the site, impacts of traffic survey, investment in infrastructure, environmental impact survey, protecting the burn and dog free areas in the park.			National Policy due to the unproven need for as many homes as planned.		sites in core Sunderland locations.	part of the SHLAA consideration has been given as much as possible to redeveloping areas such as Hendon and the land from the Vaux site to the new bridge, however a lot of the brownfield sites in the city are not considered viable, particularly in the City Centre and when they are located in low market areas. Areas referred to are also required for employment purposes and as such need to be retained for this use. Bringing empty properties back into use is supported through the plan and reflected in the relevant policy. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.	raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lynn	Gallon		PD187	Policy	SS7	Object	Objection on the basis that, the plan does not meet local housing needs; the evidence base is not strong enough to justify 11,000 new homes for a population under 300k people; new housing should be prioritised on brownfield land ahead of Green Belt; development would generate additional traffic which would exacerbate congestion on the A183 and A19; views of Penshaw monument would be interrupted and visitor numbers would be impacted; there are no exceptional circumstances for Green Belt removal; the strategy should focus development in the urban core and not the suburbs; and SCC have not carried out consultation in sufficient depth.	Objection on the basis that, the plan does not meet local housing needs; the evidence base is not strong enough to justify 11,000 new homes for a population under 300k people; new housing should be prioritised on brownfield land ahead of Green Belt; development would generate additional traffic which would exacerbate congestion on the A183 and A19; views of Penshaw monument would be interrupted and visitor numbers would be impacted; there are no exceptional circumstances for Green Belt removal; the strategy should focus development in the urban core and not the suburbs; and SCC have not carried out consultation in sufficient depth.			Objection on the basis that, the plan does not meet local housing needs; the evidence base is not strong enough to justify 11,000 new homes for a population under 300k people; new housing should be prioritised on brownfield land ahead of Green Belt; development would generate additional traffic which would exacerbate congestion on the A183 and A19; views of Penshaw monument would be interrupted and visitor numbers would be impacted; there are no exceptional circumstances for Green Belt removal; the strategy should focus development in the urban core and not the suburbs; and SCC have not carried out consultation in sufficient depth.	Suggests deletion of site HGA9 from policy SS7 and revision of the policies map to indicate that HGA9 will remain as Green Belt land for the duration of the plan period and beyond.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Michele	Ridley		PD532	Policy	SS7	Object	Object to the Plan as it does not deliver affordable housing, housing for key workers, a vision for the economy to minimise the need to commute and a plan	Object to the Plan as it does not deliver affordable housing, housing for key workers, a vision for the economy to minimise the need to commute and a plan		Object to the Plan as it does not deliver affordable housing, housing for key workers, a vision for the economy to minimise the need to commute and a plan		Rethink much of the process and retire the outdated current plan.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no

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							that is infrastructure rich. It has been produced without adequate consultation and has not taken on board the views of local communities.	that is infrastructure rich. It has been produced without adequate consultation and has not taken on board the views of local communities.		that is infrastructure rich. It has been produced without adequate consultation and has not taken on board the views of local communities.			appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting	modifications are proposed.

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														infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Economic Growth is dealt with in the CSDP in the Economic Growth chapter and is not the focus of this Policy. The Council has prepared a Consultation Statement (2018) which outlines the public engagement strategy. This is consistent with statutory requirements. Further information is set out in the Consultation Statement. Further justification for this policy can be found in Compliance Statement SS7.	
Colin	Ridley		PD529	Policy	SS7	Object		Object to the Plan as it does not deliver affordable housing, housing for key workers, a vision for the economy to minimise the need to commute and a plan that is infrastructure rich. It has been produced without adequate consultation and has not taken on board the views of local communities.	Object to the Plan as it does not deliver affordable housing, housing for key workers, a vision for the economy to minimise the need to commute and a plan that is infrastructure rich. It has been produced without adequate consultation and has not taken on board the views of local communities.				Rethink much of the process and retire the outdated plan.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Economic Growth is dealt with in the CSDP in the Economic Growth chapter and is not the focus of this Policy. The Council has prepared a Consultation Statement (2018) which outlines the public engagement strategy. This is consistent with statutory requirements. Further information is set out in the Consultation Statement. Further justification for this policy can be found in Compliance Statement SS7.</p>	
Vivienne	Young		PD128	Policy	SS7	Object	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	Object to validity of Growth Options consultation and use of this to justify housing requirement. Object to Green Belt Assessment, as mainly developers were consulted on the methodology. Do not consider that an objective assessment of housing need or Green Belt Assessment has been undertaken. In commuting is not a negative issue. Loss of views from development of Site HGA9. Economic growth does not consider impact of Brexit. Concerns	No modifications proposed.	The Council considers this policy to be sound. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The OAN calculation has been updated since the Growth Options consultation to take account of post-Brexit jobs forecasts and to take into consideration more recently published data. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites, increased densities and considered empty properties where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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							about impact of Site HGA9 on infrastructure. No evidence of housing need.	about impact of Site HGA9 on infrastructure. No evidence of housing need.	about impact of Site HGA9 on infrastructure. No evidence of housing need.	about impact of Site HGA9 on infrastructure. No evidence of housing need.	about impact of Site HGA9 on infrastructure. No evidence of housing need.	about impact of Site HGA9 on infrastructure. No evidence of housing need.		in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.	
Adele	Carter		PD122	Policy	SS7	Object		Object on the grounds that other run down housing sites have not been considered for redevelopment and investment ahead of identifying Green Belt sites for housing.	Object on the grounds that other run down housing sites have not been considered for redevelopment and investment ahead of identifying Green Belt sites for housing.		Object on the grounds that other run down housing sites have not been considered for redevelopment and investment ahead of identifying Green Belt sites for housing.	Object on the grounds that other run down housing sites have not been considered for redevelopment and investment ahead of identifying Green Belt sites for housing.	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	Edgar		PD138	Policy	SS7	Object		Objection as the council have failed to consider the 3000 empty homes in Sunderland before proposing to build housing on HGA9.	Objection as the council have failed to consider the 3000 empty homes in Sunderland before proposing to build housing on HGA9; the need for housing can be found elsewhere (3000		Objection as the proposals are not consistent with paragraph 87 of the NPPF which states that Green Belt must only be exceptional or special circumstances.	Objection as the need for housing can be found elsewhere (3000 empty homes) and there is no need to build more housing.	Suggest that 3000 empty homes and abandoned and condemned buildings are used instead of building in the Green Belt (HGA 9).	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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									empty homes) and there is no need to build more housing; and the proposals are not consistent with paragraph 87 of the NPPF which states that Green Belt must only be exceptional or special circumstances.					period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Stephen	Laydon		PD154	Policy	SS7	Object						Objection on the grounds that development of HGA9 would put pressure on oversubscribed schools, NHS health services and road infrastructure. In addition, development of the site would be unsightly and would result in the loss of Green Belt forever.	Suggests not building on site HGA9.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Gillian	Hesler		PD159	Policy	SS7	Object					Objection on the grounds that the evidence base/methodology is flawed and contrary to national Green Belt policy, its five purposes and the exceptional circumstances for development. It also fails to take account of HGA9's continuing role as Green Belt.		Remove HGA9 from the plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jessie	Corner		PD190	Policy	SS7	Object			Objection on the grounds that housing on HGA9 will have an	Objection on the grounds that housing on HGA9 will have an	Objection on the grounds that housing on HGA9 will have an	No Modification proposed.	A Transport Assessment has been prepared for the site and the findings will have to be implemented as the	The Council considers there have been no soundness or legal	

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										impact upon the traffic on the roads, the environment and GP surgeries and schools due to the increased number of new residents.	impact upon the traffic on the roads, the environment and GP surgeries and schools due to the increased number of new residents.	impact upon the traffic on the roads, the environment and GP surgeries and schools due to the increased number of new residents.		<p>site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Marc	Stubbs		PD232	Policy	SS7	Object		Objects to HGA9 (Penshaw) because there are countless brownfield land sites available (in City Centre, Deptford, Pallion, Hendon, Sheepfolds) as well as approximately 3000 empty homes in Sunderland. States that there are no exceptional circumstances to justify such development on Green Belt and is therefore contrary to national policy and the NPPF.	Objects to HGA9 (Penshaw) because there are countless brownfield land sites available (in City Centre, Deptford, Pallion, Hendon, Sheepfolds) as well as approximately 3000 empty homes in Sunderland. States that there are no exceptional circumstances to justify such development on Green Belt and is therefore contrary to national policy and the NPPF.		Objects to HGA9 (Penshaw) because there are countless brownfield land sites available (in City Centre, Deptford, Pallion, Hendon, Sheepfolds) as well as approximately 3000 empty homes in Sunderland. States that there are no exceptional circumstances to justify such development on Green Belt and is therefore contrary to national policy and the NPPF.	Objects to HGA9 (Penshaw) because there are countless brownfield land sites available (in City Centre, Deptford, Pallion, Hendon, Sheepfolds) as well as approximately 3000 empty homes in Sunderland. States that there are no exceptional circumstances to justify such development on Green Belt and is therefore contrary to national policy and the NPPF.	No modifications proposed.	All suitable, available and achievable brownfield sites have been included within the housing supply, this include sites in the City Centre, Deptford, Pallion, Hendon and the Sheepfolds. The plan, through policy H5 supports bringing empty properties back into use and the council have a number of implementation measures that assist in bringing empty properties back into use. The exceptional circumstances for developing within the Green Belt are set out within the council's evidence and in the Compliance statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Lyndsey	Burton		PD144	Policy	SS7	Object		Objects to Policy SS7 and does not think that it has been positively prepared.	Objects to Policy SS7 and does not think that it is effective.		Objects to Policy SS7 and does not feel that it is consistent with National Policy as Paragraph 87 of the NPPF indicates that building can only take place on Green Belt in exceptional or special circumstances.	Objects to Policy SS7 as there is plenty of brownfield land where new housing can be built without destroying the Green Belt opposite Penshaw. The plan is not justified as housing needs can be met elsewhere and there are thousands of empty properties in the city.	Indicates that the Plan should be amended to prioritise the use of empty homes and brownfield sites instead of Green Belt land.	After assessing all reasonable alternative options, the most sustainable method of delivering the identified housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julie	Sharples		PD563	Policy	SS7	Object		Objects to Policy SS7 on the grounds that site HGA9 should be removed and the Council should work harder to find more suitable areas and to develop brownfield sites.			Objects to Policy SS7 on the grounds that site HGA9 should be removed and the Council should work harder to find more suitable areas and to develop brownfield sites.	Objects to Policy SS7 on the grounds that site HGA9 should be removed and the Council should work harder to find more suitable areas and to develop brownfield sites.	Site HGA9 removed from Policy SS7 and the Council try harder to find more suitable sites and develop brownfield sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Luke	Sharpley		PD569	Policy	SS7	Object						Objects to Policy SS7 on the grounds that site HGA9 should be removed and the Council should work harder to find more suitable areas and to develop brownfield sites.	Site HGA9 removed from Policy SS7 and the Council try harder to find more suitable sites and develop brownfield sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sandra	Ramsey		PD476	Policy	SS7	Object		Objects to Policy SS7 on the grounds that the housing requirement within the Plan is excessive and not justified. There is not the jobs				Objects to Policy SS7 on the grounds that the housing requirement within the Plan is excessive and not justified. There is not the jobs	That the housing requirement should be reduced and the Green Belt remain untouched.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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							or infrastructure to support this. Objects to Site HGA9 as Green Belt should remain untouched. Challenges the evidence base.				or infrastructure to support this. Objects to Site HGA9 as Green Belt should remain untouched. Challenges the evidence base.			Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be	the Plan. Therefore no modifications are proposed.

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														found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Linda	Jackson		PD398	Policy	SS7	Object		Objects to Policy SS7 on the grounds that it has not been positively prepared.			Objects to Policy SS7 on the grounds that it is not consistent with National Policy.	Objects to Policy SS7 on the grounds that it is not justified.	That Site HGA9 is removed from the Plan and that the Council try harder to find more suitable sites and work to develop brownfield sites.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Stafford		PD611	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 as the Green Belt should only be developed in exceptional circumstances and there are other sites available which would positively enhance those areas, where development of Site HGA9 would be detrimental to the quality of the open space, affect views, wildlife, air quality and animal grazing.	Objects to Site HGA9 of Policy SS7 as the Green Belt should only be developed in exceptional circumstances and there are other sites available which would positively enhance those areas, where development of Site HGA9 would be detrimental to the quality of the open space, affect views, wildlife, air quality and animal grazing.		Objects to Site HGA9 of Policy SS7 as the Green Belt should only be developed in exceptional circumstances and there are other sites available which would positively enhance those areas, where development of Site HGA9 would be detrimental to the quality of the open space, affect views, wildlife, air quality and animal grazing.	Objects to Site HGA9 of Policy SS7 as the Green Belt should only be developed in exceptional circumstances and there are other sites available which would positively enhance those areas, where development of Site HGA9 would be detrimental to the quality of the open space, affect views, wildlife, air quality and animal grazing.	Alternative sites should be developed. Housing numbers may be too high due to uncertainties over Brexit.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Carole	Greenwell		PD319	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared.				Objects to Site HGA9 of Policy SS7 as too many houses are proposed and not enough infrastructure is in place.	A lot fewer houses, if any at all and additional amenities.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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William	Pearson		PD446	Policy	SS7	Object			Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective.		Objects to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy.	Objects to Site HGA9 of Policy SS7 due to the impact on the road network, doctor's surgeries, Herrington Country Park and wildlife and loss of Green Belt. Questions whether the Council will provide more school places. Brownfield sites should be developed instead of Green Belt. Questions need for housing when there are empty properties. Queries what will happen to land between South Hylton and the Aspire Bridge.	No modifications proposed.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														and within the above evidence base documents. The Council considers this Policy to be sound.			
Anne	Lawson		PD407	Policy	SS7	Object					Objects to Site HGA9 of Policy SS7 as it would result in significant building in the greenspace, it is a wildlife habitat with established hedges and trees and that the Council has not demonstrated there to be 'special circumstances' to develop on the Green Belt. The site also acts as a settlement break between Herrington and Peshaw. There area has a lot of older terraces and residents rely in the open space and country park. Concerned that the developer may wish to develop more than 400 houses.			Objects to Site HGA9 of Policy SS7 on the grounds of uncertainty over levels of population and economic growth, especially resulting from Brexit. Coalfield area has already experienced a lot of house building recently and road infrastructure struggling to cope. Concerned about additional pressures from proposals. Recent completions, average sale times and number of empty properties suggests there may be an over-supply of housing in Coalfield area. Plan should direct development to most appropriate locations without overburdening areas.	Remove Site HGA9 from the Plan. Other areas should be considered if the Council is certain that the new housing is required.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Peshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Bains		PD795	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that the policy has not been positively prepared as the Transport Assessment already shows junctions already operating over capacity and this will be made worse by development. There will be capacity issues on proposed Chislehurst Road and Chester Road junction if new road implemented. Empty properties should be utilised instead of building on Green Belt.			Objects to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy as Green Belt should only be developed in exceptional circumstances. The Council have not demonstrated that exceptional circumstances exist.		Objects to Site HGA9 of Policy SS7 on the grounds that the Policy is not justified as there are 3000 empty properties and brownfield sites available for development, which could be utilised as an alternative. Population is declining in Sunderland and may not require a level of growth which would need Green Belt incursion.	Utilise empty properties and brownfield sites and not develop in the Green Belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
													After assessing all reasonable				

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														<p>alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.</p> <p>A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Dorothy	Hepplewhite		PD351	Policy	SS7	Object						<p>Objects to Site HGA9 of Policy SS7 on the grounds of an increased volume of traffic on already congested roads, increased pressure on doctors surgeries and primary schools that are already operating at capacity and that there is no secondary school provision in the area.</p>	<p>New crossing point required on the road between Chester le Street/Washington and Sunderland as it is already very busy.</p>	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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														in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Anna E	Smith		PD588	Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that building houses would destroy wildlife habitat, the site is central to Penshaw's identity and the impacts of development cannot be mitigated.	Remove Site HGA9 from the Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sydney	Stead		PD604	Policy	SS7	Object	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	Objects to Site HGA9 of Policy SS7 on the grounds that Green Belt should stay as Green Belt	That Green Belt should not be built on.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report.	The Council considers there have been no soundness or legal compliance issues raised by this

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Jewel	Rennie		PD498	Policy	SS7	Object					<p>Objects to Site HGA9 of Policy SS7 on the grounds that if the site was developed there would be no Green Belt to defend as it would have been destroyed, the impact on the Grade I Listed Penshaw Monument and the increased traffic on already congested roads.</p>	<p>Objects to Site HGA9 of Policy SS7 on the grounds that if the site was developed there would be no Green Belt to defend as it would have been destroyed, the impact on the Grade I Listed Penshaw Monument and the increased traffic on already congested roads.</p>	Scrap the Plan.	<p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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														only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Kathryn	Holt		PD1193	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that the Policy is not positively prepared as the opinions of the community have not been considered, it does not address infrastructure issues, drainage/sewerage is inadequate, there are insufficient schools and doctors places, not clear where or how schools would be extended.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective due to the adverse impact on congestion and safety on the road network.		Objects to Site HGA9 of Policy SS7 on the grounds that the Policy is not consistent with Paragraph 87 of the NPPF as Green Belt should only be developed in very special circumstances, Sunderland has less Green Belt than other north east authorities, there are over 3000 empty properties in Sunderland and little attention has been given to the redevelopment of brownfield sites.	Objects to Site HGA9 of Policy SS7 on the grounds that the Policy is not justified as the community do not want or need it, there is not a need for executive housing, concerns over redirection of traffic, concerns over the impact that housing could have on ability of adjacent Country Park to host music events due to traffic and noise and destruction of flora and fauna.	No Modification proposed.	The council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council has complied with all statutory obligations and followed each of these regulations. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ian	Stafford		PD608	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively	Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective.		Objects to Site HGA9 of Policy SS7 on the grounds that it is not consistent with	Objects to Site HGA9 of Policy SS7 on the grounds that it is not justified.	No modifications proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the	The Council considers there have been no soundness or legal compliance issues

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								prepared.			National Policy.			Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Karen	Jones		PD402	Policy	SS7	Object					Objects to Site HGA9 of Policy SS7 on the grounds that it is Green Belt and would not be consistent with National Policy.	Objects to Site HGA9 of Policy SS7 on the grounds that the road infrastructure would not be able to accommodate extra traffic it would negatively affect the Herrington Country Park and Penshaw Monument, nearby Elba Park has stopped building due to lack of demand, the impact on ecology and that the population is declining so no evidence of housing need.	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well.</p> <p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities.</p> <p>Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.</p>	
Gillian	Dickinson		PD288	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective as it was mentioned that people commute into Sunderland as there is insufficient housing, however developing this site would still require people to travel on the A183 and A19 which are already busy.		Objects to Site HGA9 of Policy SS7 on the grounds that it isn't justified as there are empty houses and brownfield sites which could be used.		The Plan should be amended to use empty homes instead of Green Belt land. There are other areas that could be redeveloped such as Sunderland town centre.	<p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further details regarding greenfield land impact and landscape are included in the Compliance Statement (see HGA9, Policy SS7).</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Foster		PD303	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective.		Objects to Site HGA9 of Policy SS7 on the grounds that it is not consistent with the National Planning Policy Framework. The NPPF requires the Plan to provide for infrastructure, but the Plan fails to do so. Infrastructure issues such as drainage capacity are mentioned in the Plan, but not addressed.		No Modification proposed.	<p>The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														specific requirements such as art, heritage, and health facilities. With reference to drainage, the Policy stipulates that development should "mitigate any surface water flooding impacts and incorporate appropriate water attenuation in relation to flood zones associated with Herrington Burn" and "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development control process would ensure that any consent given for the development of the site would address any potential drainage and landscape issues, regardless of whether this extra emphasis was given in the policy wording or not. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.	
Lynda	Cox		PD5	Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that it is not justified.	No modifications proposed.	The Council considers this policy to be sound. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Pauline	Bradley		PD891	Policy	SS7	Object					Object to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy as the Plan fails to provide for infrastructure alongside new development. Many infrastructure issues are identified but not properly addressed. Other critical infrastructure issues are not mentioned.	Object to Site HGA9 of Policy SS7 on grounds that it will affect the history of the area, create congestion and overload public services. Questions the need for more houses when 3000 are unoccupied. The Council has not fully explored possible brownfield sites and alternatives. Lack of transparency on why sites have been chosen. The plan does not provide for necessary infrastructure. Plan is strong on intent and weak on deliverability. Lack of consultation and engagement with local communities.	Alternative sites including brownfield and empty properties should be considered before Green Belt.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Gillian	Smith		PD593	Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that it would devastate local wildlife and ecology, the Green Belt is central to Penshaw's identity and the impact of traffic with A183 already saturated.	Remove Site HGA9 from the Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													<p>appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence</p>	

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Laura	Smith		PD599	Policy	SS7	Object					Objects to Site HGA9 of Policy SS7 on the grounds that it would have an adverse impact on Penshaw Monument, providing pathways and cycle routes through the site is not needed, as there are already numerous ways to access Herrington Country Park and impact on traffic.	Remove Site HGA9 from the Plan.	base documents. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Mario	Watson		PD686	Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that it will create extra traffic. Avondale and Wensleydale Ave are already used as a rat-run to avoid Shiney Row roundabout. Traffic is already relentless during rush hour on a morning and in the evenings is much worse.	No modifications proposed.	A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ann	Wardle		PD676	Policy	SS7	Object						Objects to Site HGA9 of Policy SS7 on the grounds that Penshaw and surrounding villages are becoming over-developed and losing their identity, infrastructure is already overstretched, increased congestion making roads dangerous for pedestrians and motorists and spoiling open country views around Penshaw Monument and Herrington Country Park.	Concentrate more development on brownfield sites and unoccupied properties.	The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Peshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Audrey	Thompson		PD628	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it is not certain that the population will grow by so much, there is still adequate housing due to new developments where houses remain unsold, concerns over impact on infrastructure including congestion. Questions the levels of jobs growth anticipated with Brexit. Green spaces should only be developed in special circumstances. The new houses will likely be purchased by commuters who will put additional strain on limited local services such as doctors and schools.			Objects to Site HGA9 of Policy SS7 on the grounds that it is not certain that the population will grow by so much, there is still adequate housing due to new developments where houses remain unsold, concerns over impact on infrastructure including congestion. Questions the levels of jobs growth anticipated with Brexit. Green spaces should only be developed in special circumstances. The new houses will likely be purchased by commuters who will put additional strain on limited local services such as doctors and schools.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not certain that the population will grow by so much, there is still adequate housing due to new developments where houses remain unsold, concerns over impact on infrastructure including congestion. Questions the levels of jobs growth anticipated with Brexit. Green spaces should only be developed in special circumstances. The new houses will likely be purchased by commuters who will put additional strain on limited local services such as doctors and schools.	Remove Site HGA9 as a housing allocation.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Margaret	Timothy		PD633	Policy	SS7	Object	Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and no special circumstances have been evidenced to justify its loss.					Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and no special circumstances have been evidenced to justify its loss.	Exclude Green Belt land from development.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are

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													<p>Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. The Council's 2018 Education Report (see p6-7) considers the full impact of all 3 HGA sites on primary and secondary schools in the Coalfield. The Housing Growth Areas within Coalfield will generate an additional 141 primary school places, resulting in an overall deficit of 325 places. To accommodate the need for primary school pupils in this area, 1 primary</p>	proposed.

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														school is identified for extension and 1 form-entry school is required. Land at Success playing fields has been identified for this use. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Peshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Elizabeth	Scott		PD153	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and should not be built on unless absolutely necessary. There are thousands of empty homes which should be developed instead of ruining the countryside.	Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and should not be built on unless absolutely necessary. There are thousands of empty homes which should be developed instead of ruining the countryside.		Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and should not be built on unless absolutely necessary. There are thousands of empty homes which should be developed instead of ruining the countryside.	Objects to Site HGA9 of Policy SS7 on the grounds that the Green Belt is protected and should not be built on unless absolutely necessary. There are thousands of empty homes which should be developed instead of ruining the countryside.	Develop empty properties and the areas around them.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Gillian	Clements		PD189	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that the use of Green Belt for development and the approach to site selection is questionable. Do not consider that all alternative options have been considered. Concerned about the impact on the road network and increased noise and pollution to local residents.	Objects to Site HGA9 of Policy SS7 on the grounds that the use of Green Belt for development and the approach to site selection is questionable. Do not consider that all alternative options have been considered. Concerned about the impact on the road network and increased noise and pollution to local residents.		Objects to Site HGA9 of Policy SS7. The NPPF requires the Council to demonstrate that exceptional circumstances exist and that all other site options have been fully explored. The Council lacks transparency in its decision to develop Green Belt land.	Objects to Site HGA9 of Policy SS7 on the grounds that the use of Green Belt for development and the approach to site selection is questionable. Do not consider that all alternative options have been considered. Concerned about the impact on the road network and increased noise and pollution to local residents.	Site HGA9 should be removed from the Plan and more appropriate sites identified.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. Further details regarding greenfield land impact and landscape are included in the Compliance Statement (see HGA9, Policy SS7).	
Alan	Carpenter		PD126	Policy	SS7	Object			Objects on the grounds that Site HGA9 of Policy SS7 is not effective as too many assumptions have been made on growth levels based on the Growth Options consultation in 2016.		Objects on the grounds that Policy SS7 does accord with Paragraph 47 of the NPPF due to the length of time it takes to sell a house currently as an example.	Objects on the grounds that Site HGA9 of Policy SS7 is not justified as too many assumptions have been made on growth levels based on the Growth Options consultation in 2016.	No modifications proposed.	The Council considers this policy to be sound. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kelly	Tinnion		PD639	Policy	SS7	Object					Objects to Site HGA9 of Policy SS7 on the grounds that the impact on wildlife would be very harsh, does not consider the need for a durable Green Belt boundary when one already exists, there is already pedestrian and cycle access to the Country Park without the development and concerns about impact on residents, traffic, schools, doctors and tourism.	Objects to Site HGA9 of Policy SS7 on the grounds that the impact on wildlife would be very harsh, does not consider the need for a durable Green Belt boundary when one already exists, there is already pedestrian and cycle access to the Country Park without the development and concerns about impact on residents, traffic, schools, doctors and tourism.	No modifications proposed, nothing can make development acceptable.	The Council considers this policy to be sound. The Green Belt Boundary Assessment recommends that a revised strong, durable boundary can be created. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jimmy	Richards		PD525	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that there are 3000 homes in the city waiting development, the population is decreasing, affordable homes are needed, student homes are needed, urban sprawl should	Objects to Site HGA9 of Policy SS7 on the grounds that there are 3000 homes in the city waiting development, the population is decreasing, affordable homes are needed, student homes are needed, urban sprawl should		Objects to Site HGA9 of Policy SS7 on the grounds that there are 3000 homes in the city waiting development, the population is decreasing, affordable homes are needed, student homes are needed, urban sprawl should	Objects to Site HGA9 of Policy SS7 on the grounds that there are 3000 homes in the city waiting development, the population is decreasing, affordable homes are needed, student homes are needed, urban sprawl should	Remove site HGA9 and other Green Belt sites from the Plan.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								be stopped, economic issues will not be resolved by building unnecessary large expensive homes on Green Belt.	be stopped, economic issues will not be resolved by building unnecessary large expensive homes on Green Belt.		be stopped, economic issues will not be resolved by building unnecessary large expensive homes on Green Belt.	be stopped, economic issues will not be resolved by building unnecessary large expensive homes on Green Belt.		which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
David	Bains		PD785	Policy	SS7	Object		Object to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared as there are over 3,000 empty homes in Sunderland which could be used before Green Belt.			Object to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy as building on Green Belt should only be considered in exceptional circumstances and housing is not included as an exceptional circumstance.	Object to Site HGA9 of Policy SS7 on the grounds that it has not justified as the need for housing can be met on brownfield sites.	Brownfield sites and empty properties should be used for housing development.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Steven	Dickinson		PD289	Policy	SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it is not positively prepared as the site is an area of outstanding natural beauty and there are 8000 empty homes in Sunderland. These should be considered before Green Belt.	Objects to Site HGA9 of Policy SS7 on the grounds that the policy is not effective.		Objects to Site HGA9 of Policy SS7 on the grounds that it is not consistent with National Policy as the Green Belt should only be built on in exceptional or special circumstances. These tests have not been met.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not justified as there are 8000 empty homes in Sunderland. These should be considered before Green Belt.	Would like Site HGA9 removed as a housing allocation. Empty properties should be developed before Green Belt land is considered.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further details regarding greenfield land impact and landscape are included in the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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William	Emmerson		PD297	Policy SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective.		Objects to Site HGA9 of Policy SS7 on the grounds that it is not compliant with the NPPF as it does not address the impacts on infrastructure.		Site HGA9 should be removed from the Plan.	Compliance Statement (see HGA9, Policy SS7). The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Keith	Jackson		PD394	Policy SS7	Object			Objects to Site HGA9 of Policy SS7 on the grounds that it is not effective.			Objects to Site HGA9 of Policy SS7 on the grounds that the Plan should focus on building social housing and not spoiling the country park.	Do not build on the country park.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Peshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Herrington Country Park is not included within the development area of HGA9. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Catherine	Carr		PD121	Policy SS7	Object		Objects to Site HGA9 of Policy SS7 on the grounds that it has not been positively prepared.	Objects to Site HGA9 of Policy SS7 on the grounds that it has not effective.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not compliant with the Duty to Cooperate.	Objects to Site HGA9 of Policy SS7 on the grounds that it is not compliant with National Policy.	Objects to Site HGA9 of Policy SS7 on the grounds that it would use green land to provide housing for a	Redevelop other areas of Sunderland instead of building on Green Belt land.	After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan	The Council considers there have been no soundness or legal compliance issues raised by this

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												population already housed in other areas. Other areas should be developed. Concern over local school and GP Practice which are already oversubscribed. Concerned that there is no guarantee developers will deliver required infrastructure. Concerns over impact on traffic and congestion. Proposals would have adverse impact on greenfield views.		period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. In terms of infrastructure, a Transport Assessment and Education Report have been prepared for the site and each report indicates that the site is deliverable, subject to appropriate mitigation. The Council has also prepared an Infrastructure Delivery Plan and has consulted with health partners in order to address access issues relating to health facilities. CSDP Policies ID1 and ID2 will enable contributions to be secured towards infrastructure where required. Further details regarding greenfield land impact and landscape are included in the Compliance Statement (see HGA9, Policy SS7).	representation which require modifications to the Plan. Therefore no modifications are proposed.
Victor	Rennie		PD499	Policy	SS7	Object					Objects to Site HGA9 of Policy SS7 on the grounds that it would destroy wildlife habitat and increase the risk of flooding to surrounding areas.	Remove Site HGA9 from the Plan and retain the Green Belt.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. There are no direct impacts to protected wildlife sites on site, and Taylor Wimpey Homes has provided an Ecology statement identifying that the impact on protected and priority species is low. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														corridor along the Herrington Burn is minimised. The site avoids Flood Zones that exist to the east along Herrington Burn. Flood risk data from the Environment Agency identifies low risk to groundwater flooding and very minor proportion of land affected by surface water flooding. The Council, as the Lead Local Flooding Agency, are satisfied that appropriate design can mitigate for potential flooding and that appropriate connections can be made to sewers and drains. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery). Further justification can be found in Compliance Statement SS7: HGA9 and within the above evidence base documents.	
Kim	Lomax		PD160	Figure	30	Object		Save Penshaw Green Belt	Save Penshaw Green Belt			Save Penshaw Green Belt	No Modification proposed.	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Gillian	Clements		PD161	Policy	SS7	Object		Object on the grounds it makes no effort to promote the health, social and cultural well-being of the local communities of Shiney Row, Penshaw and New Herrington and it is not clear why development of Green Belt sites has been chosen before other viable sites.	Object on the grounds it does not protect or enhance the natural, built and historic environment, including the biodiversity of the area and does not support the principle of a low carbon economy; and it is not clear why development of Green Belt sites has been chosen before other viable sites.			Object on the grounds that it does not include sufficient detail with regards to how local infrastructure will be supplemented to support the recommended size of the development and it is not clear why development of Green Belt sites has been chosen before other viable sites	Remove policy and HGA 9 from the plan	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA9, and all other housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land and empty homes. Sensitive design will be required to mitigate for impacts to protected/priority species- if necessary by creating new areas of biodiversity-rich habitat equivalent or greater than the area of habitat loss, with features incorporated to attract and retain those species confirmed or potentially present on site. Scheme design will need to ensure that impact to the wildlife corridor along the Herrington Burn is minimised. Policy SS7 requires the development to minimise any impact on the area's landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building. This is considered to be achievable because the site lies more than 800m distant, and the dominant setting is formed by Herrington Country Park (formerly Herrington Colliery).A Transport Assessment has been prepared for the site and the findings will have to be implemented	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. Further information regarding infrastructure needs is detailed in the Compliance Statement (see response for site HGA9, Policy SS7).	
Barbara	Hooper	Historic England	PD97	Policy	SS7	Support with mods					Historic England welcomes the reference to the area's historic past within this policy. However the policy does not refer to the Newbottle Village Conservation Areas and its setting. The Development Framework does not describe the significance of the heritage assets affect or how development might enhance this.	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.	The Council agrees with Historic England's recommendation to reference the heritage constraints of site HGA11 and proposes to include reference the site's impact on specific heritage assets Newbottle Village Conservation Area and the listed buildings of the Philadelphia Complex. This is agreed within a Statement of Common Ground between the Council and Historic England (SD.8k). As part of the Statement of Common Ground, changes were agreed to the Development Frameworks (2018) evidence base and this has been updated accordingly (M29).	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 areas historic past including <u>Newbottle Village Conservation Area, and Listed Building in the locality.</u>	
Colin	Ford		PD177	Policy	SS7	Object					This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only be published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this sites is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.	This policy is considered to be unsound as exceptional circumstances have not been demonstrated in accordance with paragraph 136 and 137 of the NPPF. It is not considered accurate that the development in the Green Belt is the only realist option to accommodate the scale of growth envisaged. Land in the Settlement break at Houghton le Spring which is currently subject to a planning application could accommodate development. The decision to release green belt chronologically is also questioned. It is not considered acceptable that the case for exceptional circumstances has only be published at the publication stage. The statement in the Exceptional Circumstances Report which states that the remaining parts of the settlement breaks are those which are considered to be fundamental to their purpose is considered to be generalised and not accurate. The site identified in the Settlement Break can be developed entirely consistent with the purposes of the settlement break and is not conflicted. It is therefore inappropriate that this sites is designated as Settlement Break. There is no justification to release land in the coalfield sub-area when the site in the Settlement Break is available.	No modification proposed	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The Settlement Break site submitted by Mr Ford is referred to in detail in Policy SP6 (The Coalfield) and can also be referenced in the 2018 Settlement Break Review Addendum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Nigel	Harrison		PD893	Policy	SS7	Object		Objects to Site HGA11 of Policy SS7 on the grounds that the delivery of the site is dependent on the achievement of the Philadelphia complex and its proposed infrastructure. Concerned that this dependency is unreliable and site should be clearly dependent or independent.					Amend Policy SS7 to make clear if site is dependent upon delivery of adjacent Philadelphia complex or not.	Both sites are to be delivered by the same developer and the existing Philadelphia site, which has planning permission, is programmed to come forward within the next five years. The Housing Growth Area is not anticipated to come forward until final year of the existing site 2030/31 and the policy does specify that vehicle access to the HGA site has to come from the redevelopment site. On submission of the planning application for the HGA an appropriate mechanism to ensure delivery of a specific number of dwellings/development of the existing site is in place before the HGA commences could be considered.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Tumman	Sunderland Civic Society	PD1794	Policy	SS7	Object						Objects to Site HGA11 of Policy SS7 on the grounds that the housing requirement is overambitious and unachievable. There is therefore no requirement for the Housing Growth Areas.	Delete Site HGA11 from the plan and reinstate the Green Belt.	The Council considers this policy to be sound. The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The evidential basis justifying the release of the housing growth areas, from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD3948	Policy	SS7	Support with mods					Support Site HGA11 of Policy SS7, however consider that the requirement in point 3 for a design that relates to the area's historic past would not be consistent with national policy.	Support Site HGA11 of Policy SS7, however consider that the requirement in point 3 for a design that relates to the area's historic past would not be consistent with national policy.	Remove the requirement for development to incorporate a design that relates to the area's historic past from point iii.	The Council has set out a response in relation to this site in the Compliance Statement (see Policy SS7 The Coalfield Housing Growth Areas). The proposed alterations to Policy SS7 (HGA11) are not supported - the policy says that the site "should" address the listed issues, and it is important that these sensitive site issues are included in the policy in order that they are given due consideration at the planning application stage.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD98	Policy	SP7	Support						Historic England support the recognition that the historic environment plays a role in improving health and wellbeing, as noted in part 6(iv).	No modification proposed.	The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Kentucky Fried Chicken (Great Britain) Limited	PD260	Policy	SP7	Object		This part of the policy is negative in its assumptions, using the concept of "unhealthy eating outlets", which is unhelpful in isolation				This part of the policy is negative in its assumptions, using the concept of "unhealthy eating outlets", which is unhelpful in isolation	Amend SP7 (5) to "managing the balance of food and drink uses in centres and areas to provide access to a range of healthy eating	The policy seeks to manage the location/number and access to unhealthy eating outlets, which is wider than hot food takeaways.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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								from an understanding of the balance of uses in a centre or area and the catchment served and is at worst simply subjective. Furthermore, by reference to Policy VC4 it implies that 'unhealthy eating outlets' equate directly to hot food takeaways, which must therefore offer little choice and serve the same type and standard of food, regardless of operator or their healthy eating initiatives.				from an understanding of the balance of uses in a centre or area and the catchment served and is at worst simply subjective. Furthermore, by reference to Policy VC4 it implies that "unhealthy eating outlets" equate directly to hot food takeaways, which must therefore offer little choice and serve the same type and standard of food, regardless of operator or their healthy eating initiatives.	opportunities."		the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5284	Policy	SP7	Object			Object to Policy SP7 (6vii) and paragraph 5.5 - requiring all developments of 100 dwellings or more to submit a HIA is overly onerous and not consistent with national policy. These sections should be deleted.		Object to Policy SP7 (6vii) and paragraph 5.5 - requiring all developments of 100 dwellings or more to submit a HIA is overly onerous and not consistent with national policy. These sections should be deleted.	Delete SP7 part 6vii and paragraph 5.5.	Comment noted. Health Impact Assessments will only be required for large-scale schemes where impacts are considered to be likely. The thresholds set by the policy and supporting text are considered to be proportionate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Caroline	Strugnell	Bellway Homes Ltd	PD1925	Policy	SP7	Object		Object to Policy SP7 on the grounds that setting a mandatory requirement for when a Health Impact Assessment must be undertaken is not appropriate and would introduce an additional burden on developers. A HIA should only be required where the impact on health would be notable.			Object to Policy SP7 on the grounds that setting a mandatory requirement for when a Health Impact Assessment must be undertaken is not appropriate and would introduce an additional burden on developers. A HIA should only be required where the impact on health would be notable.	Modify Policy SP7 to only require a HIA to be undertaken when the health impacts of development are likely to be notable.	Comment noted. Health Impact Assessments will only be required for large-scale schemes where impacts are considered to be likely. The thresholds set by the policy and supporting text are considered to be proportionate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Adam	McVickers	Persimmon Homes (Durham)	PD3968	Policy	SP7	Object					Object to the requirement to prepare and submit a Health Impact Assessment as this is onerous and unjustified as these issues are already addressed by other policy and guidance. It would introduce regulatory red tape and not be compliant with national policy.	Object to the requirement to prepare and submit a Health Impact Assessment as this is onerous and unjustified as these issues are already addressed by other policy and guidance. It would introduce regulatory red tape and not be compliant with national policy.	Remove the requirement for a HIA from Policy SP7.	Comment noted. Health Impact Assessments will only be required for large-scale schemes where impacts are considered to be likely. The thresholds set by the policy and supporting text are considered to be proportionate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2301	Policy	SP7	Object					Objects to requirement for a HIA to be prepared for major developments as there is no national requirement for this and it would not be consistent with the EIA regulations. If a significant impact on health is identified, this should be covered in the Socio-Economic assessment of any EIA.	Objects to requirement for a HIA to be prepared for major developments as there is no national requirement for this and it would not be consistent with the EIA regulations. If a significant impact on health is identified, this should be covered in the Socio-Economic assessment of any EIA.	Remove the requirement for a HIA from Policy SP7 and amend Paragraph 5.5 to encourage the preparation of a HIA on major developments where appropriate rather than requiring it.	Comment noted. Health Impact Assessments will only be required for large-scale schemes where impacts are considered to be likely. The thresholds set by the policy and supporting text are considered to be proportionate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD69	Policy	SP7	Object			Support Policy SP7 in general terms, but feel that appropriate thresholds for a Health Impact Assessment should be 50 dwellings or more and student accommodation of 50 dwellings or more. This should be written into the Policy. Object to the use of the word significant in 6vii. Mitigation should be required for any impacts.		Support Policy SP7 in general terms, but feel that appropriate thresholds for a Health Impact Assessment should be 50 dwellings or more and student accommodation of 50 dwellings or more. This should be written into the Policy. Object to the use of the word significant in 6vii. Mitigation should be required for any impacts.	Set thresholds for Health Impact Assessment at 50 dwellings or more and student accommodation of 50 beds or more and remove the word significant from criterion 6vii.	Comment noted. The Council has agreed a Statement of Common Ground with NHS Sunderland CCG (SD.8k). The Council considers the threshold for residential schemes to be proportionate; however the PARAGRAPH 5.5 has been amended to include student accommodation of 100 bedspaces or more (M31).	...residential schemes for 100 dwellings or more, student accommodation schemes for 100 bed spaces or more, or any other form of development for which an Environmental Impact Assessment would be required.	
Melanie	Lindsley	The Coal Authority	PD1257	Policy	SP7	Support with mods					Support the inclusion of Policy SP7 but request that unstable	Include unstable land in criteria 6vi.	Comment noted. The Council do not consider it necessary to add unstable land to Policy SP7 as this is already	The Council considers there have been no soundness or legal	

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												land is added into criteria 6vi.		satisfactorily covered by Policies HS1 and M3.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carol	Dougherty		PD8200	Policy	SP7	Object						The proposed Renewable Energy Centre in Washington conflicts with Policy SP7.	Energy from waste plants should only be considered as far away from schools and residential properties as possible, or not at all.	The Council considers this policy to be sound. The plan does not allocate an energy from waste site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5312	Policy	HS1	Object					Object to HS1:- To ensure consistency with the NPPF, sub-points "1" and "2" should both relate to "significant adverse impacts" in accordance with the NPPF.		The following changes, in accordance with NPPF para 152, are necessary to make the policy sound: 1. Development must demonstrate that it does not result in significant adverse impacts which cannot be addressed through appropriate mitigation, arising from the following sources: 2. development must ensure that the cumulative impact would not result in significant adverse impacts on the local community "which cannot be addressed through appropriate mitigation or compensatory measures";	The Council propose an additional modification to Policy H1 to address this representation and to ensure consistency within the policy and with the NPPF (M32).	Development must ensure that the cumulative impact would not result in significant unacceptable adverse impacts on the local community
Nick	Horsley	Mineral Products Association	PD4378	Policy	HS2	Support with mods						Policy HS2 should consider agent of change referred to in Paragraph 182 of the NPPF (2018). Proposals in the plan should not impact unreasonably on existing uses and developments.	Amend Policy HS2 to make clear that proposals should not impact unreasonably on existing uses and developments.	Comment noted. The Council propose an additional modification to paragraph 5.6 to address this representation (M34).	Cumulative impacts should also be considered. Any new developments will be expected to follow the "agent of change" principles (i.e. person or business responsible for the change must also be responsible for managing the impact of the change).
Adam	McVickers	Persimmon Homes (Durham)	PD3973	Policy	HS1	Support with mods					Suggest that the text within parts 1 and 2 of the policy relating to mitigating adverse impacts is amended to say significant adverse impacts to ensure consistency within the policy and alignment to the NPPF.	Suggest that the text within parts 1 and 2 of the policy relating to mitigating adverse impacts is amended to say significant adverse impacts to ensure consistency within the policy and alignment to the NPPF.	Amend Point 1 to say significant adverse impacts instead of unacceptable impacts and amend Point 2 to allow for appropriate mitigation.	The Council propose an additional modification to Policy H1 to address this representation and to ensure consistency within the policy and with the NPPF (M32).	Development must ensure that the cumulative impact would not result in significant unacceptable adverse impacts on the local community
Melanie	Lindsley	The Coal Authority	PD1251	Policy	HS1	Support						Support Policy HS1 and notification in Criteria 1vii that issues of land instability should be addressed.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD70	Policy	HS1	Support						Supports criterion 2 of policy HS1. Suggests that it is appropriate that cumulative impacts are considered and this supports the respondents comments on policy SP7, mitigation should be required as part of any application for 50 dwellings or more.	Response to be read in conjunction of other responses submitted by the respondent.	Comment noted. The Council has agreed a Statement of Common Ground with NHS Sunderland CCG (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2325	Policy	HS1	Support with mods						The text in parts 1 and 2 of Policy HS1 should be amended to ensure consistency between the two different parts of the Policy and to ensure alignment with the	Change 'unacceptable' to 'significant' in Part 1 of the Policy and amend Part 2 to include 'which cannot be addressed through appropriate mitigation' in Part 2.	The Council propose an additional modification to Policy H1 to address this representation and to ensure consistency within the policy and with the NPPF (M32).	Development must ensure that the cumulative impact would not result in significant unacceptable adverse impacts on the local community

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											NPPF which relates to significant adverse impacts.				
Nick	Horsley	Mineral Products Association	PD4361	Policy	HS1	Support with mods						Unclear how Policy HS1 relates to a formal scoping for EIA development and with Policy SP11 which appears to suggest that the scope and requirements for considering minerals applications differs from other forms of development.	Consider the policy requirements with regard to scoping for EIA development and Policy SP11 to avoid duplication. The plan would benefit from clear indication of development management policies.	Comment noted. The Plan should be read as a whole. Policy HS1 applies to all planning applications, including minerals development Policy SP11 only relates to minerals development. The Council have proposed an additional modification (M76) to paragraph 13.2.	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 a landbank of at least 7 years for sand and gravel and at least 10 years for crushed rock, the aggregates landbank.
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2404	Policy	HS3	Support with mods						Generally support Policy HS3 but recognise that decontamination of sites can be costly and affect viability. Would like the Policy or supporting text to allow planning obligations to be relaxed where the developer is able to demonstrate that proposals would affect the viability of a scheme.	Amend Policy HS3 or supporting text to acknowledge costs associated with decontamination of sites and require a developer to submit a details viability assessment to demonstrate where remediation would affect site viability.	Comment noted. The Plan should be read as a whole. Policy ID2 already includes flexibility for planning obligations where this would affect site viability.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimon Homes (Durham)	PD3981	Policy	HS3	Support with mods						Generally support Policy HS3, however the Council should support developments which result in the decontamination of land. DE-contamination can be costly and affect site viability, so the Policy or supporting text should allow for the relaxation of planning obligations where the developer is able to demonstrate that development would not be viable.	Amend Policy HS3 to allow for the relaxation of planning obligations where remediation costs would make a scheme unviable.	Comment noted. The Plan should be read as a whole. Policy ID2 already includes flexibility for planning obligations where this would affect site viability.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD214	Policy	HS3	Support						Generally support Policy HS3 but recognise that decontamination of sites can be costly and affect viability. Would like the Policy or supporting text to allow planning obligations to be relaxed where the developer is able to demonstrate that proposals would affect the viability of a scheme.	Amend Policy HS3 or supporting text to acknowledge costs associated with decontamination of sites and require a developer to submit a details viability assessment to demonstrate where remediation would affect site viability.	The Statement of Common Ground between the Council and the Environment Agency agree no changes are required to Policy HS3 and its associated background text (SD.8k). Both parties agree that the protection of controlled waters is adequately addressed through the existing policy wording and background text	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Pippa	Cheetham	O&H Properties	PD4219	Policy	SP8	Object						2 strategic sites should have been included. The site at Groves should be included as a strategic allocation in Plan- allocating the site in future Site Allocations Plan leaves a policy vacuum whereby the site does not currently feature in the Core Strategy. A specific draft policy is set out. A full explanation should be given why the proposed Green Belt site at Newbottle was not considered at Stage 3 Green Belt Review.	A new strategic policy is proposed specifically for the Groves site.	The Plan allocates sites it intends to remove from the greenbelt and strategic allocations, such as Vaux which is considered to have a huge positive impact on the future of the city's economy and the SSGA, where around 3,000 new homes are proposed. It is the council's intention to allocate sites in the existing urban areas through the Allocations and Designations plan, of which Groves will be one. The greenbelt site reference in the representation was discounted at stage 2 as it performs strongly against greenbelt purposes. Further information is contained in the compliance statement in relation to Policy SS7.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5382	Policy	SP8	Object		Barratt David Wilson Homes support the approach to exceed the minimum target but consider that the Plan can only just meet the target. The target and buffer is insufficient as there	Barratt David Wilson Homes support the approach to exceed the minimum target but consider that the Plan can only just meet the target. The target and buffer is insufficient as there		Barratt David Wilson Homes support the approach to exceed the minimum target but consider that the Plan can only just meet the target. The target and buffer is insufficient as there	The Plan should increase the housing requirement, remove the windfall allowance and provide clarity on what is 'sustained under- performance against the	The Compliance Statement details the councils response to the sites BDW suggested should be removed from the SHLAA. With regards the buffer, the council have applied a flexibility factor of between 8%-10%, which is based upon lapsed planning permissions and possible non-delivery of a number of	Review of the Plan and appropriate evidence and consideration of the release of safeguarded land.	

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							are delivery concerns regarding the sites and SHLAA. Para 6.7 shows a windfall allowance of 50 dwellings per annum when the SHLAA trend shows 20 per year. BDW would like further clarify on 'sustained under performance against the requirement' and what would trigger a review of the Plan. BDW consider that safeguarded sites should be released prior to a review of the Plan. Figure 34 is overambitious and this should be reviewed. More site should be identified.	are delivery concerns regarding the sites and SHLAA. Para 6.7 shows a windfall allowance of 50 dwellings per annum when the SHLAA trend shows 20 per year. BDW would like further clarify on 'sustained under performance against the requirement' and what would trigger a review of the Plan. BDW consider that safeguarded sites should be released prior to a review of the Plan. Figure 34 is overambitious and this should be reviewed. More site should be identified.		are delivery concerns regarding the sites and SHLAA. Para 6.7 shows a windfall allowance of 50 dwellings per annum when the SHLAA trend shows 20 per year. BDW would like further clarify on 'sustained under performance against the requirement' and what would trigger a review of the Plan. BDW consider that safeguarded sites should be released prior to a review of the Plan. Figure 34 is overambitious and this should be reviewed. More site should be identified.	are delivery concerns regarding the sites and SHLAA. Para 6.7 shows a windfall allowance of 50 dwellings per annum when the SHLAA trend shows 20 per year. BDW would like further clarify on 'sustained under performance against the requirement' and what would trigger a review of the Plan. BDW consider that safeguarded sites should be released prior to a review of the Plan. Figure 34 is overambitious and this should be reviewed. More site should be identified.	requirement. The Plan should identify the release safeguarded land to meet housing need. The housing trajectory should be reviewed.	SHLAAA, sites. No windfall allowance has been made in the plan (as adjusted by the SHLAA), the plan does take into account small sites and includes 50 per year, as set out in compliance statement and allows for 20 losses through demolition each year from year 6. With reference to 'sustained under performance', the definition of this is set out within the Council's Monitoring Report. With regards safeguarded land, a reference to this will be inserted within the last bullet of paragraph 6.9 (M35).	
WYNYARD HOMES		Wynyard Homes	PD4697	Policy	SP8	Support with mods					Fully support Policy SP8 in terms of working to exceed the minimum housing requirement and support the types of sites that will achieve this. However, would like land at Quarry House Lane to be included as a Housing Growth Area. Would also like the site to be assessed as part of the SHLAA.	Allocate site at Quarry House Lane for residential development and consider the site through the SHLAA.	The Council does not support the site put forward by Wynyard Homes due to the fundamental impact on Settlement Break. As explained in the 2018 Settlement Break Review (Chapter 13, pages 139-149) this site (represented by field parcels 8 and 10) provides strong Settlement Break purpose, helping to retain East Rainton's distinct character and keep separate from Hetton-le-Hole. This is broadly supported by the 2012 NPPF (paragraph 58), which states that planning policies and decisions should aim to ensure that developments respond to local character and history. Although East Rainton has witnessed expansion over recent decades, the village is mediaeval in origin, dating back to at least the 12th Century, and the scale of the development proposed would impact significantly on its character, expanding the urban envelope by more than 30%. In addition to this, the field parcels also plays a key role in terms of green infrastructure connectivity, supporting a district-wide corridor that links Hetton Bogs and the Moors Burn southwards into County Durham. Priority species are also found within or in close proximity to the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD3996	Policy	SP8	Support with mods					Generally support the identification of the housing target inclusive of economic growth aspirations and principle of seeking to exceed this, however consider that the requirement is too low.	Consider an uplift to the housing requirement.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dixon	Highways England	PD4849	Policy	SP8	Object		Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study			Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - <u>The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council</u>

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									can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			<p>will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties.</p> <p>12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.</p>
Ray	Delaney		PD31	Figure	33	Object		Mr Delaney requests that the figure is updated and the Plan allocates site 464B should be shown as an allocation on the Plan.	Mr Delaney requests that the figure is updated and the Plan allocates site 464B		Mr Delaney requests that the figure is updated and the Plan allocates site 464B	Mr Delaney requests that the figure is updated and the Plan allocates site 464B	Allocate site 464B	The Council does not support the proposed alteration to Figure 33 as the site is not allocated in the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ray	Delaney		PD32	Policy	SP8	Object		Mr Delaney supports criterion 1 but objects that sites are not allocated in this plan, especially site 464B. Criterion 3 should be amended to allow other sites to come forward. Criterion 5 is supported but an additional criterion should be added to ensure that self build dwellings should not be limited to a proportion of larger sites. The policy should also make a commitment to small and medium builder, the NPPF	Mr Delaney supports criterion 1 but objects that sites are not allocated in this plan, especially site 464B. Criterion 3 should be amended to allow other sites to come forward. Criterion 5 is supported but an additional criterion should be added to ensure that self build dwellings should not be limited to a proportion of larger sites. The policy should also make a commitment to small and medium builder, the NPPF		Mr Delaney supports criterion 1 but objects that sites are not allocated in this plan, especially site 464B. Criterion 3 should be amended to allow other sites to come forward. Criterion 5 is supported but an additional criterion should be added to ensure that self build dwellings should not be limited to a proportion of larger sites. The policy should also make a commitment to small and medium builder, the NPPF	Mr Delaney supports criterion 1 but objects that sites are not allocated in this plan, especially site 464B. Criterion 3 should be amended to allow other sites to come forward. Criterion 5 is supported but an additional criterion should be added to ensure that self build dwellings should not be limited to a proportion of larger sites. The policy should also make a commitment to small and medium builder, the NPPF	Sites should be allocated wherever possible. Amend criterion 3 to allow other sites to come forward. List self-build as an additional criterion. Include a commitment in the Plan and through allocations to supporting small and medium house builders.	Appropriate sites identified in the SHLAA will be allocated through the Allocations and Designations plan and not through this strategic plan. Policy SP8 is considered flexible enough to allow other appropriate housing sites to come forward, especially as it references the development of windfall sites. Not considered appropriate to include self-build as an additional criteria to what will make up the housing requirement within policy SP8 as self-build will fall within a number of the criteria. Considered more appropriate to insert additional supporting text to policy H1 in relation to self-build (M38)	To assist people who want to build their own home, the council will support appropriate self-build developments as well as seek to identify appropriate small sites to assist in the delivery of self-build/custom house building plots.

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								required that 20 percent of allocated should be half a hectare or less.	required that 20 percent of allocated should be half a hectare or less.		required that 20 percent of allocated should be half a hectare or less.	required that 20 percent of allocated should be half a hectare or less.			
Angela	Templeman	Springwell Village Residents Association	PD5036	Policy	SP8	Object		There is no evidence to deviate from the standardised methodology. The Policy is not justified or effective.	There is no evidence to deviate from the standardised methodology. The Policy is not justified or effective.		There is no evidence to deviate from the standardised methodology. The Policy is not justified or effective.	There is no evidence to deviate from the standardised methodology. The Policy is not justified or effective.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nina	Bond		PD77	Chapter	6	Object		Object to the housing chapter on the grounds, that development should not take place on the Green Belt, the SHLAA should not identify Seaburn as a suitable site. Development on Green Belt land will result in a loss of open space, increased pressure on GP services, schools and traffic. The development of Seaburn will not bring benefits to the community as it is not for affordable homes.					The chapter should not include Seaburn as a potential housing development and it should be considered for alternative uses.	The SHLAA does identify the site as a housing development. The Allocations and Designation Plan will allocate other sites. In regards to this site, a planning application is currently being considered.	The Council considers there have been no soundness or legal compliance issues raised by this representations which require modifications to the plan. Therefore no modifications are proposed.
Carol	Dougherty		PD78	Policy	SP8	Object						Objects to housing development proposed on Green Belt sites. In addition the level of housing development will have significant impacts on local amenities (GPs, schools and shops) and transport provision and infrastructure.	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of HGA9 does not have a fundamental adverse impact on the Green Belt and that the site is available, achievable and deliverable and so considered a suitable HGA site. A Transport Assessment has been prepared for the site and the findings will have to be implemented as the site comes forward. This assessment will also ensure that site access is safe and also take into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The Draft Infrastructure Delivery Plan (2018) has been prepared to support	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site specific requirements such as art, heritage, and health facilities. Further justification can be found in the Compliance Statement and within the above evidence base documents. The Council considers this Policy to be sound.	
The Late Mrs M R	Swinburn		PD1498	Policy	SP8	Object		Objects to policy because the site put forward by the consultee has not been included in the identified housing supply put forward in supporting documents to the plan.				Objects to policy because the site put forward by the consultee has not been included in the identified housing supply put forward in supporting documents to the plan.	No modifications proposed to policy.	As set out in the relevant evidence base the site is considered fundamental to the purposes of the Green Belt and a strong robust boundary is in place and should be retained. See Compliance Statement for further justification.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Skinner		PD8498	Chapter	6	Object		Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.				Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.	Development should be focussed on brownfield sites and be for bungalows and affordable housing, not multi-storey units and executive housing. Basic facilities should be maintained at Seaburn and public transport links improved. Vaux site should be used to provide a walking and cycling link from the city centre to the harbour, not offices. The affordable housing requirement should be raised to 50% instead of 15%.	The Council considers the Plan to be sound. With regards consultation, the council is required to follow the procedures and regulations laid down in the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended, and in its adopted Statement of Community Involvement in regard to consultation. The council adopted its Statement of Community Involvement (SCI) in February 2015. This sets out the processes that the council will follow to engage and consult with local communities and key stakeholders, including statutory and Duty to Cooperate consultees, in the course of drafting Local Plan documents. The Council has complied with all statutory obligations and followed each of these regulations. In relation to the issues raised regarding the Sea front, these are detailed points which would not be dealt with through this strategic plan. The Sea Front Strategy and subsequent master plans for both Seaburn and Marine Walk provide more information on the detail of the sea front improvements. A number of improvements have already taken place at the sea front, such as traffic calming measures, improved toilet facilities, provision of wheelchair access and changing facilities. In addition to these detailed strategies, Policy VC6 of the CSDP is in place to support leisure and tourism proposals at Seaburn and Roker Sea front. The comment in relation to bus services not using Park Lane Interchange is not a matter that can be dealt with by this strategic plan. The CSDP policy ST1 Urban Core accessibility and movement is in place to enhance movement through the Urban Core and sets out how this can be achieved, which includes 'improving the attractiveness of Park Lane Interchange'. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														approach in relation to the viable use of brownfield land. Safeguarded land is a term used nationally to ensure local plans are capable of enduring beyond the plan period, so as to meet the likely longer term development needs. Safeguarded land can only be released for development through a review of the plan.	
John	Tumman	Sunderland Civic Society	PD987	Policy	SP8	Object						Considers policy SP8 is not justified due to the annual target being greater than the baseline requirement and no indication of the basis for this, other than jobs-led scenario in SHMA addendum, of which no guarantee can be made that workers will live in Sunderland and other authorities are also making provision for new housing. Also object to the reference to the target being a minimum, as exceeding the target would exacerbate the adverse consequences for the city. Will be damaging to the stability of the housing market, successful regeneration of inner urban areas, sustainable development, containment of the built up area, the ongoing integrity of the green belt. An upward review of the plan would be easier to achieve than a downward assessment.	Revised target of 570 additional dwellings per year. The wording to SP8.3 replaced to only reference committed or sites with planning permission in SSGA. This removes references to HGA's and land north of Burdon Lane.	The Council consider that exceptional circumstances exist which justify an amendment to the Green Belt. Further details are provided within the Exceptional Circumstances report and the Compliance Statement. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The housing requirement within the plan is considered to be realistic and achievable. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McClellan	Story Homes	PD977	Policy	SP8	Support with mods						Story Homes broadly supports Policy SP8 and the minimum housing requirement of 745dpa, however would consider that a minimum housing requirement of 880pda is needed. The Councils approach to not using the standardised methodology is supported, as it would result in not enough homes to support the future levels of economic growth. In fact, the standardised methodology would reduce housing numbers by 20%. It is vital that LPA used the SM as a starting point. The IAMP is a significant driver in the north east and will create an additional 7200 new jobs, it is therefore paramount that there is a uplift for housing in accordance with national policy, to ensure there are sufficient homes to	The target should be changed to 880pda.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												support the aspiration of the IAMP and to bolster the future economic growth of Sunderland.			
Unknown		Church Commissioners For England	PD5245	Policy	SP8	Support with mods						Support approach to release sites from Green Belt to meet housing requirement, however disagree that the most suitable sites have been chosen. Consider that Phase 2 of South of Ryhope site should be deleted from Green Belt and included as a housing allocation. Disagree with scoring in Green Belt Assessment and question whilst originally passing to Stage 2 of the Assessment the site was later discounted at Stage 1. Considers that all issues can be mitigated such as ecological issues.	Remove Phase 2 of South of Ryhope site from the Green Belt and designate it as a housing allocation.	The reasons for the Council not supporting this site as safeguarded land are as follows. The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report states on Pages 112-114 that the proposed development land (Phase 2) would have a fundamental impact on the Green Belt (namely in terms of urban sprawl and countryside encroachment). Furthermore, the impact to settlement merging between Sunderland and Seaham is significant, virtually reducing the Green Belt gap to the County Durham side only. The Church Commissioners make reference to the original Stage 1 Green Belt Review carried out by the Council, which at the time stated that there were "exceptional strategic circumstances" that warranted further consideration of this site, as it was included as part of a larger "Location for Major Development" site. However, neither the 2017 or 2018 versions of the CSDP support this area as forming part of the South Ryhope site within the SSGA, nor is it included within the SSGA Masterplan. This was a consideration in the 2016 Growth Options consultation and is no longer applicable. Both Green Belt reports make clear that the land in question provides a fundamental role to Green Belt purpose and it should remain as such. In terms of biodiversity, the Council additionally considers that the proximity of Ryhope Dene Local Wildlife Site (which forms Ancient Semi-Natural Woodland) together with the proximity of the European protected coastline (which thereby invokes significant Habitats Regulations Assessment issues) are highly significant factors that limit further development within this area. The need to minimise further encroachment by residents and domestic pets onto the coastline, and need to retain significant buffers to Ryhope Dene are fundamental principles identified in both the CSDP and the SSGA Masterplan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Central Gospel Hall Trust	PD147	Policy	SP8	Support							No Modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Jameson	Miller Homes Ltd - NE Region	PD890	Policy	SP8	Support						Support Policy SP8.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3385	Policy	SP8	Support with mods		Support Policy SP8. It is acknowledged that the requirement exceeds the Government's standardised methodology and is therefore positively prepared.				Support Policy SP8. It is acknowledged that the requirement exceeds the Government's standardised methodology and is therefore positively prepared. However, suggest that a further uplift to the housing requirement is provided to support the delivery of more affordable housing to help address the imbalance.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dominic	Smith	Esh Developments Ltd	PD1850	Policy	SP8	Support						Supports the Policy and supports the OAN which accords	No modifications proposed.	The reference to a minimum within policy SP8 is already in place.	The Council considers there have been no soundness or legal

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												with the principles set out in the NPPF which indicate that OAN must respond positively to wider opportunities for growth and take account of market signals. The consultee supports an employment-led scenario to identify its OAN, but this number should be represented as a minimum and could go higher.			compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey		Taylor Wimpey	PD3590	Policy	SP8	Support with mods						Supports the Policy and supports the OAN which accords with the principles set out in the NPPF which indicate that OAN must respond positively to wider opportunities for growth and take account of market signals. The consultee supports an employment-led scenario to identify its OAN, but this number should be represented as a minimum and could go higher.	No modifications proposed.	Policy SP8 specifies that the target of 745 additional dwellings per year is a minimum.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD4885	Policy	SP8	Support with mods						Supports the Policy and supports the OAN but it is concluded that the OAHN for Sunderland is greater than the 745 dpa identified within the SHMA Addendum and as a consequence the OAN identified by Sunderland and presented as the housing requirement in the CSDP represents the minimum level of housing required. A higher level of housing would help to meet economic-led needs set out in the SHMA Addendum and go further towards meeting affordable housing needs identified in Sunderland.	It is concluded that the OAHN for Sunderland is greater than the 745 dpa identified within the SHMA Addendum and as a consequence the OAN identified by Sunderland and presented as the housing requirement in the CSDP represents the minimum level of housing required. A higher level of housing would help to meet economic-led needs set out in the SHMA Addendum and go further towards meeting affordable housing needs identified in Sunderland.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Unknown		Church Commissioners For England	PD1776	Policy	SP8	Support						Supports the policy, agreeing that exceptional circumstances exist to justify the removal of land from Green Belt for residential development. Support the approach to allocate sites identified within the SHLAA as well as those in Green Belt for residential development. However, it is considered prudent for the SHLAA sites to be included within the Policies Map to ensure the effectiveness of the draft Policy over the Plan period.	Include SHLAA sites within the Policies Map.	The CSDP is a strategic plan and as such sets out the strategic allocations on the policies map. The Allocations and Designations Plan will allocate housing sites needed.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Joanne	Harding	Home Builders Federation	PD1183	Policy	SP8	Support with mods		The HBF generally supports the Councils ambition to work with partners and landowners to exceed the minimum target but the HBF consider that the housing requirement is too low and requires further	The HBF generally supports the Councils ambition to work with partners and landowners to exceed the minimum target but the HBF consider that the housing requirement is too low and requires further		The HBF generally supports the Councils ambition to work with partners and landowners to exceed the minimum target but the HBF consider that the housing requirement is too low and requires further	The housing requirement should be reconsidered to be increased to redress the imbalance in household formation rate and to provide additional affordable homes. Additional housing supply	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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								consideration.	consideration.		consideration.	should also be identified.			
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3016	Policy	SP8	Object					There is no need for the council to exceed a minimum target if to exceed that target involves the deletion of Green Belt land, as this would cause greater harm than benefit.	No modifications proposed.	<p>The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework.</p> <p>In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1.</p> <p>The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites. Further justification is set out in the Compliance Statement.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2421	Policy	SP8	Support with mods					Welcome the use of an employment-led scenario for the OAHN, agree that the number should be represented as a minimum and could go higher which would go further towards meeting identified affordable housing need. Increased level of growth is necessary to maintain a strong	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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												labour force in light of challenges of our migration and ageing population. Building right homes in right places will attract people to Sunderland and failure to do so would have adverse impact upon ability to meet growth aspirations.			
Barbara	Hooper	Historic England	PD99	Paragraph	6.8	Support						Historic England welcomes the intention to work closely with owners of empty properties to encourage reoccupation.	No proposed modifications	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1888	Policy	SP8	Object		Support proactive approach, but consider housing requirement is too low and the Policy needs to make reference to the need to safeguard sites for future residential development.			Support proactive approach, but consider housing requirement is too low and the Policy needs to make reference to the need to safeguard sites for future residential development.		Increase housing requirement and amend Policy SP8 to make reference to the need to safeguard sites for future residential development.	The Council propose an additional modification to paragraph 6.9 to address this representation (M35).	Review of the Plan and, appropriate evidence and consideration of the release of safeguarded land.
Joanne	Harding	Home Builders Federation	PD4522	Paragraph	6.7	Support		The HBF considers that an allowance for 50 residential dwellings for small sites is only appropriate where it can be evidenced that these small sites will continue to come forward and there will remain a deliverable supply. The HBF supports the Council that an empty homes and windfall allowance has not been included. The HBF also supports that the Plan has made an allowance for demolitions.	The HBF considers that an allowance for 50 residential dwellings for small sites is only appropriate where it can be evidenced that these small sites will continue to come forward and there will remain a deliverable supply. The HBF supports the Council that an empty homes and windfall allowance has not been included. The HBF also supports that the Plan has made an allowance for demolitions.		The HBF considers that an allowance for 50 residential dwellings for small sites is only appropriate where it can be evidenced that these small sites will continue to come forward and there will remain a deliverable supply. The HBF supports the Council that an empty homes and windfall allowance has not been included. The HBF also supports that the Plan has made an allowance for demolitions.	The HBF considers that an allowance for 50 residential dwellings for small sites is only appropriate where it can be evidenced that these small sites will continue to come forward and there will remain a deliverable supply. The HBF supports the Council that an empty homes and windfall allowance has not been included. The HBF also supports that the Plan has made an allowance for demolitions.	No modification proposed.	The allowance for small sites of 50 units per year is considered appropriate and is evidenced through the SHLAA. The SHLAA indicates on average over the past 5 years 47 units are delivered each year.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5413	Policy	H1	Object		Barratt David Wilson Homes (BDW) consider that the Local Plan should not dictate the housing mix across the city, it is unnecessary and inflexible. The policy should encourage rather than require. BDW would urge the Council to ensure a greater flexibility within the housing mix policy to meet local needed and ensure site viability. In regards to requiring 10% if dwelling to meet building regs M4(2), there is no evidence to justify this approach. It is unclear how the ageing population will need 10% of new homes to be of this standard. The optional M4(2) should be introduced on a need to have rather than nice to have basis. It is important that the Council recognises the viability implication of requiring all houses to meet these enhanced standards. The evidence on viability is very vague and this policy should be further tested in regards to viability.	Barratt David Wilson Homes (BDW) consider that the Local Plan should not dictate the housing mix across the city, it is unnecessary and inflexible. The policy should encourage rather than require. BDW would urge the Council to ensure a greater flexibility within the housing mix policy to meet local needed and ensure site viability. In regards to requiring 10% if dwelling to meet building regs M4(2), there is no evidence to justify this approach. It is unclear how the ageing population will need 10% of new homes to be of this standard. The optional M4(2) should be introduced on a need to have rather than nice to have basis. It is important that the Council recognises the viability implication of requiring all houses to meet these enhanced standards. The evidence on viability is very vague and this policy should be further tested in regards to viability.		Barratt David Wilson Homes (BDW) consider that the Local Plan should not dictate the housing mix across the city, it is unnecessary and inflexible. The policy should encourage rather than require. BDW would urge the Council to ensure a greater flexibility within the housing mix policy to meet local needed and ensure site viability. In regards to requiring 10% if dwelling to meet building regs M4(2), there is no evidence to justify this approach. It is unclear how the ageing population will need 10% of new homes to be of this standard. The optional M4(2) should be introduced on a need to have rather than nice to have basis. It is important that the Council recognises the viability implication of requiring all houses to meet these enhanced standards. The evidence on viability is very vague and this policy should be further tested in regards to viability.	Barratt David Wilson Homes (BDW) consider that the Local Plan should not dictate the housing mix across the city, it is unnecessary and inflexible. The policy should encourage rather than require. BDW would urge the Council to ensure a greater flexibility within the housing mix policy to meet local needed and ensure site viability. In regards to requiring 10% if dwelling to meet building regs M4(2), there is no evidence to justify this approach. It is unclear how the ageing population will need 10% of new homes to be of this standard. The optional M4(2) should be introduced on a need to have rather than nice to have basis. It is important that the Council recognises the viability implication of requiring all houses to meet these enhanced standards. The evidence on viability is very vague and this policy should be further tested in regards to viability.	Remove the approach to housing mix and remove policy requirement iv.	The policy is considered to be flexible, by stating that developments should contribute to meeting housing needs as identified through the SHMA or other evidence, rather than setting out that developments must provide. It is considered that the evidence as set out within the SHMA justifies the reasoning behind the policy requirement for accessible and adaptable homes. Further information is contained in the Accessible Homes Report and the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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KARBON HOMES			PD3386	Policy	H1	Support with mods			Generally support Policy H1, however suggest an amendment to point iv to allow for schemes not to deliver this requirement if it would make a scheme unviable. Strongly support point 2. Would like more detail to be included within the Policy regarding accommodation for older persons.			Generally support Policy H1, however suggest an amendment to point iv to allow for schemes not to deliver this requirement if it would make a scheme unviable. Strongly support point 2. Would like more detail to be included within the Policy regarding accommodation for older persons.	Include caveat in point 1iv to allow for this not to be delivered if it would make a scheme unviable. Include more detail in Policy on older person's accommodation.	With regards requiring more detail in the policy on accommodation for older people, in particular the shortage of bungalows. The policy itself makes reference to bungalows and ensuring choice of suitable accommodation for older people. The background text also references the SHMA and low stock levels of bungalows in 6.10 and 6.12 refers to alternative designs and layouts for older people's accommodation. The Council propose an additional modification to paragraph 6.12 to address this representation (M36).	(2) Category 2 - accessible and adaptable dwellings. However, low-rise non-lifted serviced flats will be excluded due to not being able to achieve step-free access. <u>The council does recognise that in some instances, it may not be possible to deliver the accessible and adaptable dwellings requirement in full. In this instance the applicant will be expected to submit a detailed viability assessment to clearly demonstrate how the requirement set out within Policy H1 (iv) would make the scheme unviable.</u>	
Ray	Delaney		PD33	Policy	H1	Object		The policy is objected to on the grounds that housing mix should include provision of a range of sites, executive homes should be included in criterion 1 in accordance with the SHMA and criterion 3 should be amended to deliver self build dwellings which contribute to the supply.	The policy is objected to on the grounds that housing mix should include provision of a range of sites, executive homes should be included in criterion 1 in accordance with the SHMA and criterion 3 should be amended to deliver self build dwellings which contribute to the supply.			The policy is objected to on the grounds that housing mix should include provision of a range of sites, executive homes should be included in criterion 1 in accordance with the SHMA and criterion 3 should be amended to deliver self build dwellings which contribute to the supply.	The policy is objected to on the grounds that housing mix should include provision of a range of sites, executive homes should be included in criterion 1 in accordance with the SHMA and criterion 3 should be amended to deliver self build dwellings which contribute to the supply.	Include a range of sites including smaller sites suitable for small and medium builders. In criterion (i) reference executive housing. Reword criterion (iii), support self build.	Reference is made to developments contributing to meeting the needs as identified through the SHMA within this criteria and it is not considered that the provision of executive dwellings needs to be referenced separately in this part of the policy. 'Executive dwellings' is not a phrase referenced within the plan. The intention of the policy is to encourage self-builds schemes of all sizes, as such it is suggested that additional wording is included within the background text to make this clearer. The Council propose an additional modification to paragraph 6.13 to address this representation (M38).	To assist people who want to build their own home, the council will support appropriate <u>self-build developments</u> as well as seek to identify appropriate small sites to assist in the delivery of self-build/custom house building plots.
Taylor Wimpey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2454	Policy	H1	Object	Object to Policy H1 on the grounds that the 10% requirement for homes to meet building regulations M2(2) Category would be onerous and has not been evidenced as required by the Government's Written Ministerial Statement and the PPG. Concern that it could affect site viability and make it more difficult to deliver housing targets.				Object to Policy H1 on the grounds that the 10% requirement for homes to meet building regulations M2(2) Category would be onerous and has not been evidenced as required by the Government's Written Ministerial Statement and the PPG. Concern that it could affect site viability and make it more difficult to deliver housing targets.	Object to Policy H1 on the grounds that the 10% requirement for homes to meet building regulations M2(2) Category would be onerous and has not been evidenced as required by the Government's Written Ministerial Statement and the PPG. Concern that it could affect site viability and make it more difficult to deliver housing targets.	Remove the requirement for accessible and adaptable dwellings.	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirement in relation to accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018, confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Dominic	Smith	Esh Developments Ltd	PD1912	Policy	H1	Object	Objects to H1(iv) - there is a lack of robust evidence to arrive at the 10% requirement of new dwellings on major development sites to be adaptable, the policy in its current is not considered sound and as written should be removed from the Plan.				Objects to H1(iv) - there is a lack of robust evidence to arrive at the 10% requirement of new dwellings on major development sites to be adaptable, the policy in its current is not considered sound and as written should be removed from the Plan.		Policy H1 removed or adequately evidenced.	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirement for accessible and adaptable dwellings. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 see paras, confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Taylor Wimpey	Taylor Wimpey	Taylor Wimpey	PD3697	Policy	H1	Object						Objects to H1(iv) - there is a lack of robust evidence to arrive at the 10% requirement of new dwellings on major development sites to be adaptable, the policy in its current is not considered sound and as written should be removed from the Plan.	Taylor Wimpey suggests that Policy H1 (1) (iv) is deleted to ensure a sound CSDP.	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirements for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Jennifer	Nye	Hellens Land Ltd	PD5039	Policy	H1	Object	Objects to H1(iv) - there is a lack of robust evidence to arrive at the 10% requirement of new dwellings on major development sites to be adaptable, the					Objects to H1(iv) - there is a lack of robust evidence to arrive at the 10% requirement of new dwellings on major development sites to be adaptable, the	Recommended that Policy H1 (1) (iv) is deleted to ensure a sound CSDP.	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirement for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no	

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							policy in its current is not considered sound and as written should be removed from the Plan.				policy in its current is not considered sound and as written should be removed from the Plan.			with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1937	Policy	H1	Object		Objects to Policy H1 on the grounds that it is overly restrictive. Concern that the introduction of accessibility standards is not justified by robust evidence. Consider that the onus should be on the Council to demonstrate that need for older person's accommodation and self-build housing exists, rather than on the developer to evidence that it doesn't.			Objects to Policy H1 on the grounds that it is overly restrictive. Concern that the introduction of accessibility standards is not justified by robust evidence. Consider that the onus should be on the Council to demonstrate that need for older person's accommodation and self-build housing exists, rather than on the developer to evidence that it doesn't.	Objects to Policy H1 on the grounds that it is overly restrictive. Concern that the introduction of accessibility standards is not justified by robust evidence. Consider that the onus should be on the Council to demonstrate that need for older person's accommodation and self-build housing exists, rather than on the developer to evidence that it doesn't.	Robust evidence required to justify 10% requirement for new homes to be built to accessibility standards and parts 2 and 3 of policy revised to make clear that Council must demonstrate need for older person's accommodation and self-build plots.	It is considered that the evidence as set out within the SHMA justifies the reasoning behind the policy requirement in relation to accessible and adaptable dwellings. The Whole Plan Viability Assessment, August 2017 considered the costs associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note (2018) confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan. Part 2 of the policy is worded as such that it is not a requirement of all housing schemes to provide accommodation for older people, where appropriate and where it can be justified through evidence the council would then request that accommodation for older people is incorporated into housing schemes. This intention of this aspect of the policy is such that the council through their evidence base, be that the SHMA, Housing Strategy or specialist housing studies identify where there is a particular need for developers to consider within housing schemes. The Council proposes an additional modification to clarify this representation (M37).	6.12 In order to ensure choice in the housing stock for the city's ageing population developments should consider alternative designs and layouts to provide for those older people who may want to stay in their own home and take on board appropriate evidence to ensure suitable accommodation for older people and those with special housing needs is provided, where a need is demonstrated.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3017	Policy	H1	Object					Objects to Policy H1 on the grounds that proposals to deliver large family homes is not sustainable or justified and that a policy to re-unify buildings which have been subdivided would be easier and more deliverable.		Amend Policy to promote reunification of subdivided buildings.	The need for these types of properties is evidenced through the SHMA (2017), in order to rebalance the housing stock within the city more closely with need and aspirations of Sunderland residents. Where appropriate the council encourage converting residential properties back into single households where they have previously been divided into a number of smaller units. However the council recognise that to convert back to a single large dwelling house is not always viable and as such a policy requirement of this nature would not be deliverable. Policy H6 Homes in Multiple Occupation is in place to manage properties being converted to HMOs.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Scott	Metcalf		PD806	Policy	H1	Object		Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.	Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.		Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.		No modifications proposed.	Policy H5 of the CSDP seeks to manage the existing housing stock by bringing empty properties back into use and supporting programmes of improvement, renewal and replacement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Hilary	Metcalf		PD972	Policy	H1	Object		Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.	Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.		Objects to Policy H1, stating that more needs to be done to bring empty properties back into use before developing beyond the centre of the city.		No modifications proposed.	Policy H5 of the CSDP seeks to manage the existing housing stock by bringing empty properties back into use and supporting programmes of improvement, renewal and replacement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	Ms. Taylor & Ms. McClelland		PD4315	Policy	H1	Object			Policy H1 does not appear to meet the needs of those wanting to self-build. The consultee's proposed site at Hutton Close, Houghton-le-Spring would provide such a site.				Exclude the Hutton Close site from the settlement break designation.	Policy H1, point 3 references self-builds, however it is accepted that this could be clearer in terms of supporting all self-builds, as such the council intends to include reference to supporting all appropriate self-build developments, whether this be on inclusion on a larger site or separate self-build sites. The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy), as well as a specific response relating to the site proposed for development at Hutton Close (see Policy SP6 The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McClelland	Story Homes	PD861	Policy	H1	Object						Story Homes does not consider the requirement for 10%	Story Homes consider that Sub point "iv" should be	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the	The Council considers there have been no soundness or legal

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												of dwelling to meet M4(2) justified or consistent with national policy. The Council need to provide a robust local assessment that evidences the specific requirement for Sunderland to justify the optional higher standards, this should include likely future need, the size, location, type and quality of tenure required, the accessibility and adaptability of the existing housing stock, an assessment of how the needs vary across different housing tenures and the impact of overall Plan viability. There is a lack of evidence to justify this approach. This will have a negative impact on affordable housing provision and could inflate house prices. An assessment should be undertaken by the Council to assess likely impacts and the Council should also set out the associated costs, viability implications and any other issues that may arise.	deleted to ensure that Policy H1 is sound.	reasoning behind the policy requirements for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Alan	Hutchinson		PD2050	Policy	H1	Support						Strongly support the reference within H1 and the supporting text to self-build and custom house developments. Land at Glebe House Farm would be suitable in this respect.	No modifications proposed.	Land at Glebe House Farm is to be retained as Green Belt, see the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3042	Policy	H1	Object			Support principle of delivering a diverse housing mix. However, the policy is not justified or effective because the requirement to deliver 10% of dwellings for accessible and adaptable dwellings does not account for viability of development.			Support principle of delivering a diverse housing mix. However, the policy is not justified or effective because the requirement to deliver 10% of dwellings for accessible and adaptable dwellings does not account for viability of development.	Policy should be reworded to encourage developers, wherever possible, subject to viability and scheme specifics, to consider the inclusion of dwellings which comply with Building Regs M4 (2).	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirements for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WYNYARD HOMES		Wynyard Homes	PD4698	Policy	H1	Support with mods						Support principle of Policy H1 to create mixed and sustainable communities. There is evidence of need for larger family homes and bungalows, so requiring this as part of larger housing sites is supported. Support the development to consider the inclusion of self-build and custom build plots, but this should not be a requirement and considered on a site by site basis.	Remove requirement for self and custom built plots from Policy H1 and consider this on a site by site basis.	The intention of the policy in relation to self-build and custom house building is for developments to consider the inclusion, it is not a requirement. It is proposed to amend the background text to make clearer that the policy also supports appropriate self-build developments. The Council propose an additional modification to paragraph 6.13 to address this representation (M38).	To assist people who want to build their own home, the council will <u>support appropriate self-build developments as well as</u> seek to identify appropriate small sites to assist in the delivery of self-build/custom house building plots.
Amy F	Ward	Barratt David Wilson Homes	PD1616	Policy	H1	Object		Support principle of providing a broad mix of housing, however the Local Plan should not dictate the housing mix and the Policy should be flexible. Particularly concerned by	Support principle of providing a broad mix of housing, however the Local Plan should not dictate the housing mix and the Policy should be flexible. Particularly concerned by		Support principle of providing a broad mix of housing, however the Local Plan should not dictate the housing mix and the Policy should be flexible. Particularly concerned by	Support principle of providing a broad mix of housing, however the Local Plan should not dictate the housing mix and the Policy should be flexible. Particularly concerned by	Remove the onerous and prescriptive approach to the housing mix, size and tenure on sites. The Policy should be amended to encourage or reflect rather than ensure or require. Remove	The policy is not considered to be onerous and prescriptive, it is considered to be flexible, by stating that developments should contribute to meeting housing needs as identified through the SHMA or other evidence, rather than setting out that developments "must" provide. The evidence as set out within the SHMA and Accessible Homes Report	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object/Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
								requirement to provide 10% of dwellings to building regulations M4(2) category 2 standard. The evidence base does not justify the Council's position and is not consistent with the requirements set out in the PPG or the Written Ministerial Statement of 25 March 2015.	requirement to provide 10% of dwellings to building regulations M4(2) category 2 standard. The evidence base does not justify the Council's position and is not consistent with the requirements set out in the PPG or the Written Ministerial Statement of 25 March 2015.		requirement to provide 10% of dwellings to building regulations M4(2) category 2 standard. The evidence base does not justify the Council's position and is not consistent with the requirements set out in the PPG or the Written Ministerial Statement of 25 March 2015.	requirement to provide 10% of dwellings to building regulations M4(2) category 2 standard. The evidence base does not justify the Council's position and is not consistent with the requirements set out in the PPG or the Written Ministerial Statement of 25 March 2015.	stem iv from the policy requiring 10 percent of dwellings to be provided as accessible and adaptable homes.	justifies the reasoning behind the requirement for developments to meet Building Regulations M4 (2) Category 2 - accessible and adaptable dwellings. In terms of viability, the Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	
Adam	McVickers	Persimmon Homes (Durham)	PD4004	Policy	H1	Object						Support step change in policy to ensure the housing requirement is met over the plan period and the positive step of releasing Green Belt to achieve this. Point H1 (1iii) should seek to optimise density and promote an uplift in town and city centres and locations well served by public transport. Object to the requirement for 10% of dwellings to meet building regulations M4 (2) Category 2 is not justified or consistent with national policy. There is a lack of evidence to justify this requirement and there are concerns over the impact on viability. Object to requirement for older person's accommodation as this is not justified, evidence based and the viability implications have not been tested.	Amend Point 1(iii) of the policy to promote higher densities in town and city centres and locations well served by public transport. Delete Point 1 (iv). Delete Point 2 (ii).	Through this policy higher densities will be encouraged in locations which have good public transport locations and are located in close proximity to centres. With regards development optimising density, this is included within NPPF 2018 and as this plan is to be submitted through the transitional arrangements the policies are in compliance with the National Planning Policy Framework 2012. It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy requirement for accessible and adaptable developments. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan. The policy is worded as such that it is not a requirement of all housing schemes to provide accommodation for older people, where appropriate and where it can be justified through evidence the council would then request that accommodation for older people is incorporated into housing schemes. The intention of this aspect of the policy is such that the council through their evidence base, be that the SHMA, Housing Strategy or specialist housing studies identify where there is a particular need for developers to consider within housing schemes	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Joanne	Harding	Home Builders Federation	PD4685	Policy	H1	Object		HBF do not consider the policy to be sound. The HBF is generally supportive of providing homes for older and disabled persons, however if the Councils seeks to apply the optional standards for accessible and adaptable homes it should be done in accordance with the PPG. The evidence to justify this policy is lacking. It is not clear how the ageing population and potential future need reflects in the need for 10% of all new homes on site of 10 or more dwellings provided at M4(2). Whilst information is provided in relation to the number of households living in adapted properties, details are not included as to whether these adaptations are in line with requirements of M4(2). No information is provided in relation to the adaptability and accessibility of	HBF do not consider the policy to be sound. The HBF is generally supportive of providing homes for older and disabled persons, however if the Councils seeks to apply the optional standards for accessible and adaptable homes it should be done in accordance with the PPG. The evidence to justify this policy is lacking. It is not clear how the ageing population and potential future need reflects in the need for 10% of all new homes on site of 10 or more dwellings provided at M4(2). Whilst information is provided in relation to the number of households living in adapted properties, details are not included as to whether these adaptations are in line with requirements of M4(2). No information is provided in relation to the adaptability and accessibility of the existing stock, or		HBF do not consider the policy to be sound. The HBF is generally supportive of providing homes for older and disabled persons, however if the Councils seeks to apply the optional standards for accessible and adaptable homes it should be done in accordance with the PPG. The evidence to justify this policy is lacking. It is not clear how the ageing population and potential future need reflects in the need for 10% of all new homes on site of 10 or more dwellings provided at M4(2). Whilst information is provided in relation to the number of households living in adapted properties, details are not included as to whether these adaptations are in line with requirements of M4(2). No information is provided in relation to the adaptability and accessibility of the existing stock, or	HBF do not consider the policy to be sound. The HBF is generally supportive of providing homes for older and disabled persons, however if the Councils seeks to apply the optional standards for accessible and adaptable homes it should be done in accordance with the PPG. The evidence to justify this policy is lacking. It is not clear how the ageing population and potential future need reflects in the need for 10% of all new homes on site of 10 or more dwellings provided at M4(2). Whilst information is provided in relation to the number of households living in adapted properties, details are not included as to whether these adaptations are in line with requirements of M4(2). No information is provided in relation to the adaptability and accessibility of the existing stock, or	1.iv. is deleted - requiring 10% if dwellings on development of 10 or more to meet building regulations M4(2) Category 2 - accessible and adaptable dwellings.	It is considered that the evidence as set out within the SHMA and Accessible Homes Report justifies the reasoning behind the policy. The Whole Plan Viability Assessment, August 2017 considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								the existing cock or the size location type and quality of dwelling needed based on future demand.	the size, location, type and quality of dwelling needed based on future demand.		the size, location, type and quality of dwelling needed based on future demand.	the size, location, type and quality of dwelling needed based on future demand.			
	Unknown	Harworth Estates	PD2139	Paragraph	6.1	Object		Broad support for paragraph to deliver more family homes, but plan not positively prepared due to its open countryside policies and failure to take into account the unmet requirements from neighbouring authorities.	There is an historic under-delivery of executive and family houses in Sunderland, and by failing to consider the Ryehill site, the plan is therefore not effective.			The evidence for housing delivery does not support the strategy and therefore is not justified.	No modifications proposed.	The plan recognises the city's shortfall of larger detached dwellings and as such has put policies in place to assist in delivering these house types. The allocation of housing sites other than strategic sites and HGA's will be set out within the Allocations and Designations Plan rather than this strategic plan. However, the Ryehill site is not considered suitable for housing development due to the site constraints, its proximity to Rainton Meadows Nature Reserve and being a greenfield site within the open countryside. Further guidance is contained within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD5439	Policy	H2	Object		Barratt David Wilson Homes (BDW) is supportive of the need for affordable homes and supports 15% target, but suggest a split of 70% affordable rent and 30% intermediate. BDW is concerned that all the policy requirements could undermine the provision of affordable housing through the need for a viability assessment. The Council should ensure all of the policy requirements are tested in regards to viability.	Barratt David Wilson Homes (BDW) is supportive of the need for affordable homes and supports 15% target, but suggest a split of 70% affordable rent and 30% intermediate. BDW is concerned that all the policy requirements could undermine the provision of affordable housing through the need for a viability assessment. The Council should ensure all of the policy requirements are tested in regards to viability.		Barratt David Wilson Homes (BDW) is supportive of the need for affordable homes and supports 15% target, but suggest a split of 70% affordable rent and 30% intermediate. BDW is concerned that all the policy requirements could undermine the provision of affordable housing through the need for a viability assessment. The Council should ensure all of the policy requirements are tested in regards to viability.	Barratt David Wilson Homes (BDW) is supportive of the need for affordable homes and supports 15% target, but suggest a split of 70% affordable rent and 30% intermediate. BDW is concerned that all the policy requirements could undermine the provision of affordable housing through the need for a viability assessment. The Council should ensure all of the policy requirements are tested in regards to viability.	Amend the tenure split to 70% and 30%. Ensure the policy is tested in terms of viability and have a flexible approach to affordable homes.	It is not considered that the affordable housing needs of the city's existing and future residents will be met by specifying this tenure split. Evidence through the 2017 SHMA indicates an overall preference for 79.4% social/affordable rent. In addition to this, the viability work suggested that a 80/20 split should not be detrimental to viability and the policy as set out is considered flexible enough to allow this tenure split to be negotiated if viability is an issue.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3387	Policy	H2	Support with mods			Point 2 of the Policy is limiting to certain tenures including rent to buy and this point should be deleted from Policy H2.			Generally support Policy H2, but would like the definition to accord with the revised NPPF to allow more flexibility.	Amend Policy H2 to make the affordable housing definition consistent with the revised NPPF. Delete Point 2 of the Policy.	The plan is being submitted under transitional arrangements as such it is in compliant with the NPPF 2012 rather than the 2018 version. It is not considered appropriate to remove the requirement for affordable dwellings to be retained in affordable use in perpetuity, as this would remove affordable stock from the city and limit the choice of properties for existing and future residents. The requirement is also in line with the NPPF.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Joanne	Harding	Home Builders Federation	PD4738	Policy	H2	Object		HBF objects to policy H2 and the requirement for 15% affordable housing given the Whole Plan Viability Assessment (2017) which identifies that brownfield sites are unviable. It is not realistic to negotiate on a site by site basis, this would jeopardise future delivery of sites.	HBF objects to policy H2 and the requirement for 15% affordable housing given the Whole Plan Viability Assessment (2017) which identifies that brownfield sites are unviable. It is not realistic to negotiate on a site by site basis, this would jeopardise future delivery of sites.		HBF objects to policy H2 and the requirement for 15% affordable housing given the Whole Plan Viability Assessment (2017) which identifies that brownfield sites are unviable. It is not realistic to negotiate on a site by site basis, this would jeopardise future delivery of sites.	HBF objects to policy H2 and the requirement for 15% affordable housing given the Whole Plan Viability Assessment (2017) which identifies that brownfield sites are unviable. It is not realistic to negotiate on a site by site basis, this would jeopardise future delivery of sites.	Amended the requirement for 15% affordable homes and ensure flexibility is built into this policy to allow for consideration of viability and other constraints to affordable housing delivery.	Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance. SCC's Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied). In recognition that the full 15% may not be deliverable on all sites, particularly brownfield sites, the policy allows flexibility for the affordable housing requirement to be reduced down and the tenure split to be reviewed on a site by site basis subject to a detailed viability assessment.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens Group	PD243	Policy	H2	Object						Hellens recognises that Policy H2 requires a 15% provision of affordable housing, however considers paragraph 6.18, which advises that the council will seek a tenure split of 80% affordable rent and 20% intermediate tenure is too prescriptive. A more flexible approach should be adopted, particularly recognising the range of types of affordable housing references in Annex 2 of the NPPF	Amended supporting text to remove the tenure split of 80% affordable rent and 20% intermediate tenure.	It is not considered that the affordable housing needs of the city's existing and future residents will be met by removing the tenure split. Evidence through the 2017 SHMA indicates an overall preference for 79.4% social/affordable rent. In addition to this, the viability work suggested that a 80/20 split should not be detrimental to viability and the policy as set out is considered flexible enough to allow this tenure split to be negotiated if viability is an issue	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Caroline	Strugnell	Bellway Homes Ltd	PD1946	Policy	H2	Object		Objects to Policy H2 on the grounds that the affordable housing requirement is too high and will affect site viability. A significant number of applications would require viability assessments which would place additional burden on developers.		Objects to Policy H2 on the grounds that the affordable housing requirement is too high and will affect site viability. A significant number of applications would require viability assessments which would place additional burden on developers.	(2018). Objects to Policy H2 on the grounds that the affordable housing requirement is too high and will affect site viability. A significant number of applications would require viability assessments which would place additional burden on developers.	Consider revising affordable housing requirement down.	Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance as set out in the SHMA 2017. SCC's Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3026	Policy	H2	Object		Policy H2 as it currently stands is not effective. The delivery of 15% affordable homes is restrictive and should be an ambition to deliver where possible, or where viability of a site is not an issue, as with the current policy. The requirement for clusters should also be removed from the policy.				Alter Policy H2 to remove requirement for clustering, and to revise wording on affordable homes to state that this is an ambition to deliver where possible or where viability is not an issue.	Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance as identified through the SHMA 2017. SCC Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied). Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. The Council propose an additional modification to paragraph 6.21 to address this representation (M40).	In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2506	Policy	H2	Support with mods					Policy H2 requires an affordable housing provision of at least 15% and a tenure split of 80/20 in favour of affordable rent. The SSGA requires 10% provision and 75/25 tenure split. Reference should be made to differences for the SSGA for clarity and transparency. Concerned that policy requirement for at least 15% affordable homes is open ended and imprecise. Higher levels of affordable housing have not been tested for viability. The policy is overly prescriptive with regard to the size of small clusters. Concern that requirement for affordable housing to be indistinguishable in appearance from market housing is too restrictive. Support Paragraph 6.23.	Amend Policy H2 to remove reference to small clusters, change indistinguishable in appearance to similar design and building standard and make clear in supporting text that the affordable housing requirement for the SSGA would be 10%	Reference can be made in the background text to the SSGA and affordable housing requirements being different and cross reference with policy SS6. Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance as identified through the SHMA 2017. SCC Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied). Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. This will be made as a modification to the background text. Ensuring the affordable properties are indistinguishable from market housing allows for better integration and avoids the affordable housing being immediately identified. The Council propose an additional modification to paragraph 6.16 and 6.21 to address this representation (M39 and M40).	Policy H2 sets out the council's approach for the delivery of affordable housing when developments propose more than 10 dwellings. Refer to Policy SS6 for affordable housing requirements within the South Sunderland Growth Area (SSGA). In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>
Nick	McClellan	Story Homes	PD982	Policy	H2	Object		Story Homes consider that a lower affordable housing target would be more appropriate as it would not negatively impact on future housing delivery. It is not effective, justified or consistent with national policy to require "at least" as it is not transparent. The supporting text is welcomed which recognises that in some instances it may not be possible to deliver affordable homes. Sub-point 3 is supported, however the requirement for clusters of 3-4 dwellings is considered too restrictive, as is the requirement of sub point 4 which seeks for affordable homes to be		Story Homes consider that a lower affordable housing target would be more appropriate as it would not negatively impact on future housing delivery. It is not effective, justified or consistent with national policy to require "at least" as it is not transparent. The supporting text is welcomed which recognises that in some instances it may not be possible to deliver affordable homes. Sub-point 3 is supported, however the requirement for clusters of 3-4 dwellings is considered too restrictive, as is the requirement of sub point 4 which seeks for affordable homes to be	Story Homes consider that a lower affordable housing target would be more appropriate as it would not negatively impact on future housing delivery. It is not effective, justified or consistent with national policy to require "at least" as it is not transparent. The supporting text is welcomed which recognises that in some instances it may not be possible to deliver affordable homes. Sub-point 3 is supported, however the requirement for clusters of 3-4 dwellings is considered too restrictive, as is the requirement of sub point 4 which seeks for affordable homes to be	H2 policy modification proposal: ...when part of a mixed housing scheme, should and where practical, be grouped in small clusters throughout the site at appropriate locations; and Supporting text proposal at para 6.21: In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters where practical and viable. (3 or 4 dwellings per cluster). Therefore all affordable housing provision should be indistinguishable from other	Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance as identified through the SHMA 2017. SCC Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied). Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. Ensuring the affordable properties are indistinguishable from market housing allows for better integration and avoids the affordable housing being immediately identified. The Council propose an additional modification to paragraph 6.21 to address this representation (M40).	In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>

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								indistinguishable in appearance from market housing.			indistinguishable in appearance from market housing.	indistinguishable in appearance from market housing.	development on the site		
Amy F	Ward	Barratt David Wilson Homes	PD1621	Policy	H2	Object		Support need for affordable housing and the 15% requirement, but feel that the tenure split should be 70% affordable rent and 30% intermediate tenure. Concerned that policy requirement may impact site viability and the need to undertake site specific viability assessments on a regular basis.	Support need for affordable housing and the 15% requirement, but feel that the tenure split should be 70% affordable rent and 30% intermediate tenure. Concerned that policy requirement may impact site viability and the need to undertake site specific viability assessments on a regular basis.		Support need for affordable housing and the 15% requirement, but feel that the tenure split should be 70% affordable rent and 30% intermediate tenure. Concerned that policy requirement may impact site viability and the need to undertake site specific viability assessments on a regular basis.	Support need for affordable housing and the 15% requirement, but feel that the tenure split should be 70% affordable rent and 30% intermediate tenure. Concerned that policy requirement is well tested in viability terms.		It is not considered that the affordable housing needs of the city's existing and future residents will be met by specifying this tenure split. Evidence through the 2017 SHMA indicates an overall preference for 79.4% social/affordable rent. In addition to this, the viability work suggested that a 80/20 split should not be detrimental to viability and the policy as set out is considered flexible enough to allow this tenure split to be negotiated if viability is an issue.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
WYNYARD HOMES		Wynyard Homes	PD4701	Policy	H2	Support with mods						Support Policy H2 in principle, but consider that the text from Paragraph 6.23 should be incorporated into the Policy.	Amend Policy H2 to incorporate text from Paragraph 6.23.	To include the text from paragraph 6.23 into the policy would make the policy quite lengthy and policies should be succinct. Information that is set out within background text still carries weight and has to be complied with.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dominic	Smith	Esh Developments Ltd	PD1922	Policy	H2	Support with mods						Supports the policy (and supporting 6.23 text on viability). Recommends an alteration to paragraph 6.21 that clustering should not be prescriptive in terms of the size of each cluster and proportionate to the scale of the overall development. The wording should be amended to better reflect the RP's requirements that the housing they manage should be closely related for operational purposes.	Paragraph 6.21 should be amended as follows: "In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-sites should be clustered amongst market housing in clusters proportionate to the scale of development"	Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. The Council propose an additional modification to paragraph 6.21 to address this representation (M40).	In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>
Taylor Wimpey	Taylor Wimpey	PD3722	Policy	H2	Support with mods							Supports the policy (and supporting 6.23 text on viability). Recommends an alteration to paragraph 6.21 that clustering should not be prescriptive in terms of the size of each cluster and proportionate to the scale of the overall development. The wording should be amended to better reflect the RP's requirements that the housing they manage should be closely related for operational purposes.	Taylor Wimpey suggests that paragraph 6.21 is amended to state to ensure the CSDP is justified and sound in accordance with the NPPF (para. 182): "In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters (3 or 4 dwellings per cluster)."	Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. The Council propose an additional modification to paragraph 6.21 to address this representation (M40).	In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>
Jennifer	Nye	Hellens Land Ltd	PD5047	Policy	H2	Support with mods						Supports the policy (and supporting 6.23 text on viability). Recommends an alteration to paragraph 6.21 that clustering should not be prescriptive in terms of the size of each cluster and proportionate to the scale of the overall development. The wording should be amended to better reflect the RP's requirements that the housing they manage should be closely related for operational purposes.	Paragraph 6.21 should be amended as follows: "In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-sites should be clustered amongst market housing in clusters proportionate to the scale of development"	Following further consideration it is agreed that the size of the cluster should be proportionate to the scale of the overall development. The Council propose an additional modification to paragraph 6.21 to address this representation (M40).	In order to create balanced, mixed and sustainable communities, the provision of affordable housing on-site should be dispersed amongst the market housing in clusters of a size <u>proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>
Laura	Roberts	Northumbrian Water	PD2700	Paragraph	6.23	Support						Supports paragraph 6.23 that it may not always be possible to deliver affordable housing, and support	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this

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												the approach that applicants will be expected to submit a viability assessment to demonstrate how the affordable housing requirement set out within Policy H2 would make the scheme unviable.			representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3018	Policy	H2	Object						The 15% requirement is too low. Affordability is not a problem in Sunderland.	No modifications proposed.	SCC's Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4045	Policy	H2	Object						To ensure that Policy H2 remains beyond the transitional arrangements, the 10% requirement for homes to be made available for affordable home ownership should be included and the affordable housing definition in the glossary revised. Object to the 15% affordable housing requirement. Concern that cumulative impacts of other policy requirements in the Plan will affect viability. A large proportion of urban sites would not be viable with a 15% affordable housing requirement. Disagree with the residual values used in the whole plan viability assessment. The affordable housing requirement should be reduced, the housing requirement increased and the policy allow for flexibility on tenure split when viability is an issue.	Re-run the viability assessment based on the residual values set out in Paragraph 10.19 of the Viability Assessment, reduce the affordable housing requirement and meet affordable need through an increase in the overall housing requirement. Provide additional flexibility by allow changes to the tenure split when viability is an issue.	The plan is to be submitted via the transitional arrangements and as such is in compliance with NPPF 2012 and is not required to include 10% of affordable homes for home ownership, nor revise the definition within the glossary. Any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance as identified through the SHMA 2017. SCC's Whole Plan Viability Assessment indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable (brownfield sites are not considered viable even before any affordable housing percentage is applied). The viability work suggested that a 80/20 split should not be detrimental to viability and the policy as set out is considered flexible enough to allow this tenure split to be negotiated if viability is an issue.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Andrew	Stone		PD124	Policy	H4	Object				Objects to land being allocated for Travelling Showpeople as the demand for such sites has not been successfully proven and justified and is not in the public interest.	Objects to land being allocated for Travelling Showpeople as the demand for such sites has not been successfully proven and justified and is not in the public interest.		Remove paragraphs 1.i & 1.ii from Policy H4	Sunderland's Gypsy and Traveller and Travelling Showpeople Accommodation Assessment Update (2017) identifies the need for a total of 33 plots for Travelling Showpeople in the SCC area over the CSDP plan period to 2033, of which 15 plots are required in the short term (up to 2022/23) and a further 18 plots in the medium to longer term. The Council have actively sought to identify appropriate sites for travelling showpeople and the full details of these are set out within the "Sunderland City Council Travelling Showpeople and Gypsy and Traveller accommodation needs and provision report 2017, section 6, paras 6.1-6.6, pg 4-5. The criteria considered for sites included, having access to health facilities and schools, not being detrimental to residential amenities and highway safety, being appropriate for a live/work lifestyle and not creating significant intrusion into the landscape. It is considered that due to the peripheral location of this site in relation to the industrial estate, it is not considered that the existing uses on the estate will be detrimental to the amenity of proposed residents of the site and any noise impact on existing residential properties to the south at Lake Road and to the west will be limited as fairground equipment could be stored and maintained to the southern or eastern most part of the site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Andre	Stone		PD123	Policy	H4	Object				Objects to land being		Objects to land being	Remove paragraphs i	Sunderland's Gypsy and Traveller and	The Council considers

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w									allocated for Travelling Showpeople as the demand for such sites has not been successfully proven and justified and is not in the public interest.			allocated for Travelling Showpeople as the demand for such sites has not been successfully proven and justified and is not in the public interest.	& ii from Policy H4.	Travelling Showpeople accommodation Assessment Update (2017) identifies the need for a total of 33 plots for Travelling Showpeople in the SCC area over the CSDP plan period to 2033, of which 15 plots are required in the short term (up to 2022/23) and a further 18 plots in the medium to longer term.	there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3055	Policy	H3	Object						Objects to Policy H3 on the grounds that recent university statistics suggest the student population is falling and likely to fall further.	No modifications proposed.	The University have plans and strategies in place to target students in its key growth areas and those of the region, which the CSDP supports to assist in making Sunderland an entrepreneurial, University City. This policy is in place to ensure that the new student accommodation meets the needs of students, in terms of its location and its quality.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Pine		PD459	Policy	H4	Object						Objects to the identification of Market Place Industrial Estate as a proposed site for travellers in Policy H4 on the grounds that is not the most appropriate strategy compared to other alternatives. Concerns over access arrangements, impact on local road network, safety concerns for local children, noise concerns. 38 sites were discounted for the location not being very accessible, visually intrusive or for highway safety issues. All these issues apply to this site. If the site was extended it would be a significant intrusion into the landscape.	The Market Place Industrial Estate allocation should be removed from Policy H4.	Due to the peripheral location of this site in relation to the industrial estate, it is not considered that the existing uses on the estate will be detrimental to the amenity of proposed residents of the site. Screening could also be put in place between the existing industrial estate and the proposed site. It is also considered that any noise impact on existing residential properties to the south at Lake Road and to the west will be limited as fairground equipment could be stored and maintained to the eastern or southern most part of the site, depending on occupiers needs and consideration can also be given to restricting the hours that fairground equipment can be maintained, so as to avoid any detrimental impacts on existing residential properties nearby. Regarding vehicular access to the site, it is considered that due to the large refuse vehicle that access the site currently, numerous times a day, the amenity issues with large trucks carrying fairground equipment accessing the site intermittently and residents coming to and from the site in private cars, would have no further impact on the amenity of nearby residential properties and would not necessarily result in increased traffic movement. With regards safety issues from these large vehicles and the access point not being wide enough, this has been considered and the access point is considered wide enough as it is currently accessed by large refuse vehicles and the safety element should be no worse due to the current operation of the depot. The area of land identified as a broad location was previously a long standing employment allocation to expand the industrial estate northwards, which was never implemented and as such it is considered that identifying the land as future travelling showpeople site would have no further detrimental impact on the area than an industrial estate would have. The land beyond this is greenbelt and this plan does not seek to release this land from the greenbelt. With regards the 38 sites that were discounted, the reasoning for this is set out within the relevant evidence base.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jenny	Gibbs	University of Sunderland	PD184	Policy	H3	Support with mods						Supports the policy with minor changes. Suggests the policy needs to confirm which elements of the Urban Core are acceptable for student accommodation as it is not supported in the Stadium Village. "Need" for student accommodation should be defined and clarified.	Suggests the following wording of policy H3: "Development of student accommodation should be located within the Urban Core (with the exception of the Stadium Village and preferably either adjacent to or within the University Campus boundary) and must demonstrate that: "Point 1 should read: "there is a need for additional student	Stadium Village is considered a sustainable location in relation to the University Campus at St Peters due to its close proximity and its position in relation to local facilities; as such it would be unreasonable to exclude this area from the Urban Core within this specific policy. The University have agreed with the council in relation to the position on Stadium Village, which has been set out within a statement of common ground. The council agree with a reference to the SPD being included to further define need. The Council and University of Sunderland have signed a Statement of Common Ground (SD.8k) which proposed additional modifications to paragraph 6.28 (M42). Further information on	Notwithstanding the above, student accommodation numbers need to be managed in line with projected student numbers to ensure the city does not end up with an oversupply of accommodation, which cannot be easily converted to other uses. Further information on need is set out in detail within the Student Accommodation SPD.

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													accommodation; and need is defined in accordance with the Student Accommodation SPD".	need is set out in detail within the Student Accommodation SPD.	
Barbara	Hooper	Historic England	PD100	Policy	H5	Support						Historic England supports the intention to bring empty properties back into uses.	No modification proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3019	Policy	H6	Object						Objects to Policy H6 on the grounds that it is not justified as its better to use existing stock as larger houses if there is a need to rebalance the stock.	No modifications proposed.	The policy is in place to manage proposals when they come forward for HMOs to ensure they are not detrimental to existing residential properties and communities. Where appropriate the council encourage converting residential properties back into single households where they have previously been divided into a number of smaller units. However the council recognise that to convert back to a single large dwelling house is not always viable.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jenny	Gibbs	University of Sunderland	PD185	Policy	H6	Support with mods						Supports with minor changes. Suggests amendment to point 5 as it contradicts other housing policy documents which make specific reference to a need to avoid over supply when looking at HMOs and student accommodation collectively.	Suggests amendment to point 5 to read "5. The proposal would not result in an over concentration of HMOs, or student accommodation collectively within the locality".	The Council and University of Sunderland have signed a Statement of Common Ground (SD.8k) which proposed additional modifications to paragraph 6.26 (M41). Further information on need is set out in detail within the Student Accommodation SPD.	Should a proposal come forward that is not located within the Urban Core, the developer will need to demonstrate there are no suitable and available sites to accommodate the proposed development within the Urban Core and that the proposal will not result in an over concentration of student or shared accommodation.
M&G Real Estate			PD3604	Chapter	7	Object		General structure set by the policies in this chapter are appropriate and sound, but there should be a stronger test introduced for changes away from employment uses.	General structure set by the policies in this chapter are appropriate and sound, but there should be a stronger test introduced for changes away from employment uses.				Introduce phased approach to retail requirements.	The chapter sets a proportionate response to change of use on employment land. The chapter sets a balance between protection of employment land to meet projected requirements and allowing change of use to avoid the long term protection where no reasonable prospect of sites coming forward as set out in National Planning Policy Framework Paragraph 22. The Council has set a hierarchy of employment sites (primary employment areas, key employment areas and non-designated employment sites) to determine the level of protection for each site typology. This will ensure a balanced approach to employment land protection.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4386	Chapter	7	Object						It is not clear why no consideration is given to the economic growth of the minerals sector or its downstream value.	Give consideration to the economic growth of the minerals sector and its downstream value.	Comment noted. The economic growth of the minerals sector and its downstream value is recognised, however it is not considered necessary to make reference to it in this chapter. The link between minerals extraction and economic growth has been recognised in the table of strategic priorities (M7) and (M8).	SP1, SP2, SS1, SP3, SS2, SS3, SP4, SS4, SP5, SS6, SP6, SS7, SP7, SP8, H1, H2, H3, H4, H5, H6, H7, SP11. ... SP1, SP2, SS1, SP3, SP4, SS5, SP5, SP6, EG1, EG2, EG3, EG4, EG5, EG6, SP11.
Spencer	Jefferies	National Grid	PD807	Policy	EG1	Support						Primary Employment Sites PEA4, PEA8, PEA10 are crosses by a national Grid High voltage electricity transmission overhead line. National Grid requests that building are not built directly beneath and seeks to encourage high quality and well planned development in the vicinity of its high voltage overhead lines. The statutory safety clearance between overhead line, the ground and built structures must not be infringed.	No modification proposed	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD150	Chapter	7	Support						Northumbrian Water support economic growth and encourage	No proposed modification	The Council acknowledges Northumbrian Waters support for the chapter.	The Council considers there have been no soundness or legal compliance issues

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											sustainable inward investment into the City. They have worked with Sunderland City Council and South Tyneside Council on the production and delivery of the IAMP AAP and will continue to do so as the site is brought forward.			raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3005	Policy	EG1	Object				The policy is considered not to place enough emphasis on the benefits of Mixed Use development. Employment space as part of housing-led or leisure-led developments can provide significant benefits over and above development based solely on employment use. This is a narrow approach taken by the policy and is an obstacle to sustainable development which is inconsistent with national policy and not justified. Particularly relevant to Rainton Bridge South.	The policy is considered not to place enough emphasis on the benefits of mixed use development. Employment space as part of housing-led or leisure-led developments can provide significant benefits over and above development based solely on employment use. This is a narrow approach taken by the policy and is an obstacle to sustainable development which is inconsistent with national policy and not justified. Particularly relevant to Rainton Bridge South.	Re-word the policy to include the potential for mixed-use development of which an element of residential should be considered.	In response to Siglion, primary employment areas (PEAs) are those existing employment areas which are considered essential to the long-term success of the city. These are located within the strongest demand areas and should be entirely protected from non-employment uses unless exceptional circumstances can be evidenced in order to ensure employment needs are met. The policy is flexible to enable land to come forward for alternative uses, where exceptional circumstances exist.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Chris	Dacre	Prestige Car Direct Properties Ltd	PD4592	Policy	EG1	Object		Wish for land at Ferryboat Lane to be included as part of the employment allocation for PEA1. The ELR identified the supply of employment land in Sunderland North as being particularly tight, which the extension to Site PEA1 would help to address. The site is considered to be appropriate for B1, B2 and B8 uses.	Wish for land at Ferryboat Lane to be included as part of the employment allocation for PEA1. The ELR identified the supply of employment land in Sunderland North as being particularly tight, which the extension to Site PEA1 would help to address. The site is considered to be appropriate for B1, B2 and B8 uses.	Wish for land at Ferryboat Lane to be included as part of the employment allocation for PEA1. The ELR identified the supply of employment land in Sunderland North as being particularly tight, which the extension to Site PEA1 would help to address. The site is considered to be appropriate for B1, B2 and B8 uses.	Wish for land at Ferryboat Lane to be included as part of the employment allocation for PEA1. The ELR identified the supply of employment land in Sunderland North as being particularly tight, which the extension to Site PEA1 would help to address. The site is considered to be appropriate for B1, B2 and B8 uses.	Amend the boundary for Site PEA1 to include land to the north.	In response to Prestige Car Direct Property Services, the Council has identified a sufficient stock of employment sites to meet identified employment need and thus there is no need to consider the expansion of designated employment sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Phil	Moorin	North East Property Partnerships	PD4509	Policy	EG2	Object		Concerned that Policy EG2 is too restrictive. The ELR indicates at oversupply of employment land in the Sunderland South subarea and recommends further de-allocations. Economic conditions and local circumstances have changed since the ELR was prepared. Pallion Industrial Estate will lose its anchor tenant in 2019, leaving a large void in the estate. Works have commenced on retail and leisure uses permitted at Pennywell. Concerned that criteria in Part 2 of policy are necessarily burdensome and that requiring two years marketing would not enable land agent to be fleet of foot. This should be limited to 6 months and should be able to be commenced ahead of a property becoming vacant.	Concerned that Policy EG2 is too restrictive. The ELR indicates at oversupply of employment land in the Sunderland South subarea and recommends further de-allocations. Economic conditions and local circumstances have changed since the ELR was prepared. Pallion Industrial Estate will lose its anchor tenant in 2019, leaving a large void in the estate. Works have commenced on retail and leisure uses permitted at Pennywell. Concerned that criteria in Part 2 of policy are necessarily burdensome and that requiring two years marketing would not enable land agent to be fleet of foot. This should be limited to 6 months and should be able to be commenced ahead of a property becoming vacant.	Concerned that Policy EG2 is too restrictive. The ELR indicates at oversupply of employment land in the Sunderland South subarea and recommends further de-allocations. Economic conditions and local circumstances have changed since the ELR was prepared. Pallion Industrial Estate will lose its anchor tenant in 2019, leaving a large void in the estate. Works have commenced on retail and leisure uses permitted at Pennywell. Concerned that criteria in Part 2 of policy are necessarily burdensome and that requiring two years marketing would not enable land agent to be fleet of foot. This should be limited to 6 months and should be able to be commenced ahead of a property becoming vacant.	Concerned that Policy EG2 is too restrictive. The ELR indicates at oversupply of employment land in the Sunderland South subarea and recommends further de-allocations. Economic conditions and local circumstances have changed since the ELR was prepared. Pallion Industrial Estate will lose its anchor tenant in 2019, leaving a large void in the estate. Works have commenced on retail and leisure uses permitted at Pennywell. Concerned that criteria in Part 2 of policy are necessarily burdensome and that requiring two years marketing would not enable land agent to be fleet of foot. This should be limited to 6 months and should be able to be commenced ahead of a property becoming vacant.	Amend the criteria in Part 2 of Policy EG2 to be more flexible. Wording suggested. Add additional criteria to Policy regarding Pennywell and Pallion which support their mixed use development through use of master plans.	The Council considers the overall quantum of available employment land to be particularly tight at the bottom end of the range of identified needs. It is therefore considered necessary for site highlighted to be retained as a key employment area. However, it should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use (B Use Classes). The criteria allowing this flexibility is set out at part 2, citations, i, ii, iii and iv. The Council feel that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future. On the issue of the need to recast part 2 citations i, ii, iii and iv, so that if one of the four citations are met non B use will be accepted. This is not considered acceptable, key employment areas are important to ensuring a sufficient supply of sites to support employment land needs (as identified in the Employment Land Review). Consequently, the use of land for non B use will need to satisfactorily meet all four citations set out in part 2 of policy EG2. This is considered proportionate and justified in the context of the tight supply of employment sites. Additionally, the Council deem a 24 month period for marketing to be reasonable terms. "24 months is considered appropriate as it is a sufficient time period to allow for variations in the business cycle. For example a 6 months marketing	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														period could be during a recessionary period which would not allow an appropriate economic context for a suitable occupier to come forward. A 24 month marketing timeframe would allow a much wider part of the business cycle to be observed and offer more opportunities for a suitable occupier to come forward. A longer time frame also makes sure that developer/ land owner incentives are aligned to utilising the space for its intended purpose, industrial occupation.	
John	Tumman	Sunderland Civic Society	PD824	Policy	EG2	Object			Considers the policy not to be effective as part 2 of the policy is non-specific as to which other uses may or may not be acceptable. Concerns over retail uses locating within employment areas and these not always being suitable locations. The policy is open-ended and could lead to key employment areas becoming prime focus for retail development and developers favouring sites within key employment areas. Concerns over a random distribution of retail within key employment areas leading to unsustainable transport patterns. Concerns over poor physical environment and hazardous road conditions within employment areas. Not opposed to certain forms of retail within key employment areas.				Suggested wording added to end of policy. Specialise retailing may be acceptable in key employment areas but general retail uses will not normally be acceptable unless exceptional circumstances, such as a pressing need in the locality. Will need to ensure access is available on foot, bicycle and public transport.	The policy has not been amended as this policy safeguards key employment areas for business and general industrial uses as it is considered that they are necessary to meet the identified need. Alternative uses would be assessed on their own merits and the Plan ensures this flexibility. Any retail development would be required to be in accordance with the sequential test.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4061	Policy	EG2	Object				Object to inclusion of the Hendon Paper Mill site within Site KEA1 of Policy EG2. There is no reasonable prospect of the site being used for employment use, so the policy is not consistent with the NPPF.	Object to inclusion of the Hendon Paper Mill site within Site KEA1 of Policy EG2. There is no reasonable prospect of the site being used for employment use, so the policy is not consistent with the NPPF.	Remove the former Hendon Paper Mill site from Site KEA1.	The Council considers the overall quantum of available employment land to be particularly tight at the bottom end of the range of identified needs. It is therefore considered necessary for site highlighted to be retained as a key employment area. However, it should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use (B Use Classes). The criteria allowing this flexibility is set out at part 2, citations, i, ii, iii and iv. The Council feel that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
		Cowie Properties LLP	PD240	Policy	EG2	Object			Object to the allocation of the Deptford site (KEA6) as a B use classes based upon the evidence presented in the Employment Land Review (2016) and ELR Post EU Referendum Forecasting Analysis (2017).	Object to the allocation of the Deptford site (KEA6) as a B use classes based upon the evidence presented in the Employment Land Review (2016) and ELR Post EU Referendum Forecasting Analysis (2017).	Object to the allocation of the Deptford site (KEA6) as a B use classes based upon the evidence presented in the Employment Land Review (2016) and ELR Post EU Referendum Forecasting Analysis (2017).	Land at Deptford should be removed from the list of sites allocated for B Class uses in Policy EG2. Proposed approach would be to allocate the site in the forthcoming Allocations and Designations Plan as a mixed-use site with potential for a range of uses including: A1-A5 retail, B1- B8 uses; Class C3 residential; Class C1 hotel; Class C2 residential institutions; Class D1 non-residential institutions; Class D2 leisure and sui generis car showroom use as all of these have already been established as acceptable.	The Council considers the overall quantum of available employment land to be particularly tight at the bottom end of the range of identified needs. It is therefore considered necessary for the site highlighted to be retained as a key employment area. However, it should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use (B Use Classes). The criteria allowing this flexibility is set out at part 2, citations, i, ii, iii and iv. The Council feel that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Paul	Mackings	Paul Mackings Consulting Ltd	PD2842	Policy	EG2	Object		Objects to inclusion of former Hendon Paper Mill site as a safeguarded employment site under Policy EG2. The site has significant remediation costs and requires a higher land use to be deliverable. The site previously had permission for residential development and developer is currently preparing an application for this use.		Objects to inclusion of former Hendon Paper Mill site as a safeguarded employment site under Policy EG2. The site has significant remediation costs and requires a higher land use to be deliverable. The site previously had permission for residential development. The site is in an area which the ELR identifies as having an oversupply of employment land. The site is sustainable and appropriate for residential development and developer is currently preparing an application for this use.		Objects to inclusion of former Hendon Paper Mill site as a safeguarded employment site under Policy EG2. The site has significant remediation costs and requires a higher land use to be deliverable. The site previously had permission for residential development. The site is in an area which the ELR identifies as having an oversupply of employment land. The site is sustainable and appropriate for residential development and developer is currently preparing an application for this use.	Remove the Hendon Paper Mill site from KEA1 and designate it as 'white land'.	The Council considers the overall quantum of available employment land to be particularly tight at the bottom end of the range of identified needs. It is therefore considered necessary for site highlighted to be retained as a key employment area. However, it should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use (B Use Classes). The criteria allowing this flexibility is set out at part 2, citations, i, ii, iii and iv. The Council feel that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3020	Policy	EG2	Object					There is an excess of employment areas in Sunderland. Modern working methods are likely to reduce demand. These areas would be better for housing, without using green field or Green Belt.	No modifications proposed.	The Council has prepared an Employment Land Review; this identified a need for some 95 to 115 hectares of employment over the plan period. Consequently, there is a need to retain employment land over the plan period. Policy EG2, attempts to seek a balance between ensuring supply to meet need and allow for the flexibility to non B uses when criteria stipulated in the policy are met.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Katie	Sully	Siglion	PD2886	Policy	EG2	Object		Town End Farm and Hetton Lyons South have been omitted from list of areas to be safeguarded (for B1, B2 and B8 employment uses) and as such the policy is not justified or effective. There are benefits keeping EG2 for economic regeneration, but there should be flexibility so that mixed use with residential is also appropriate, and with more use classes made available.			Town End Farm and Hetton Lyons South have been omitted from list of areas to be safeguarded (for B1, B2 and B8 employment uses) and as such the policy is not justified or effective. There are benefits keeping EG2 for economic regeneration, but there should be flexibility so that mixed use with residential is also appropriate, and with more use classes made available.	Include Town End Farm and Hetton Lyons South within Policy EG2. Increase flexibility within policy to enable housing-led mixed-use regeneration, together with additional use classes available.	In response to Siglion, although the supply of employment land is particularly tight, the Council has identified a sufficient stock of employment sites to meet identified employment need and thus there is no need to consider designating sites at Town End Farm or Hetton Lyons South.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Michael	Harney		PD4223	Policy	EG2	Object					Would like to see Emily's Nursery site removed from employment allocation KEA2 of Policy EG2. The property has been marketed for in excess of 2 years with no interest. Would like to bring the site forward for residential development alongside adjacent site, with land swap for cemetery provision.	Remove Emily's Nursery from employment allocation.	The Council considers the overall quantum of available employment land to be particularly tight at the bottom end of the range of identified needs. It is therefore considered necessary for site highlighted to be retained as a key employment area. However, it should be noted that the policy gives sufficient flexibility to allow for non B use where if it can be demonstrated that there is no reasonable prospect of the site being brought forward for employment use (B Use Classes). The criteria allowing this flexibility is set out at part 2, citations i, ii, iii and iv. The Council feel that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3021	Policy	EG5	Object					There is no evidence of commercial need for offices. Better to use space for mixed use residential close to transport hubs.	Use space for mixed use residential close to transport hubs.	The Employment Land Review (2016) outlined a need to plan for 15 ha of land for office based development over the plan period (para 7.102 pg 87). Consequently, there is a justified need for policy EG5.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
M&G Real Estate			PD3606	Policy	VC1	Object		Generally support the policy, but feel it should be more robust, particularly in the interim period until the A&D Plan is prepared. Concerned that the Council has		Generally support the policy, but feel it should be more robust, particularly in the interim period until the A&D Plan is prepared. Concerned that the Council has	Generally support the policy, but feel it should be more robust, particularly in the interim period until the A&D Plan is prepared. Concerned that the Council has	The Policy should be amended to introduce a phasing element to which out of centre locations are equally subject. Delete Part 7 of the Policy.	The Council considers this Policy clear in the proposed hierarchy of centres and therefore which are the sequentially preferred locations for main town centre uses. Only if it can be sequentially demonstrated that there are no suitable sites available within any designated centre will	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no	

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								overestimated retail need and does not consider there to be any available sites in Washington Town Centre, so Policy would allow out of centre development. Suggest Paragraph 2 is amended to say major instead of principal. Concern that point 7 of the Policy encourages out-of-centre development.	overestimated retail need and does not consider there to be any available sites in Washington Town Centre, so Policy would allow out of centre development. Suggest Paragraph 2 is amended to say major instead of principal. Concern that point 7 of the Policy encourages out-of-centre development.		overestimated retail need and does not consider there to be any available sites in Washington Town Centre, so Policy would allow out of centre development. Suggest Paragraph 2 is amended to say major instead of principal. Concern that point 7 of the Policy encourages out-of-centre development.	overestimated retail need and does not consider there to be any available sites in Washington Town Centre, so Policy would allow out of centre development. Suggest Paragraph 2 is amended to say major instead of principal. Concern that point 7 of the Policy encourages out-of-centre development.		retail parks will be preferred over other out-of-centre sites. The Policy is not considered to encourage out-of-centre development. This is justified in more detail in Compliance Statement Policy VC1. The Council considers this policy to be sound.	modifications are proposed.
		Urban and Civic	PD838	Policy	VC1	Support						Support the definition of Houghton-le-Spring as a Town Centre, reflecting its role in meeting needs across the Coalfield area. Support the identified boundary which includes the former Houghton Colliery site which would act as a suitable edge of centre location for retail and support the town centre.	No modifications proposed.	The suggested site would be a sequentially preferred location for main town centre uses as is within the identified Town Centre boundary. The Sunderland Retail Needs Assessment (2016: p111) identifies no quantitative need for any additional convenience retail floorspace within the city over the period to 2035, but acknowledges there remains a qualitative need for a further supermarket – at least medium in size – within the Coalfield sub-area, so as to reduce unnecessary levels of car travel. A suitable site will be allocated to meet this need through the Allocations and Designations Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
M&G Real Estate			PD3609	Policy	SP9	Support with mods		Concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. The Policy offers no protection to Washington Town Centre prior to the adoption of the A&D Plan. The Policy should make clear that development should be directed to designated centres, delivery phased and impose stronger restrictions on out of centre development.	Concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. The Policy offers no protection to Washington Town Centre prior to the adoption of the A&D Plan. The Policy should make clear that development should be directed to designated centres, delivery phased and impose stronger restrictions on out of centre development.		Concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. The Policy offers no protection to Washington Town Centre prior to the adoption of the A&D Plan. The Policy should make clear that development should be directed to designated centres, delivery phased and impose stronger restrictions on out of centre development.	Concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. The Policy offers no protection to Washington Town Centre prior to the adoption of the A&D Plan. The Policy should make clear that development should be directed to designated centres, delivery phased and impose stronger restrictions on out of centre development.	A phasing policy should be introduced.	Comment noted. Policy VC1 requires proposals for main town centre uses to follow the sequential assessment approach, therefore adequate protection will be afforded to designated centres prior to the provision of retail allocations through the A&D Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
M&G Real Estate			PD3612	Policy	VC2	Object		Concerned that the approach does not take account the potential cumulative impacts of development. Suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.	Concerned that the approach does not take account the potential cumulative impacts of development. Suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.		Concerned that the approach does not take account the potential cumulative impacts of development. Suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.	Concerned that the approach does not take account the potential cumulative impacts of development. Suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.	Revise impact thresholds and introduce phasing.	Sunderland City Centre is a large sub-regional centre, which is well positioned to withstand significant adverse impacts from out-of-centre retail developments. It is therefore proposed that the NPPF default threshold will continue to apply for comparison retail developments which are likely to affect the city centre. However, as the city centre does not have any large convenience retailers at present, it is considered that the City Centre is more susceptible to significant adverse impacts from out-of-centre convenience retail developments. Therefore, the slightly lower threshold of 2,000 sqm has been set for convenience retail. With regard to the other centres within the city, these are generally smaller in scale and have a much more localised catchment. It is therefore proposed to set a lower threshold for when a retail impact assessment is required for proposals likely to affect the vitality and viability of Town, District and Local Centres. The thresholds chosen are consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) and are set out in more detail in Compliance Statement Policy VC2. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Urban and Civic	PD872	Policy	SP9	Object		Strategic Policies SP1 and SP9 (and paragraph 4.18) only deal with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for				Strategic Policies SP1 and SP9 (and paragraph 4.18) only deal with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for	Quantitative capacity has been identified to support up to 45,400 sqm gross new comparison goods retail floorspace in Sunderland over the period to 2035, after allowing for existing commitments. The	The Sunderland Retail Needs Assessment (2016) acknowledges the qualitative need for a further supermarket “at least medium in size” within the Coalfield sub-area, so as to reduce unnecessary levels of car travel. A suitable site will be allocated to meet this need through the Allocations and Designations Plan. Allocations are not being made through the CSDP.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								either convenience or comparison retailing and that the Retail Needs Study identifies a need to enhance the existing range of convenience and comparison retailing in the Coalfield area, including in Houghton-le-Spring. SP9 (rather than paragraph 8.11) should also make clear that the Houghton Colliery site will be the preferred location for new retail development in Houghton-le-Spring.				either convenience or comparison retailing and that the Retail Needs Study identifies a need to enhance the existing range of convenience and comparison retailing in the Coalfield area, including in Houghton-le-Spring. SP9 (rather than paragraph 8.11) should also make clear that the Houghton Colliery site will be the preferred location for new retail development in Houghton-le-Spring.	quantitative need for new floorspace will be reviewed regularly by the Council over the plan period. The Council will prioritise the development of new retail and other town centre uses which resolve existing qualitative deficiencies in provision. This will include a new medium to large sized supermarket and enhanced comparison goods retail provision in the Coalfields Area, which should come forward on the former Houghton Colliery site."			
Katie	Sully	Siglion	PD3120	Policy	VC3	Object			Consultee puts forward that 15% A1 rule should be more flexible and there should be more flexibility for marketing of A1 use for 24 months.			Consultee puts forward that 15% A1 rule should be more flexible and there should be more flexibility for marketing of A1 use for 24 months.	Policy should be more proactive, reducing the marketing period to 12 months and consider Primary and Secondary frontages as integral to shopping and other essential town centre uses.	The Sunderland Retail Needs Assessment (2016) suggests a policy mechanism for controlling the amount of non-A1 development within Primary Frontages. A marketing period of 6-24 months is suggested and the higher end of this range has been taken forward because part 4 of the policy already offers a degree of flexibility for non-A1 development within Primary Frontages. It is considered that a shorter marketing period will not provide sufficient opportunity for A1 development to come forward and that 24 months provides an appropriate balance to ensure long term vacancies are avoided and the prominence of A1 uses is retained within Primary Frontages. Policy VC3.4 resists proposals for non-A1 use within areas of Primary Frontage where they cannot demonstrate that they have satisfied the above marketing period and they would result in: more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre; more than 25% of each Primary Frontage thoroughfare in Washington Town Centre; or more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use. This Policy is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) and is outlined in more detail in Compliance Statement Policy VC3. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Barbara	Hooper	Historic England	PD101	Policy	VC3	Support						Historic England support the diverse range of uses proposed for the area proposed as Secondary Frontages.	No modification proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
M&G Real Estate			PD3615	Policy	VC3	Object		The evidence base stresses the health of Washington Town Centre, but this has only been possible through the lettings policy and remodelling by the owners. Traditional shopping frontage policy is not appropriate for Washington Town Centre, in particular requirement to market a property for 24 months. A subsidiary policy should be provided for Washington, which may provide guidelines for the proportion of each frontage in non A1 use.	The evidence base stresses the health of Washington Town Centre, but this has only been possible through the lettings policy and remodelling by the owners. Traditional shopping frontage policy is not appropriate for Washington Town Centre, in particular requirement to market a property for 24 months. A subsidiary policy should be provided for Washington, which may provide guidelines for the proportion of each frontage in non A1 use.			The evidence base stresses the health of Washington Town Centre, but this has only been possible through the lettings policy and remodelling by the owners. Traditional shopping frontage policy is not appropriate for Washington Town Centre, in particular requirement to market a property for 24 months. A subsidiary policy should be provided for Washington, which may provide guidelines for the proportion of each frontage in non A1 use.	The evidence base stresses the health of Washington Town Centre, but this has only been possible through the lettings policy and remodelling by the owners. Traditional shopping frontage policy is not appropriate for Washington Town Centre, in particular requirement to market a property for 24 months. A subsidiary policy should be provided for Washington, which may provide guidelines for the proportion of each frontage in non A1 use.	Do not apply the common approach on the need for marketing and vacancy periods to Washington but rather agree simple thresholds to ensure that the broad character is retained.	The Sunderland Retail Needs Assessment (2016) suggests a policy mechanism for controlling the amount of non-A1 development within Primary Frontages. A marketing period of 6-24 months is suggested and the higher end of this range has been taken forward because part 4 of the policy already offers a degree of flexibility for non-A1 development within Primary Frontages. It is considered that a shorter marketing period will not provide sufficient opportunity for A1 development to come forward and that 24 months provides an appropriate balance to ensure long term vacancies are avoided and the prominence of A1 uses is retained within Primary Frontages. Policy VC3.4 resists proposals for non-A1 use within areas of Primary Frontage where they cannot demonstrate that they have satisfied the above marketing period and they would result in: more than 15% of each	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													Primary Frontage thoroughfare in Sunderland City Centre; more than 25% of each Primary Frontage thoroughfare in Washington Town Centre; or more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use. This Policy is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) and is outlined in more detail in Compliance Statement Policy VC3. The Council considers this policy to be sound.	
		Urban and Civic	PD937	Policy	VC4	Object		As currently drafted, Part 2 of Policy VC4 could prevent Class A5 uses being brought forward on this site, based on a review of current levels of obesity in the wards surrounding the site. Class A5 uses (in the consultee's opinion) are widely regarded as "main Town Centre uses" and this could have a detrimental impact to the proposal at Houghton Colliery. A less prescriptive policy is needed.			As currently drafted, Part 2 of Policy VC4 could prevent Class A5 uses being brought forward on this site, based on a review of current levels of obesity in the wards surrounding the site. Class A5 uses (in the consultee's opinion) are widely regarded as "main Town Centre uses" and this could have a detrimental impact to the proposal at Houghton Colliery. A less prescriptive policy is needed.	Part 2 Policy VC4 should be amended as follows: "To promote healthier communities, the Council will only approved proposals for hot food takeaways within Class A5 where it can be demonstrated that they will not have a significant adverse impact upon: - the vitality and viability of existing centres; - local amenity, including in terms of noise, odours and anti-social behaviour; and - levels of obesity within the ward within which they would be situated. Unless it can be demonstrated that proposals would have a significant adverse impact in respect of any of the above criteria, then such uses will not be prevented from coming forward on sites specifically identified or allocated for main town centres uses..	Comment noted. The policy only seeks to restrict the provision of new takeaways in the areas with the highest childhood obesity rates. This is consistent with the PPG, which allows local authorities to control the numbers of takeaways on health grounds, where robust evidence is provided. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Kentucky Fried Chicken (Great Britain) Limited	PD256	Policy	VC4	Object	Object to Policy VC4 on the grounds that it has not been positively prepared as it is not based on an objectively assessed requirement. No assessment of the social, environmental and economic impacts has been undertaken, so it is not possible to balance these impacts. The policy makes negative assumptions about the food served in isolation from the person eating it and assumes that all hot food is unhealthy.	Object to Policy VC4 on the grounds that it is not effective as diet is only one of the contributory factors to obesity levels, access to open space, sport and recreation activities is also important. Primary school children are generally not permitted to leave the premises at lunch and would be accompanied to school. Not all hot food takeaways serve unhealthy food. It is not clear how the policy would be monitored.	Object to Policy VC4 on the grounds that it is not compliant with the duty to cooperate.	The Policy has not had regard to the NPPF, which includes no guidance on dietary issues. The NPPF seeks to enable people to live healthier lives through access to open space, sport recreation and health care facilities and not restrict choice.	Objects to Policy VC4 on the grounds that it is not justified as there is no objective evidence for a causal link between the incidence of obesity and the proximity of hot food takeaways to schools. The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and are unlikely to travel to school unaccompanied. A distance calculation is not justified as it takes not consideration of physical barriers. May support restrictions in Part 1 of Policy VC4, but there needs to be an evidenced percentage level for all areas.	Delete VC4 (1) (i), replace all references to 24 months with 12 months and amend Table 1 based on evidence of a healthy use balance, including a percentage (even if below current levels) for primary frontages. Delete VC4 (2) (i) and delete VC4 (2) (ii) or provide evidence for the specific percentages used rather than any other level of obesity.	The Council considers that the policy is justified, effective, positively prepared and consistent with national policy. The Policy is based on robust evidence contained within the Retail Needs Assessment, the public health evidence in relation to the use of the planning system to control hot food takeaways report and the Compliance Statement. The period of vacancy is consistent with the recommendations of the Retail Needs Assessment. Whilst it is acknowledged that the period of vacancy is at the top end of the range recommended by the study, this is in recognition that there are already high numbers of hot food takeaways present within some of our designated centres. The policy seeks to strike the right balance between ensuring that the vitality and viability of designated centres is protected, whilst also safeguarding against long term vacancies. The thresholds in Table 1 are consistent with the recommendations of the Retail Needs Assessment. The plan seeks to protect the predominance of retail uses in the primary frontages of Sunderland City Centre. It is considered that permitting further hot food takeaways in the primary frontages would adversely impact upon vitality and viability of this prime retail area. The PPG allows local planning authorities to control uses such as hot food takeaways on health grounds, where there is robust evidence to do so. Public Health evidence in relation to the use of the planning system to control hot food takeaways report sets out the robust evidence for this policy. Further justification is provided in the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mike	Anderson	Planware Ltd	PD1147	Policy	VC4	Object		Objects to Policy VC4 on the grounds that	Objects to Policy VC4 on the grounds that	Objects to Policy VC4 on the grounds that	Objects to Policy VC4 on the grounds that	No modifications proposed.	The Council considers that the policy is justified, effective, positively	The Council considers there have been no

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								the Policy has not been positively prepared. The NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences.	the Policy is not effective. The NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences.		it is not consistent with National Policy. The NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences. The Policy is inconsistent with Paragraphs 19 and 21 of the NPPF.	the Policy is not justified. The NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences.		prepared and consistent with national policy. The Policy is based on robust evidence contained within the Retail Needs Assessment, the public health evidence in relation to the use of the planning system to control hot food takeaways report and the Compliance Statement.	soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD2849	Policy	VC4	Object			The requirements for retail units to be marketed for 24 months before A5 use can be sought does not contribute to the vitality of Sunderland or the provision of active uses.			The requirements for retail units to be marketed for 24 months before A5 use can be sought does not contribute to the vitality of Sunderland or the provision of active uses.	The policy should be more proactive, reducing the marketing period to 12 months before A5 uses can be sought.	Comment noted. The policy is consistent with the recommendations of the Sunderland Retail Needs Assessment. Whilst it is acknowledged that the period of vacancy is at the top end of the range recommended by the study, this is in recognition that there are already high numbers of hot food takeaways present within some of our designated centres. The policy seeks to strike the right balance between ensuring that the vitality and viability of designated centres is protected, whilst also safeguarding against long term vacancies. Further justification is provided in the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Kentucky Fried Chicken (Great Britain) Limited	PD259	Table	1	Object		The percentages for Primary Frontages imply that no hot food takeaways are required and does not account for situations in which existing hot food takeaways change to other uses.				There is no objective evidence for the thresholds cited, certainly in terms of public health. Some assessment of what levels might be harmful is required in order to set these.	Amend Table 1 based on evidence of a healthy use balance, including a percentage (even if below current levels) for primary frontages. Provide clarity on what percentages are ideal in retail health terms and which are ideal in public health terms.	Comment noted. The percentages used are consistent with the recommendations of the Retail Needs Assessment. Further justification is set out within the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3103	Policy	VC6	Object			Consultee is supportive of the policy but it is considered that policy changes and additional supporting text regarding modern leisure should be included as the policy in current form is not effective or justified.			Consultee is supportive of the policy but it is considered that policy changes and additional supporting text regarding modern leisure should be included as the policy in current form is not effective or justified.	The policy wording should reflect the changing nature of leisure which has become more innovative and engaging.	The Council considers this policy to be sound as it supports cultural, leisure and tourism industries generally, including modern forms of leisure. No modifications are considered necessary. Further justification for this Policy is set out in Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD102	Policy	VC6	Support						Historic England support the encouragement of temporary and meanwhile uses for vacant buildings, as noted in (vii).	No modifications proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD72	Policy	VC5	Object		Support the policy as drafted and in particular the reference to 'delivery'. However, object on the grounds that an additional criterion be added requiring development to contribute to the delivery of healthcare infrastructure amongst other infrastructure to mitigate the impact of a relevant local development. In addition, objection to the relationship between this policy and the Planning Obligations SPD as health infrastructure	Support the policy as drafted and in particular the reference to 'delivery'. However, object on the grounds that an additional criterion be added requiring development to contribute to the delivery of healthcare infrastructure amongst other infrastructure to mitigate the impact of a relevant local development. In addition, objection to the relationship between this policy and the Planning Obligations SPD as health infrastructure			Support the policy as drafted and in particular the reference to 'delivery'. However, object on the grounds that an additional criterion be added requiring development to contribute to the delivery of healthcare infrastructure amongst other infrastructure to mitigate the impact of a relevant local development. In addition, objection to the relationship between this policy and the Planning Obligations SPD as health infrastructure	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, ecology, sport and recreation, highways and public transport.	The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which is based around contributions towards: affordable housing, education, children's equipped play space, ecology, open space, highways and public transport, sports and recreation, and other site	8.32 - Community facilities and local services (as defined in the glossary) provide opportunities for residents to meet and share their interests and access essential services such as education, health care (SP7) and family support. It is therefore important that these facilities are protected where possible. <u>Local Services</u> <u>A facility that provides a valuable local service to the community such as a small convenience store, post office or public house.</u>

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								falls within as 'other site specific requirements' and warrants its own specific section 'health infrastructure'.	falls within as 'other site specific requirements' and warrants its own specific section 'health infrastructure'.			falls within as 'other site specific requirements' and warrants its own specific section 'health infrastructure'.		specific requirements such as art, heritage, and health facilities. The Council has opted not to reference to any specific type of community facility within Policy VC5. Paragraph 8.32 of the CSDP (2018: p75) includes examples of community facilities such as education, health care and family support. The term "community facilities" is also included in the CSDP glossary. The description references health care, childcare, cultural and social services. It is not considered necessary or appropriate to reference any of these services in the policy itself. Contributions will be sought where necessary, justified, and relevant to a development. The policy as existing is sufficient to protect, enhance, and deliver community facilities and local services. Further justification for this Policy can be found in Compliance Statement Policy VC5. The Council has agreed a Statement of Common Ground with NHS Sunderland CCG (SD.8k). However, the Council have proposed an additional modification to paragraph 8.32 and the glossary to include a definition for local services (M44, M91).	
Tom	Clarke	Theatres Trust	PD225	Policy	VC6	Support						Theatre Trusts supports part 1 of the policy.	No modifications proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Tom	Clarke	Theatres Trust	PD223	Policy	VC5	Support						Theatres Trust supports they policy, which should provide protection for Sunderland's valued social, community and cultural facilities, and welcome that the definition includes cultural facilities, such as theatres, giving compatibility and consistency with the NPPF.	No modifications proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Rob	Cutler	Washington AFC	PD233	Paragraph	8.42	Support with mods		Support the paragraph, the Plan and the inclusion of the three football hubs in Sunderland area. However, to support the growth of the Club and the future needs of the Football league in Washington a spectator stand is required at Northern Playing fields. The land identified is currently in the Green Belt and therefore development of a stand would be against national policy. The stand would also enable other spectator sports to be held at the venue.					Remove land at Northern Playing fields to accommodate a spectator stand.	It is considered too late to make amendments to the established Green Belt at this point in the plan-making process. In the Council's most recent Green Belt Review, this site was not considered suitable as a Green Belt deletion site for any purpose. In any event, the reasons put forward by Washington AFC are not considered to meet the exceptional circumstances required to amend the Green Belt boundary. If the consultee wishes to pursue the proposed development of a spectator stand and associated facilities, it is recommended that this is sought through the traditional planning application process. Further justification for this policy can be found in Compliance Statement Policy VC6. The Council considers the Plan to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARBON HOMES			PD3388	Policy	BH1	Object						Concerned regarding the requirement for all dwellings to be built to Nationally Described Space Standards (NDSS) as this has not been justified by evidence. The evidence base is inconsistent, as the whole plan viability assessment indicates that the majority of new homes comply, but the Internal Space Standards paper suggests they don't. The Council have not tested the	Further consider the impact of the NDSS requirement and the impact on affordability.	This Policy is not considered to threaten the viability or deliverability of housebuilding and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												impact of NDSS on viability, particularly for affordable housing.		variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. The Council considers this Policy to be sound.	
Amy F	Ward	Barratt David Wilson Homes	PD1623	Policy	BH1	Object		Concerned that Policy BH1 seeks to implement national space standards without the requisite justification and evidence. PPG requires the Council to evidence need, viability and timing. Concerned that Policy will reduce consumer choice by now allowing entry level 2, 3 and 4 bed properties which may not meet the standard. Larger houses will require more land take and may not allow authority to meet housing requirement.	Concerned that Policy BH1 seeks to implement national space standards without the requisite justification and evidence. PPG requires the Council to evidence need, viability and timing. Concerned that Policy will reduce consumer choice by now allowing entry level 2, 3 and 4 bed properties which may not meet the standard. Larger houses will require more land take and may not allow authority to meet housing requirement.		Concerned that Policy BH1 seeks to implement national space standards without the requisite justification and evidence. PPG requires the Council to evidence need, viability and timing. Concerned that Policy will reduce consumer choice by now allowing entry level 2, 3 and 4 bed properties which may not meet the standard. Larger houses will require more land take and may not allow authority to meet housing requirement.	Concerned that Policy BH1 seeks to implement national space standards without the requisite justification and evidence. PPG requires the Council to evidence need, viability and timing. Concerned that Policy will reduce consumer choice by now allowing entry level 2, 3 and 4 bed properties which may not meet the standard. Larger houses will require more land take and may not allow authority to meet housing requirement.	Remove the element of the Policy referring to national space standards.	This Policy is not considered to threaten the viability or deliverability of house building and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5048	Policy	BH1	Object		Consider that Site HGA1 conflicts with Point 10 of Policy BH1 due to the impacts on Hauler House and railway line of Bowes Railway, which is a Scheduled Ancient Monument.	Consider that Site HGA1 conflicts with Point 10 of Policy BH1 due to the impacts on Hauler House and railway line of Bowes Railway, which is a Scheduled Ancient Monument.		Consider that Site HGA1 conflicts with Point 10 of Policy BH1 due to the impacts on Hauler House and railway line of Bowes Railway, which is a Scheduled Ancient Monument.	Consider that Site HGA1 conflicts with Point 10 of Policy BH1 due to the impacts on Hauler House and railway line of Bowes Railway, which is a Scheduled Ancient Monument.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The Council considers each Housing Growth Area (HGA) site to adhere to the guidance outlined in this policy. In relation to BH1.10, HGA sites in close proximity to important buildings, structures or landscape features reference this as a site constraint/parameter. For example, HGA1 South West Springwell states that development should "ensure that the open aspect to Bowes Railway Scheduled Ancient Monument (SAM) is retained". More justification is set out in Compliance Statement Policy BH1. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD5056	Policy	BH1	Object					General support for policy, but parts are considered to be overly restrictive, including BH1(8), (10) and (13) and that (10) does not take into account that mitigation could be used to minimise any significant adverse impacts in accordance with NPPF. Considered that there is insufficient evidence provided to justify requirement for national space standards and is contrary to NPPF. Paragraph 9.5 should state that design codes for large scale developments should not be mandatory requirements.		Part 8 should include insertion "where appropriate and viable". Part 10 include "where possible", Part 13 include "encourage". Delete part 14 on spacing standards.	The NPPF (2012) attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. In plan-making, Local Authorities are encouraged to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Planning policies should aim to ensure that development functions well and adds to the quality of the area; establishes a strong sense of place; responds to local character and history; creates safe and accessible environments; and is visually attractive as a result of good architecture. Policy BH1 aims to deliver this through a collection of guidelines for quality development. It encourages development to maximise opportunities for sustainable mixed-use schemes; create places with a clear function; maximise natural surveillance and active frontages; retain privacy; and create safe, convenient, and visually attractive areas. Policy BH1 encourages development to provide appropriate landscaping as an integral part of the development, including the enhancement and upgrading of public realm and existing green infrastructure, retaining landscape features and reflecting surrounding landscape character. This subsection of the policy aims to achieve good design and sustainable development, in line with the requirements of the NPPF. The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive. The policy continues; "large scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes". If	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														It can be demonstrated as part of the application process that the policy requirements are not appropriate or viable, a proposal may still be acceptable on balance when determined on its merits. Design codes are not mandatory requirements and are only required where appropriate. The supporting text clarifies that the need for design codes will be established at the pre-application stage. As of October 2015, Local Authorities have had the option to apply NDSS as a minimum and it is recognised that these standards exceed what is required by building regulations. The caveat for adopting the new technical standards is that a clearly evidenced need must be demonstrated. The Council has demonstrated this need in the Internal Space Standards Report (2018) and does not consider this point to affect the soundness of this policy. Outlined in the Council's Whole Plan Viability Assessment (2017) is the evidential basis that this will not impact upon the viability and deliverability of individual sites or on the overall plan. The Council considers this Policy to be sound. Further justification for this Policy is set out in Compliance Statement Policy BH1.	
Taylor Wimpey		Taylor Wimpey	PD3742	Policy	BH1	Object					General support for policy, but parts are considered to be overly restrictive, including BH1(8), (10) and (13). Considered that there is insufficient evidence provided to justify requirement for national space standards (BH1:14, and Paragraph 9.4) and is contrary to NPPF. Revisions are required to provide policy flexibility for proposals to be considered on a site-by-site basis.		Part 8 should include insertion "where appropriate and viable". Part 10 include "where possible", Part 13 include "encourage". Delete part 14 on spacing standards. Delete paragraph 9.4.	<p>The NPPF (2012) attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive.</p> <p>A lack of space in a home can compromise basic lifestyle needs such as spaces to store possessions, play, exercise and entertain. It can also have a profound effect on health, educational attainment, family relationships and even social cohesion. The size and quality of new homes is therefore an important influence on the health and wellbeing of the city's residents. The vast majority of the plan area's new housing fails to meet the recommended minimum space standards. It is therefore considered that this research demonstrates the need for minimum space standards in Policy BH1.14.</p> <p>The Council considers this Policy to be sound. Further justification for this Policy is set out in Compliance Statement Policy BH1.</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dominic	Smith	Esh Developments Ltd	PD1933	Policy	BH1	Object					General support for policy, but parts are considered to be overly restrictive, including BH1(8). Considered that there is insufficient evidence provided to justify requirement for national space standards and is contrary to NPPF. Paragraph 9.5 should state that design codes for large scale developments should not be mandatory requirements.		Part 8 should include insertion "where appropriate and viable". Part 10 include "where possible", Part 13 include "encourage". Delete part 14 on spacing standards. Delete paragraph 9.4 and add text to paragraph 9.5 to include "where appropriate" and consider preparation of design frameworks for development e.g. over 300 dwellings.	<p>Policy BH1 encourages development to provide appropriate landscaping as an integral part of the development, including the enhancement and upgrading of public realm and existing green infrastructure, retaining landscape features and reflecting surrounding landscape character. This subsection of the policy aims to achieve good design and sustainable development, in line with the requirements of the NPPF. The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive. The policy continues; "large scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes". If it can be demonstrated as part of the application process that the policy requirements are not appropriate or viable, a proposal may still be acceptable on balance when determined on its merits. Design codes are not mandatory requirements and are only required where appropriate. The supporting text clarifies that the need for design codes will be established at the pre-application stage. The Council considers this Policy to be sound. Further justification for this Policy</p>	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Taylor Wimpey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2517	Policy	BH1	Object					Generally support the policy, but consider it to be inflexible and onerous in places such as parts 8, 10 and 13. Consider that the requirement to build to national space standards has not been evidenced. Clarity is needed on when design codes would be required.	Generally support the policy, but consider it to be inflexible and onerous in places such as parts 8, 10 and 13. Consider that the requirement to build to national space standards has not been evidenced. Clarity is needed on when design codes would be required.	Amend point 8 to add where appropriate and viable. Amend point 10 to avoid, where possible, disruption to established views and allow for appropriate mitigation or compensation. Amend point 13 to encourage rather than maximise. Remove point 14. Remove paragraph 9.4. Amend Paragraph 9.5 to include threshold of over 300 dwellings for example and indicate that design codes should be prepared where appropriate.	and supporting text is set out in Compliance Statement Policy BH1. The NPPF (2012) attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. In plan-making, Local Authorities are encouraged to develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Planning policies should aim to ensure that development functions well and adds to the quality of the area; establishes a strong sense of place; responds to local character and history; creates safe and accessible environments; and is visually attractive as a result of good architecture. Policy BH1 aims to deliver this through a collection of guidelines for quality development. It encourages development to maximise opportunities for sustainable mixed-use schemes; create places with a clear function; maximise natural surveillance and active frontages; retain privacy; and create safe, convenient, and visually attractive areas. Policy BH1 encourages development to provide appropriate landscaping as an integral part of the development, including the enhancement and upgrading of public realm and existing green infrastructure, retaining landscape features and reflecting surrounding landscape character. This subsection of the policy aims to achieve good design and sustainable development, in line with the requirements of the NPPF. The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive. The policy continues; "large scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes". If it can be demonstrated as part of the application process that the policy requirements are not appropriate or viable, a proposal may still be acceptable on balance when determined on its merits. Design codes are not mandatory requirements and are only required where appropriate. The supporting text clarifies that the need for design codes will be established at the pre-application stage. As of October 2015, Local Authorities have had the option to apply NDSS as a minimum and it is recognised that these standards exceed what is required by building regulations. The caveat for adopting the new technical standards is that a clearly evidenced need must be demonstrated. The Council has demonstrated this need in the Internal Space Standards Report (2018) and does not consider this point to affect the soundness of this policy. Outlined in the Council's Whole Plan Viability Assessment (2017) is the evidential basis that this will not impact upon the viability and deliverability of individual sites or on the overall plan. The Council considers this Policy to be sound. Further justification for this Policy is set out in Compliance Statement Policy BH1.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD103	Policy	BH1	Support with mods					Historic England supports this very approach to high quality design. In part (11) it is important to recognise that there may be cumulative impacts from tall building.	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".	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. An addition modification is proposed within paragraph 9.2 to reflect this as part of a Statement of Common Ground (SD.8k) between the Council and Historic England (M45).	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.	
Adam	McVicke	Persimmo	PD407	Policy	BH1	Object					Object to the	Remove the	This Policy is not considered to	The Council considers	

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	rs	n Homes (Durham)	9									requirement for all homes to be built to the national space standard as there is insufficient evidence and justification for the requirement.	requirement for development to meet national space standards from Policy BH1.	threaten the viability or deliverability of housebuilding and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. The Council considers this Policy to be sound.	there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1948	Policy	BH1	Object		Objects to Policy BH1 on the grounds that there is no evidence to justify the introduction of national space standards and the requirement would affect site viability.			Objects to Policy BH1 on the grounds that there is no evidence to justify the introduction of national space standards and the requirement would affect site viability.	Objects to Policy BH1 on the grounds that there is no evidence to justify the introduction of national space standards and the requirement would affect site viability.	Part 14 of Policy BH1 should be deleted.	This Policy is not considered to threaten the viability or deliverability of house building and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. For clarity, the Council has proposed a minor addition to the supporting text in paragraph 9.4 to set out the period of transition in adopting the standards (M46).	New residential development needs to ensure that homes are built with enough indoor and outdoor space to meet the needs of the intended residents. This will be achieved through new housing meeting nationally described space standards as a minimum. <u>To allow for a period of transition, these standards will be introduced one year from the date of adoption of this plan.</u>
Avant Homes			PD1519	Policy	BH1	Object		Objects to proposed Policy BH1 criteria 14: meet national spaces standards as a minimum. This criteria places an undue burden on developers and could prevent an appropriate mix of residential sites from coming forward within the Plan period. The criteria should be removed as it is not effective and is not required in national planning policy.	Objects to proposed Policy BH1 criteria 14: meet national spaces standards as a minimum. This criteria places an undue burden on developers and could prevent an appropriate mix of residential sites from coming forward within the Plan period. The criteria should be removed as it is not effective and is not required in national planning policy.		Objects to proposed Policy BH1 criteria 14: meet national spaces standards as a minimum. This criteria places an undue burden on developers and could prevent an appropriate mix of residential sites from coming forward within the Plan period. The criteria should be removed as it is not effective and is not required in national planning policy.	Objects to proposed Policy BH1 criteria 14: meet national spaces standards as a minimum. This criteria places an undue burden on developers and could prevent an appropriate mix of residential sites from coming forward within the Plan period. The criteria should be removed as it is not effective and is not required in national planning policy.	Remove criteria 14 from Policy.	This Policy is not considered to threaten the viability or deliverability of house building and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. For clarity, the Council has proposed a minor addition to the supporting text in paragraph 9.4 to set out the period of transition in adopting the standards (M46).	New residential development needs to ensure that homes are built with enough indoor and outdoor space to meet the needs of the intended residents. This will be achieved through new housing meeting nationally described space standards as a minimum. <u>To allow for a period of transition, these standards will be introduced one year from the date of adoption of this plan.</u>
Nick	McLellan	Story Homes	PD876	Policy	BH1	Object			Story Homes consider that this policy is unsound as it is not effective, justified or consistent with national policy. The application of this requirement should only be applied where there is a robust evidence of need which also address viability		Story Homes consider that this policy is unsound as it is not effective, justified or consistent with national policy. The application of this requirement should only be applied where there is a robust evidence of need which also address viability	Story Homes consider that this policy is unsound as it is not effective, justified or consistent with national policy. The application of this requirement should only be applied where there is a robust evidence of need which also address viability	Remove the reference Large scale development should be supported by detailed Masterplans or development Frameworks and where appropriate, design codes.	The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive. The policy continues; "large scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes". If it can be demonstrated as part of the application process that the policy requirements are not appropriate or viable, a proposal may still be acceptable on balance when	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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									implications. There are concerns that this could significantly impact development viability and affordability. There is significant demand for entry level homes in the north east. In addition, it is not clear when the requirement for master plans or development frameworks will be applied. This requirement can be onerous, detrimental to housing delivery and ultimately stifle early delivery of housing sites.		implications. There are concerns that this could significantly impact development viability and affordability. There is significant demand for entry level homes in the north east. In addition, it is not clear when the requirement for master plans or development frameworks will be applied. This requirement can be onerous, detrimental to housing delivery and ultimately stifle early delivery of housing sites.	implications. There are concerns that this could significantly impact development viability and affordability. There is significant demand for entry level homes in the north east. In addition, it is not clear when the requirement for master plans or development frameworks will be applied. This requirement can be onerous, detrimental to housing delivery and ultimately stifle early delivery of housing sites.		determined on its merits. Design codes are not mandatory requirements and are only required where appropriate. The supporting text clarifies that the need for design codes will be established at the pre-application stage. The Council considers this Policy to be sound. Further justification for this Policy is set out in Compliance Statement Policy BH1.	
Joanne	Harding	Home Builders Federation	PD4749	Policy	BH1	Object		The HBF consider that the Council has not robustly justified the need and viability to request space standards. The evidence is limited in terms of the number of properties considered and the potential market comparisons made. It is not evidence what the need there is and no evidence that smaller properties are not selling, or that people are not satisfied with their properties. Space standards can have a negative impact upon viability, increase affordability and reduce customer choice.	The HBF consider that the Council has not robustly justified the need and viability to request space standards. The evidence is limited in terms of the number of properties considered and the potential market comparisons made. It is not evidence what the need there is and no evidence that smaller properties are not selling, or that people are not satisfied with their properties. Space standards can have a negative impact upon viability, increase affordability and reduce customer choice.		The HBF consider that the Council has not robustly justified the need and viability to request space standards. The evidence is limited in terms of the number of properties considered and the potential market comparisons made. It is not evidence what the need there is and no evidence that smaller properties are not selling, or that people are not satisfied with their properties. Space standards can have a negative impact upon viability, increase affordability and reduce customer choice.	The HBF consider that the Council has not robustly justified the need and viability to request space standards. The evidence is limited in terms of the number of properties considered and the potential market comparisons made. It is not evidence what the need there is and no evidence that smaller properties are not selling, or that people are not satisfied with their properties. Space standards can have a negative impact upon viability, increase affordability and reduce customer choice.	Delete part 14 - meet national spaces standards as a minimum (for residential)	This Policy is not considered to threaten the viability or deliverability of house building and its inclusion is justified by an evidence base in the Internal Space Standards (2018) report. The size and quality of new homes is an important influence on health and wellbeing and can affect educational attainment, family relationships and social cohesion. This report found that 66% of dwellings sampled across the plan area failed to meet NDSS. The requirements of this Policy are not considered to place any undue burden on developers or prevent an appropriate mix of residential sites from coming forward as the viability assessment was modelled on a variety of house types and sizes coming forward which meet NDSS. This modelling work concluded that residential development would still be viable while meeting NDSS. More justification is set out in Compliance Statement Policy BH1. For clarity, the Council has proposed a minor addition to the supporting text in paragraph 9.4 to set out the period of transition in adopting the standards (M46).	New residential development needs to ensure that homes are built with enough indoor and outdoor space to meet the needs of the intended residents. This will be achieved through new housing meeting nationally described space standards as a minimum. <u>To allow for a period of transition, these standards will be introduced one year from the date of adoption of this plan.</u>
James	Hudson	Environment Agency	PD219	Policy	BH2	Support with mods					The EA would like to see the inclusion that Policy BH2 is delivered in accordance with Policy WWE2 and WWE3.	The EA would like to see the inclusion that Policy BH2 is delivered in accordance with Policy WWE2 and WWE3.	The Plan should be read as a whole and it is not considered necessary to acknowledge within Policy BH2 that it shall be delivered in accordance with Policy WWE2 and WWE3. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k). The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2535	Policy	BH2	Support with mods					Generally support the policy but consider it is inflexible and onerous in places. Point 4 - it is unrealistic that details of the type, life cycle and source of materials will be known at the application stage. Point 5 - No evidence has been provided to justify this requirement. Point 6 - may be impractical or affect site viability. Point 7 - The information will not be known at the application stage in the majority of cases. Southern orientation of buildings may not always be possible. Some of the criteria for the Sustainability Statement are onerous and not deliverable.	Point 4 - state where practicable. Delete point 5. Point 6 remove reference to green roofs and add where appropriate. Point 7 remove reference to sustainable resource management. Para 9.8 amend text to improve flexibility.	Policy BH2 sets out a number of guidelines through which major development can help deliver the sustainability aims set out in the NPPF (2012). The policy offers flexibility and the 8 sub points of the policy are not prescriptive but intended as guidance. Further justification for Policy BH2 is set out in Compliance Statement Policy BH2. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Joanne	Harding	Home Builders Federation	PD4783	Policy	BH2	Object		HBF generally support the use of low carbon and renewable energy, however would question if the policy	HBF generally support the use of low carbon and renewable energy, however would question if the policy		HBF generally support the use of low carbon and renewable energy, however would question if the policy	HBF generally support the use of low carbon and renewable energy, however would question if the policy	The Council should support the maximisation of energy efficiency and the use of renewables and low	The requirement to maximise energy efficiency and integrate the use of low carbon and renewable energy is consistent with national policy. The Planning and Energy Act 2008 permits Local Authorities to request:	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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							is in accordance with the government intentions as set out in Fixing the Foundations and the Housing Standards Review which identifies energy to be a matter solely for Building Regulations with no optional standards. The requirements of this policy could potentially add to the costs of delivery of housing development which could have an implication for the viability of site.	is in accordance with the government intentions as set out in Fixing the Foundations and the Housing Standards Review which identifies energy to be a matter solely for Building Regulations with no optional standards. The requirements of this policy could potentially add to the costs of delivery of housing development which could have an implication for the viability of site.		is in accordance with the government intentions as set out in Fixing the Foundations and the Housing Standards Review which identifies energy to be a matter solely for Building Regulations with no optional standards. The requirements of this policy could potentially add to the costs of delivery of housing development which could have an implication for the viability of site.	is in accordance with the government intentions as set out in Fixing the Foundations and the Housing Standards Review which identifies energy to be a matter solely for Building Regulations with no optional standards. The requirements of this policy could potentially add to the costs of delivery of housing development which could have an implication for the viability of site.	carbon without it being a policy requirement.	a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In any event, Policy BH2 offers guidelines for sustainable development as opposed to a requirement as stated in the Planning and Energy Act 2008. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible. Further justification is set out in Compliance Statement BH2. The Council considers this policy to be sound.	require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD104	Policy	BH2	Support with mods					Historic England welcomes the 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.	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.	Historic England and The Council have agreed a Statement of Common Ground (SD.8k). 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.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4088	Policy	BH2	Object				Object to the requirement to maximise energy efficiency and integrate the use of low carbon energy within developments, as this falls outside the remit of planning and is dealt with through the building regulations. It is unlikely that the details of the type, life cycle and source of materials will be known at the planning application stage. Concerned that some of the requirements for the Sustainability Statement would be onerous and not deliverable.	Object to the requirement to maximise energy efficiency and integrate the use of low carbon energy within developments, as this falls outside the remit of planning and is dealt with through the building regulations. It is unlikely that the details of the type, life cycle and source of materials will be known at the planning application stage. Concerned that some of the requirements for the Sustainability Statement would be onerous and not deliverable.	Delete Point 1 of Policy BH2 and bullet point 2 of Paragraph 9.8. Delete Point 4 from Policy BH2. Delete bullet points 3 and 6 from Paragraph 9.8.	Policy BH2 sets out a number of guidelines through which major development can help deliver the sustainability aims set out in the NPPF (2012). The policy offers flexibility and the 8 sub-points of the policy are not prescriptive but intended as guidance. Further justification for Policy BH2 is set out in Compliance Statement Policy BH2. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1957	Policy	BH2	Object				Objects to Part 1 of Policy BH2 on the grounds that it is not consistent with the Written Ministerial Statement of 25 March that indicates that energy requirements for new homes is a matter solely for building regulations.	Objects to Part 1 of Policy BH2 on the grounds that it is not consistent with the Written Ministerial Statement of 25 March that indicates that energy requirements for new homes is a matter solely for building regulations.	Part 1 of Policy BH2 should be deleted.	The requirement to maximise energy efficiency and integrate the use of low carbon and renewable energy is not inconsistent with national policy. The Planning and Energy Act 2008 permits Local Authorities to request: a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In any event, Policy BH2 offers guidelines for sustainable development as opposed to a requirement as stated in the Planning and Energy Act 2008. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible. Further justification is set out in Compliance Statement BH2. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD1625	Policy	BH2	Object		Objects to Policy BH2 on the grounds that it is repeating national policy. The requirement to		Objects to Policy BH2 on the grounds that it is repeating national policy. The requirement to	Objects to Policy BH2 on the grounds that it is repeating national policy. The requirement to	Remove the element of the policy which conflicts with national guidance.	The requirement to maximise energy efficiency and integrate the use of low carbon and renewable energy is not inconsistent with national policy. The Planning and Energy Act 2008	The Council considers there have been no soundness or legal compliance issues raised by this

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								maximise energy efficiency and integrate the use of low carbon and renewable energy is inconsistent with the Government's intention to deliver improvements through Building Regulations with no optional standards.	maximise energy efficiency and integrate the use of low carbon and renewable energy is inconsistent with the Government's intention to deliver improvements through Building Regulations with no optional standards.		maximise energy efficiency and integrate the use of low carbon and renewable energy is inconsistent with the Government's intention to deliver improvements through Building Regulations with no optional standards.	maximise energy efficiency and integrate the use of low carbon and renewable energy is inconsistent with the Government's intention to deliver improvements through Building Regulations with no optional standards.		permits Local Authorities to request: a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In any event, Policy BH2 offers guidelines for sustainable development as opposed to a requirement as stated in the Planning and Energy Act 2008. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible. Further justification is set out in Compliance Statement BH2. The Council considers this policy to be sound.	representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD886	Policy	BH2	Object			Story Homes supports the Council's aims of ensuring that new development is sustainably designed and constructed. However, sub-point 1 is imposing new mandatory requirements in relation to energy efficiency which is not consistent with national policy in particular the Planning and Energy Act (2018) which removes the ability for local authorities to require energy efficiency. This policy could have viability implications. Sub point 4 is unsound as this level of information would not be known as outline planning application and therefore contrary to national policy. Sub-point 6 requirement to incorporate green roofs is too onerous. As is the requirement for Sustainability Statements. It is not practice for applicants to connect to or be ready to connect to decentralised heat or energy schemes.		Story Homes supports the Council's aims of ensuring that new development is sustainably designed and constructed. However, sub-point 1 is imposing new mandatory requirements in relation to energy efficiency which is not consistent with national policy in particular the Planning and Energy Act (2018) which removes the ability for local authorities to require energy efficiency. This policy could have viability implications. Sub point 4 is unsound as this level of information would not be known as outline planning application and therefore contrary to national policy. Sub-point 6 requirement to incorporate green roofs is too onerous. As is the requirement for Sustainability Statements. It is not practice for applicants to connect to or be ready to connect to decentralised heat or energy schemes.		Story Homes supports the Council's aims of ensuring that new development is sustainably designed and constructed. However, sub-point 1 is imposing new mandatory requirements in relation to energy efficiency which is not consistent with national policy in particular the Planning and Energy Act (2018) which removes the ability for local authorities to require energy efficiency. This policy could have viability implications. Sub point 4 is unsound as this level of information would not be known as outline planning application and therefore contrary to national policy. Sub-point 6 requirement to incorporate green roofs is too onerous. As is the requirement for Sustainability Statements. It is not practice for applicants to connect to or be ready to connect to decentralised heat or energy scheme, where feasible.	The requirement to maximise energy efficiency and integrate the use of low carbon and renewable energy is consistent with national policy. The Planning and Energy Act 2008 permits Local Authorities to request: a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development; a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development; development in their area to comply with energy efficiency standards that exceed the energy requirements of building regulations. In any event, Policy BH2 offers guidelines for sustainable development as opposed to a requirement as stated in the Planning and Energy Act 2008. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible. Further justification is set out in Compliance Statement BH2. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4106	Policy	BH6	Support					Concern over impacts on deliverability, as the digital infrastructure is not within the control of the development industry. The NPPF only requires local planning authorities to support the expansion of such infrastructure.	Concern over impacts on deliverability, as the digital infrastructure is not within the control of the development industry. The NPPF only requires local planning authorities to support the expansion of such infrastructure.	Amend Policy BH6 so that access to digital infrastructure is supported rather than required.	The NPPF (2012) states that, in preparing Local Plans, local planning authorities should support the expansion of electronic communication networks, including telecommunications and high speed broadband. This policy supports such development but at the same time must ensure that such equipment is sympathetically designed to Sunderland's townscape and countryside. This is in line with paragraph 43 of the NPPF (2012) which suggests that communications infrastructure should be sympathetically designed and camouflaged. Further justification is set out in Compliance Statement BH6. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD105	Policy	BH5	Support with mods					Historic England welcome part 3 and paragraph 9.19 but suggest the policy could be strengthened.	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.	The Council has agreed a Statement of Common Ground with Historic England (SD.8k). An addition modification is proposed within paragraph 9.19 to reflect this (M48).	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 such as	

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															relevant Character Appraisal and Management Strategies (CAMS).
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2551	Policy	BH6	Support with mods						The inclusion of digital infrastructure is not within the control of the development industry, so the policy could raise deliverability issues. The NPPF advises that local planning authorities should support the expansion of infrastructure not require development to include it.	Amend Policy BH6 so that it seeks to support high quality digital infrastructure from a range of providers rather than require it.	The NPPF (2012) states that, in preparing Local Plans, local planning authorities should support the expansion of electronic communication networks, including telecommunications and high speed broadband. This policy supports such development but at the same time must ensure that such equipment is sympathetically designed to Sunderland's townscape and countryside. This is in line with paragraph 43 of the NPPF (2012) which suggests that communications infrastructure should be sympathetically designed and camouflaged. Further justification is set out in Compliance Statement BH6. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Rory	Sherwood-Parkin	Virgin Media	PD3	Policy	BH6	Support with mods							The Policy should be changed to ensure that multiple broadband operators are consulted and that fibre/ultrafast/Fibre to the Premise (FTTP) is prioritised on new developments.	The Council considers the Policy to be sound and consistent with the requirements of the NPPF (2012). Further justification is set out in Compliance Statement BH6. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5057	Policy	BH7	Object		Consider that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.	Consider that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.		Consider that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.	Consider that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The Council considers each Housing Growth Area (HGA) site to comply with the requirements of this policy. HGA1 South West Springwell states that development should "ensure that the open aspect to Bowes Railway Scheduled Ancient Monument (SAM) is retained". HGA1 at South West Springwell is not considered to negatively impact on the setting of Bowes Railway Scheduled Ancient Monument (SAM) but will protect the open aspect to the SAM. More justification is set out in Compliance Statement Policy BH7. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD107	Paragraph	9.23	Support with mods						Historic England support the very positive approach to the historic environment.	Incorporate reference to the distinctive historic environment of Sunderland.	The Council agrees with Historic England. An addition modification (M49) is proposed within paragraph 9.23 to reflect this. A Statement of Common Ground (SD.8k) between the Council and Historic England has been agreed.	Sunderland benefits from a rich, diverse and distinctive cultural and built heritage historic environment that makes a fundamental contribution to the quality of the environment and providing a sense of place and belonging for its local communities.
Barbara	Hooper	Historic England	PD106	Policy	BH7	Support						Historic England welcome the very positive and comprehensive approach taken to the historic environment within this chapter and through this policy.	No modifications proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carol	Dougherty		PD8202	Policy	BH7	Object						Policy BH7 needs to be considered regarding Penshaw Monument and its environs with the view potentially being harmed by the proposed Renewable Energy Centre and the building of homes on land adjacent to Herrington Country Park.	Consideration needs to be given to safeguarding historical monuments such as Penshaw Monument.	HGA9 at Penshaw is not considered to impact on Penshaw Monument. The Policy text requires development to "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development of this site will meet the plan area's OAN and contribute to townscape quality. Further justification is set out in Compliance Statement BH7. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4395	Policy	BH7	Object						Policy BH7 seeks to conserve and enhance the historic environment, but there is no indication of how the plan will meet the demand for the extraction of building stone for the repair of heritage assets or other such conservation uses.	Consider how the plan will meet the demand for building stone.	Policy BH7 relates to the conservation and enhancement of the historic environment and the source of building materials is not relevant to this Policy. Further justification is set out in Compliance Statement BH7. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic	PD108	Policy	BH8	Support						Historic England	Amend the final	The Council agrees with Historic	Development affecting

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ra		England				rt with mods						support the policy and consider it be a very positive approach to protecting and enhancing heritage assets. However would suggest some minor modifications to the final sentence of part (1).	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.'	England. An addition modification (M50) is proposed to policy BH8.1 to reflect this. A Statement of Common Ground (SD.8k) between the Council and Historic England has been agreed.	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.
Nick	McLellan	Story Homes	PD5329	Policy	BH8	Object					Object to BH8 (sub point 8) relating to non-designated heritage assets. The wording is inconsistent with NPPF and should be reworded accordingly.		In accordance with paragraph 135 of NPPF, part 8 should be amended as follows: 8. Development affecting non-designated heritage assets should "be taken into account when determining planning applications. A balanced judgement will be required having regard to the scale of any harm or loss and the significance of the non-designated heritage asset."	The Council recognises the need for consistency with the NPPF (2012) in the conservation of heritage assets. The Council propose an additional modification to policy BH8.8 to address this representation (M51).	Development affecting non-designated heritage assets should conserve heritage assets, take account of their significance, their features and setting, and make a positive contribution to local character and distinctiveness.
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2574	Policy	BH8	Support					Part 8 of Policy BH8 which relates to non-designated heritage assets is more onerous than the NPPF which advises that the significance of the non-designated heritage asset should be taken into account. Therefore the policy is not considered sound.		Amend Policy BH8 so that it is consistent with the NPPF with regard to non-designated heritage assets.	The Council recognises the need for consistency with the NPPF (2012) in the conservation of heritage assets. The Council propose an additional modification to policy BH8.8 to address this representation (M51).	Development affecting non-designated heritage assets should conserve heritage assets, take account of their significance, their features and setting, and make a positive contribution to local character and distinctiveness.
Adam	McVickers	Persimmon Homes (Durham)	PD4113	Policy	BH8	Support with mods					Policy BH8 is more onerous than the NPPF in relation to the conservation of non designated heritage assets, as it requires these to be conserved rather than the significance of these taken into account.		Amend Policy BH8 to remove reference to the conservation of non-designated heritage assets and instead advise that their significance should be taken into consideration and a balanced judgement taken on the scale of any harm or loss.	The Council recognises the need for consistency with the NPPF (2012) in the conservation of heritage assets. The Council propose an additional modification to policy BH8.8 to address this representation (M51).	Development affecting non-designated heritage assets should conserve heritage assets, take account of their significance, their features and setting, and make a positive contribution to local character and distinctiveness.
Carol	Dougherty		PD8203	Policy	BH8	Object						Policy BH8 needs to be considered regarding Penshaw Monument and its environs with the view potentially being harmed by the proposed Renewable Energy Centre and the building of homes on land adjacent to Herrington Country Park.	Consideration needs to be given to safeguarding historical monuments such as Penshaw Monument.	HGA9 at Penshaw is not considered to impact on Penshaw Monument. The Policy text requires development to "minimise any impact on the areas landscape character, including sensitive boundary design that respects views and the setting of Penshaw Monument Grade I Listed Building". The development of this site will meet the plan area's OAN and contribute to townscape quality. Further justification is set out in Compliance Statement BH8. The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4397	Policy	BH8	Object						Policy BH8 seeks to conserve and enhance the historic environment, but there is no indication of how the plan will meet the demand for the extraction of building stone for the repair of heritage assets or other such conservation uses.	Consider how the plan will meet the demand for building stone.	Policy BH8 relates to the conservation and enhancement of heritage assets and the source of building materials is not relevant to this Policy. Further justification is set out in Compliance Statement BH8. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1393	Policy	BH8	Support						No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Barbara	Hooper	Historic England	PD109	Policy	BH9	Support with mods						Historic England support the approach, however	Clarify part (1) to reflect the NPPF paragraphs 132, 133	The Council agrees with Historic England that Policy BH9.1 is more onerous than the NPPF (2012). The	Development which adversely affects the archaeological interest

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											part 1 needs a slight clarification in accordance with paragraph 132 and 133 of the NPPF.	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...	Council agrees with Historic England that, to comply with the NPPF (2012), Policy BH9.1 should also recognise non-designated assets of equivalent archaeological significance. Two addition modifications are proposed to policy BH9.1 to reflect this (M52, M53). A Statement of Common Ground (SD.8k) between the Council and Historic England has been agreed.	or setting of a Scheduled Ancient Monument (or non-designated heritage asset of equivalent significance) will be refused unless wholly exceptional circumstances exist that satisfy the requirements of the NPPF.	
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2599	Policy	BH9	Support with mods				With regard to part 2(i) of Policy BH9 the NPPF seeks to sustain, conserve and enhance as opposed to protect. The Policy should adopt a consistent approach. It is considered that Part 2(ii) of the Policy is more onerous than the NPPF is this does not require the preservation of archaeology in situ.		Amend Policy BH9 so that it is consistent with the NPPF.	The Council considers this Policy to be consistent with the NPPF (2012). It gives preference to the preservation of heritage assets of archaeological interest in situ, but does not require it. This is not considered overly onerous.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
<p>Olwyn, Acklam, PD8221 Christine, Alder, PD8343 Jon, Almond, PD8366 Mary, Ashcroft, PD8422 R, Ashcroft, PD8423 Jasen, Balderson, PD8276 Yvonne, Barclay, PD8255 Tony, Barry, PD8270 Pauline, Beckinsale, PD8407 Terish, Bewick, PD8440 Malcolm, Bond, PD8428 Sarah, Bradley, PD8356 Anne, Brown, PD8435 Peter, Burdus, PD8438 Anne, Burdus, PD8439 Jill, Carroll, PD8391 Jason, Carroll, PD8393 Vera, Chisman, PD8212 Janet, Colclough, PD8350 Carol, Cutts, PD8455 David, Cutts, PD8456 Allo, Daley, PD8441 Anthony, Derbyshire, PD8273 John, Devine, PD8213 Alison, Devine, PD8215 Martin, Dixon, PD8461 David, Donaghey, PD8237 Janet, Doran, PD8253 Derek, Dunn, PD8223 Gavin, Elliott, PD8458 David, Fisher, PD8283 Marilyn, Ganley, PD8227 Yvonne, Gray, PD8228 Pauline, Green, PD8460 Graham, Hall, PD8311 Wendy, Hannah, PD8236 Michael, Hartnack, PD8463 James, Henderson, PD8251 Muriel, Heptinstall, PD8220 Shirley, Hetherington, PD8424 Keith, Hetherington, PD8425 Allison, Hicks, PD8238 Frank, Hunter, PD8226 Graham, Hurst, PD8385 Dawn, Hurst, PD8383 Tobias, Hurst, PD8248 Imogen, Hurst, PD8259 Ken, Kilbride, PD8389 D, Martin, PD8258 Michelle, Matlock, PD8191 Charlotte, Matlock, PD8195 Darren, Matlock, PD8211 Tania, McGhie, PD8219 Gill, McIntosh, PD8372 Dorothy, Miller, PD8374 Jackie, Moon, PD8217 P, Nelson, PD8280 Tonya, Owen, PD8275 Andrew, Parkin, PD8433 Jeroen, Pichal, PD8485 Ian, Porter, PD8436 Diane, Porter, PD8437 Helen, Precious, PD8175 Dave, Prosser, PD8398 William, Riley, PD8252 Clair, Roper, PD8459 Geoffrey, Scott, PD8319 Michael, Simmons, PD8378 Carole, Simpson, PD8336 Barbara, Smith, PD8376 Ceili, Smyth-Bates, PD8174</p>				Chapter	10	Object		Object to deletion of Green Belt. Do not consider that the Council has taken the correct approach to identifying defensible Green Belt boundaries.	Object to deletion of Green Belt. Do not consider that the Council has taken the correct approach to identifying defensible Green Belt boundaries.		Object to deletion of Green Belt. Do not consider that the Council has taken the correct approach to identifying defensible Green Belt boundaries.	Object to deletion of Green Belt. Do not consider that the Council has taken the correct approach to identifying defensible Green Belt boundaries.	The Plan should be withdrawn. The housing and spatial strategy is flawed and cannot be remedied.	The National Planning Policy Framework (NPPF) requires the Council to calculate its Objectively Assessed Housing Needs (OAHN) and then to provide through its Local Plan, a sufficient supply of sites to meet these identified needs. For clarity, as the Council has submitted its Core Strategy and Development Plan prior to the 24 January 2019, in accordance with Paragraph 214 of the revised NPPF (2018), the plan will be examined against the previous 2012 Framework. In order to calculate the OAHN for Sunderland, the Council has prepared a Strategic Housing Market Assessment (SHMA), which, amongst other things, calculates the OAHN using detailed demographic modelling work. This takes the 2012-based population and household projections with an uplift applied to reflect job growth as a result of the development of IAMP and the retention of a proportion of outward migrants and commuters through the delivery of larger executive dwellings. Further justification for the approach to OAHN is set out in the SHMA addendum (2018) and the Compliance Statement for Policy SP1. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The evidential basis justifying the release of the housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Jennifer, Staward, PD8375 Joe, Stewart, PD8426 Pam, Stewart, PD8427 Valerie, Swaine, PD8453 Margaret, Taylor, PD8395 Paul, Thompson, PD8462 Brenda, Thornton, PD8434 John, Towner, PD8250 Tom, Turner, PD8169 Margaret, Walton, PD8256 Alan, Walton, PD8257 Carol, Ward, PD8177 Melanie, Wight, PD8390 Eileen, Wight, PD8386 Richard, Wight, PD8388 Michael, Wooler, PD8401 Andy, Wraith, PD8189															
Barbara	Hooper	Historic England	PD110	Policy	NE1	Support						Historic England welcome this policy, in particular the recognition (in paragraph 10.2) that GI can include historic environments.	No modification proposed	The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Colin	Ford		PD178	Policy	NE1	Object					The policy is considered to be unsound as it does not acknowledge the potential for development to enhance existing ecological area and green infrastructure. It is based on the assumption that all development will have an adverse impact on green infrastructure and ecological interests.	The policy is considered to be unsound as it does not acknowledge the potential for development to enhance existing ecological area and green infrastructure. It is based on the assumption that all development will have an adverse impact on green infrastructure and ecological interests.	Separate section 3 should be added to the policy which states that development which has the potential to significantly enhance and safeguard existing green infrastructure will be promoted and that the benefits of the development will be secured by conditions or spate legal agreement where appropriate.	The policy states that in order to maintain and improve the GI network, development should address the points listed. It does not state that all development will have an adverse impact on green infrastructure. The Council would agree with Mr Ford's second point that it is possible for development to achieve net gains to GI corridors, but would reassert that the policy does not imply anything to the contrary.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1181	Policy	NE1	Support						Natural Capital should be referenced in the plan, ensuring that development, where appropriate, takes it into account and applies its principles. Bluespaces needs to be mentioned in the Glossary.	Policy should be amended to include Natural Capital.	The Council considers that the Plan (read as a whole) contains a full range of policies that address the needs of natural capital and will ensure that development, where appropriate, takes it into account and applies its principles. As the Plan adheres to the 2012 NPPF (which makes no mention of natural capital).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Unknown		Church Commissioners For England	PD1790	Policy	NE1	Object						NE1 is considered to be unsound as there is a disconnect between the aspirations of the GI corridor locations and the developments proposed to come forward through the SHLAA. There is insufficient evidence in the Plan to justify the GI network and as a result it is considered that the GI corridor shown on Figure 40 should be removed at Philadelphia.	GI corridor at Philadelphia should be removed.	In relation to the Church Commissioners site at Philadelphia, paragraph 10.6 of the CSDP makes clear that the Allocations & Designations Plan will identify land to deliver this policy, and therefore not the CSDP- the alignment shown in Figure 40 is an indicative strategic-level map. Furthermore, the policy clearly states that corridor requirements will be identified in the forthcoming GI Delivery Plan. The policy requirements are not considered to be onerous, and it includes the caveat that development should consider the listed policy requirements, which are considered to follow best planning practice.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD151	Chapter	10	Support						Northumbrian Water are fully supportive of policy NE1 and are very pleased to see the inclusion in point iv of reference to flood risk and watercourse management as part of climate change mitigation and adaptation. It is pleasing to see that the CSDP makes reference to the number of benefits Green infrastructure provides including the reduction of flood risk and how this will aid the growth in the area.	No modification proposed.	The Council considers this policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4127	Policy	NE1	Object						Object to the identification of a district corridor in	Remove the district GI corridor round the village of Newbottle	In relation to the Persimmon Homes objection, the Council acknowledges that changes have been made to this	The Council considers there have been no soundness or legal

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												Figure 40 around the village of Newbottle and intersecting with the western edge of Newbottle and Persimmon Homes' current development of North of Coaley Lane. The new development effectively joins Newbottle and Sunnyside and the characteristics of a district corridor no longer apply.	and intersecting with the western edge of Newbottle and Persimmon Homes' current development of North of Coaley Lane.	area, and that recent planning approvals will narrow the GI corridor in question considerably, to the south of Coaley Lane. Nevertheless, the Corridor remains apt and appropriate, providing a continuous link (albeit narrow) from Philadelphia/Success southwards to Houghton Colliery. It should also be noted that numerous other local GI corridors are narrow, and may be more limited in their overall GI purpose (perhaps more recreational in nature rather than multi-functional). Nevertheless, the Council does not support the withdrawal of this corridor, and it will be considered in more detail in the GI Delivery Plan and the Allocations & Designations Plan.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1961	Policy	NE1	Object		Objects to Policy NE1 on the grounds that development that incorporates GI and can maintain links through such corridors should be permitted and where GI can be enhanced through development this should be encouraged.					Part 2 of Policy NE1 should be revised to allow development which incorporates GI links through it.	The Council notes the reference in the Strategy framework (paragraph 4.6) that states that GI corridors are not intended to preclude development from occurring within these areas. However, the Strategy states clearly that corridor connectivity is paramount, and the Strategy specifically identifies current barriers to connectivity that should be addressed. Part 2 of the policy does not preclude development, but supports the approach taken in the city's GI Strategy. It relates purely to development that would "sever or significantly reduce green infrastructure" - so does not preclude all development- and even then provides a caveat whereby such an impact could be acceptable if the benefits demonstrably outweigh the impacts. This approach follows NPPF paragraph 171 which states that Plans should "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure". In this respect the Council does not support the objection and that the current policy wording is sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Skinner		PD8499	Chapter	10	Object			Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.			Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.	Development should be focussed on brownfield sites and be for bungalows and affordable housing, not multi-storey units and executive housing. Basic facilities should be maintained at Seaburn and public transport links improved. Vaux site should be used to provide a walking and cycling link from the city centre to the harbour, not offices. The affordable housing requirement should be raised to 50% instead of 15%.	Numerous rounds of consultation have been undertaken by the Council which have exceeded the minimum requirements set out within legislation and the adopted Statement of Community Involvement. Many of the issues raised are non-strategic, and can be reviewed as part of the Allocations and Designations Plan. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. Further justification is set out within the Compliance Statement. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Unknown		Church Commissioners For England	PD5248	Policy	NE1	Object						Policy NE1 is inconsistent with other policies in the Plan. For example Green Infrastructure runs through the SSGA. The evidence for designating the sites as Green Infrastructure is not clear. Suitable mitigation can be provided for the SSGA. Figure 40 should be amended to exclude the Green Infrastructure Corridor from the SSGA.	Figure 40 should be amended to exclude the Green Infrastructure Corridor from the SSGA.	In relation to the Church Commissioners site at Philadelphia, paragraph 10.6 of the CSDP makes clear that the Allocations & Designations Plan will identify land to deliver this policy, and therefore not the CSDP- the alignment shown in Figure 40 is an indicative strategic-level map. Furthermore, the policy clearly states that corridor requirements will be identified in the forthcoming GI Delivery Plan. The policy requirements are not considered to be onerous, and it includes the caveat that development should consider the listed policy requirements, which are considered to follow best planning practice.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5068	Policy	NE1	Object		Sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife	Sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife		Sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife	Sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife	Protect the existing Green Belt boundaries and remove the policies	The Council has provided detailed responses regarding sites HGA1, HGA2 and HGA3 under Policy SS2 and considers that the impact to these	The Council considers there have been no soundness or legal compliance issues

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		n						corridors which will obviously be affected by development.	corridors which will obviously be affected by development.		corridors which will obviously be affected by development.	corridors which will obviously be affected by development.	that propose deletion.	corridors is minor and can be adequately mitigated for. These responses include maps that show the impact to GI corridors around the Springwell Village area. With regards to the corridor impacts: At site HGA1, the corridor will be reduced by 9% from 326m to 296m- this impact is considered to be minor and with sensitive design can be adequately mitigated for. At site HGA2, it is considered that this corridor is already partly compromised at Peareth Hall Road. The current width of the corridor at this point is as little as 20m (shelter belt to the A194M). The shelter belt alongside HGA2 is at least 30m currently, and sensitive scheme design can enable this shelter belt to be widened as necessary, so as to minimise pollution from the motorway into the site. At site HGA3, the corridor will be reduced by 8% from 1,334m to 1,222m- this impact is considered to be minor and with sensitive design can be adequately mitigated for.	raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3250	Policy	NE1	Support						Support Policy NE1, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ellen	Bekker	Natural England	PD2762	Policy	NE1	Support						Supports policy, and in particular the focus on multi-functional character of GI and the link to the GI Delivery Plan.	No modifications proposed.	Support noted. A Statement of Common Ground has been agreed between the Council and Natural England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor	Wimpey	Taylor Wimpey	PD3769	Policy	NE1	Support						Supports the policy and Figure 40 which shows the GI corridors broadly following undeveloped areas. Support paragraph 10.5 which recognises that development brings opportunities to enhance the network and deliver new green infrastructure.	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD212	Policy	NE1	Support with mods						The EA support the policy but suggests that the Policy is renamed Green and Blue Infrastructure	The EA suggest the following modifications; 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 ix 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 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	Additional modifications are proposed to paragraph 10.2, 10.8 and the glossary to reflect this (M55, M57 and M87). A Statement of Common Ground between the Council and the Environment Agency has been agreed (SD.8k).	10.2 - 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. 10.8 - Not identified as a conservation priority but which are considered locally important including <u>water-dependent, aquatic and marine habits and species.</u> <u>Glossary – Bluespace</u> <u>Blue space refers to visible water within open spaces, and includes beaches, rivers, streams, ponds, lakes, canals and fountains.</u>

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													emphasise the often forgotten water environment.		
Nick	McLellan	Story Homes	PD5341	Policy	NE2	Object			As currently drafted, the policy is not sound as it is neither effective nor consistent with national policy. Paragraph 114 of the NPPF states that local planning authorities should plan positively for the "creation, protection, enhancement and management of networks of biodiversity and green infrastructure". Paragraph 10.14 should therefore be amended otherwise the policy as currently drafted is not sound.		As currently drafted, the policy is not sound as it is neither effective nor consistent with national policy. Paragraph 114 of the NPPF states that local planning authorities should plan positively for the "creation, protection, enhancement and management of networks of biodiversity and green infrastructure". Paragraph 10.14 should therefore be amended otherwise the policy as currently drafted is not sound.		Alteration to Policy NE2 (sub-point 6) - additional sentence to be added "Support will also be given to development proposals which seek to enhance wildlife corridors." Alteration to paragraph 10.14: Wildlife corridors are strategic networks which transcend administrative boundaries and are instrumental in the movement of species within and beyond Sunderland. "Development brings opportunities to enhance the network and deliver new green infrastructure." The nature conservation value of wildlife corridors should be maintained and enhanced as part of any planning approvals, "unless applicants can provide appropriate mitigation and/or compensatory measures."	The proposed changes to Policy NE2(6) and paragraph 10.14 are not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ellen	Bekker	Natural England	PD2751	Policy	NE2	Object	Broad support for much of the policy including support for inclusion of net gains for biodiversity. However, find the policy overall to be unsound because it lacks a clear reference to the mitigation measures proposed in the Habitats Regulations Assessment, whilst there is uncertainty whether these measures can be delivered.				Broad support for much of the policy including support for inclusion of net gains for biodiversity. However, find the policy overall to be unsound because it lacks a clear reference to the mitigation measures proposed in the Habitats Regulations Assessment, whilst there is uncertainty whether these measures can be delivered.		Currently, section 10.9 refers to developer contributions or conditions to implement mitigation measures. For clarity, the policy or supporting text should also include direct reference to any mitigation plan or equivalent delivery mechanism developed for housing development within the zone of influence.	The Council has agreed a Statement of Common Ground with Natural England (SD.8k). Additional modifications are proposed to paragraph 10.9 (M58) and 10.16 (M59) to reflect this.	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 a Habitats Regulations Assessment. <u>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 and Monitoring (SAMM) and the provision of Suitable Alternative Natural Greenspace (SANG).</u> 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. <u>Compensatory measures will be secured to ensure that the overall coherence of the network of European sites is maintained.</u> 10.16 The forthcoming Biodiversity and Geodiversity SPD will support the natural environment policies, and this will include <u>clarification regarding the types of development that require delivery of net</u>

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															gains in biodiversity. The A&D Plan will identify land to deliver this policy.
Caroline	Strugneli	Bellway Homes Ltd	PD1970	Policy	NE2	Object							Amend Policy NE2 to indicate that where there are adverse impacts, mitigation can also be offered.	The Council considers that part 4(i) and (ii) allows for development provided that the need for the development clearly outweighs the need to safeguard the intrinsic value of the site, and is in line with paragraph 113 of the 2012 NPPF.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey		Taylor Wimpey	PD3784	Policy	NE2	Support with mods						General policy support but minor changes requested to NE2 (1) and (6). States that paragraphs 10.14 and 10.5 conflict in relation to wildlife corridors and GI corridors.	NE2 (1) opening sentence to change from "will" to "will seek to". NE2 (6) to add additional sentence at end "Support will be given to development which enhances the provision of GI in the wildlife corridors."	The comment regarding NE2(1) is noted, and the Council has amended Policy NE2(1) to state "where appropriate", with regards to development. The Council will be producing a Biodiversity SPD which will set out what will constitute net gain, what development is appropriate in terms of delivering net gain and how this should be delivered, to provide clarity to developers. This follows a joint policy approach with Gateshead and South Tyneside, and has been endorsed by Natural England. In general, net gain should not be perceived as a barrier to development and its inclusion into our policy is in keeping with the NPPF both versions as well as helping to deliver the Governments 25 year plan where Biodiversity is incorporated as a fundamental component of Environmental net gain. It will also accord with the introduction of British Standards for Net Gain which is due in 2019. With reference to NE2(6), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2. The additional text of criterion (6) of NE2 is not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects (M56).	1. Biodiversity and geodiversity will be protected, enhanced and managed by requiring development to <u>Where appropriate, development must demonstrate how it will:</u> i. provide net gains in biodiversity; and ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in accordance with the mitigation hierarchy; 2. <u>proposals</u> development that <u>would</u> have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are: i. no suitable alternatives; ii. imperative reasons of overriding public interest; iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites; 3. <u>development that would adversely affect</u> a Site of Special Scientific Interest, either directly or indirectly, will be required to demonstrate that: i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the nature conservation value of the site; 4. <u>development that would adversely affect</u> a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that: i. there are no reasonable alternatives;

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															<p>and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site;</p> <p>5. <u>development</u> that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <p>i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site;</p> <p>6. <u>proposals</u> development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor.</p>
Jennifer	Nye	Hellens Land Ltd	PD5080	Policy	NE2	Support with mods						<p>General policy support but minor changes requested to NE2 (1) and (6). States that paragraphs 10.14 and 10.5 conflict in relation to wildlife corridors and GI corridors.</p>	<p>NE2 (1) opening sentence to change from "will" to "will seek to". NE2 (6) to add additional sentence at end "Support will be given to development which enhances the provision of GI in the wildlife corridors."</p>	<p>The comment regarding NE2(1) is noted, and the Council has amended Policy NE2(1) to state "where appropriate", with regards to development. The Council will be producing a Biodiversity SPD which will set out what will constitute net gain, what development is appropriate in terms of delivering net gain and how this should be delivered, to provide clarity to developers. This follows a joint policy approach with Gateshead and South Tyneside, and has been endorsed by Natural England. In general, net gain should not be perceived as a barrier to development and its inclusion into our policy is in keeping with the NPPF both versions as well as helping to deliver the Governments 25 year plan where Biodiversity is incorporated as a fundamental component of Environmental net gain. It will also accord with the introduction of British Standards for Net Gain which is due in 2019. With reference to NE2(6), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2. The additional text of criterion (6) of NE2 is not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects (M56).</p>	<p>1. <u>Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to Where appropriate, development must demonstrate how it will:</u></p> <p>i. provide net gains in biodiversity; and</p> <p>ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in accordance with the mitigation hierarchy;</p> <p>2. <u>proposals</u> development that would have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are:</p> <p>i. no suitable alternatives;</p> <p>ii. imperative reasons of overriding public interest;</p> <p>iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and</p> <p>iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites;</p> <p>3. <u>development</u> that would adversely affect a Site of Special Scientific Interest, either directly or</p>

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															<p>indirectly, will be required to demonstrate that:</p> <p>i. there are no reasonable alternatives; and</p> <p>ii. the case for development clearly outweighs the nature conservation value of the site;</p> <p>4. development that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</p> <p>i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site;</p> <p>5. development that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <p>i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site;</p> <p>6. proposals development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor.</p>
Barbara	Hooper	Historic England	PD111	Paragraph	10.3	Support						Historic England welcome the recognition that burial spaces are often of historic interest and included designated assets.	No modification proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3147	Policy	NE2	Object						Not justified because the policy does not sufficiently outline the expectations of developers for applications that require a HRA. Similarly, it does not fully consider strategic priorities resulting in it failing to be effective.	An additional section should be included that relates to proposals that may impact upon European protected sites and that require consideration of impacts on biodiversity, including displacement through the HRA process.	The Council has undertaken HRA for all allocated sites for the Core Strategy, and as a result, 2 sites have been identified as having a potential impact on the European sites. Mitigation measures have been identified for both of these sites and are included in the Core Strategy HRA. This Plan does not allocate housing- this will be addressed in full at the next Plan stage (Allocations & Designations), and will be supported by an appropriate strategic mitigation strategy for impacts on European designations.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Unknown		Church Commissioners For England	PD1795	Policy	NE2	Object					Object to NE2 because it does not accord with national guidance- policy is too prescriptive with regards to net gains in biodiversity.		Criterion 11 should be amended to state "wherever possible".	The comment regarding NE2(1) is noted, and the Council has amended Policy NE2(1) to state "where appropriate", with regards to development. The Council will be producing a Biodiversity SPD which will set out what will constitute net gain, what development is appropriate in terms of delivering net gain and how this should be delivered, to provide clarity to developers. This follows a joint policy approach with Gateshead and South Tyneside, and has been endorsed by Natural England. In general, net gain should not be perceived as a barrier to development and its inclusion into our policy is in keeping with the NPPF both versions as well as helping to	1. Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to Where appropriate, development must demonstrate how it will: <ul style="list-style-type: none"> i. provide net gains in biodiversity; and ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in

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													<p>deliver the Governments 25 year plan where Biodiversity is incorporated as a fundamental component of Environmental net gain. It will also accord with the introduction of British Standards for Net Gain which is due in 2019. With reference to NE2(6), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2 (M56).</p>	<p>accordance with the mitigation hierarchy;</p> <p>2. proposals development that would have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are:</p> <ol style="list-style-type: none"> i. no suitable alternatives; ii. imperative reasons of overriding public interest; iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites; <p>3. development that would adversely affect a Site of Special Scientific Interest, either directly or indirectly, will be required to demonstrate that:</p> <ol style="list-style-type: none"> i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the nature conservation value of the site; <p>4. development that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</p> <ol style="list-style-type: none"> i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site; <p>5. development that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <ol style="list-style-type: none"> i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site; <p>6. proposals development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the</p>

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Unknown		Church Commissioners For England	PD5249	Policy	NE2	Object					Object to Policy NE2 on the grounds that it is not consistent with national policy. Paragraph 174 of the 2018 Framework indicates Local Plans should pursue net gains, rather than require them, as it is not always achievable.		Amend Policy NE2 to state that wherever possible net gains in biodiversity should be provided.	The comment regarding NE2(1) is noted, and the Council has amended Policy NE2(1) to state "where appropriate", with regards to development. The Council will be producing a Biodiversity SPD which will set out what will constitute net gain, what development is appropriate in terms of delivering net gain and how this should be delivered, to provide clarity to developers. This follows a joint policy approach with Gateshead and South Tyneside, and has been endorsed by Natural England. In general, net gain should not be perceived as a barrier to development and its inclusion into our policy is in keeping with the NPPF both versions as well as helping to deliver the Governments 25 year plan where Biodiversity is incorporated as a fundamental component of Environmental net gain. It will also accord with the introduction of British Standards for Net Gain which is due in 2019. With reference to NE2(6), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2 (M56).	value and integrity of the corridor. 1. Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to <u>Where appropriate, development must demonstrate how it will:</u> i. provide net gains in biodiversity; and ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in accordance with the mitigation hierarchy; 2. proposals development that would have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are: i. no suitable alternatives; ii. imperative reasons of overriding public interest; iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites; 3. development that would adversely affect a Site of Special Scientific Interest, either directly or indirectly, will be required to demonstrate that: i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the nature conservation value of the site; 4. development that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that: i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site; 5. development that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:

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															<p>i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site;</p> <p>6. proposals development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor.</p>
James	Ebdale		PD3251	Policy	NE2	Support						Support Policy NE2, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD2656	Policy	NE2	Support with mods					The policy is not fully consistent with the NPPF- the NPPF does not require all planning proposals to provide a net increase in biodiversity, nor does it require proposals with less than significant adverse harm to biodiversity to be relocated on alternative sites.		Policy should be altered to state "provide net gains in biodiversity where possible ; and avoid or minimise significant adverse impacts on biodiversity in accordance with the mitigation hierarchy.	The comment regarding NE2(1) is noted, and the Council has amended Policy NE2(1) to state "where appropriate", with regards to development. The Council will be producing a Biodiversity SPD which will set out what will constitute net gain, what development is appropriate in terms of delivering net gain and how this should be delivered, to provide clarity to developers. This follows a joint policy approach with Gateshead and South Tyneside, and has been endorsed by Natural England. In general, net gain should not be perceived as a barrier to development and its inclusion into our policy is in keeping with the NPPF both versions as well as helping to deliver the Governments 25 year plan where Biodiversity is incorporated as a fundamental component of Environmental net gain. It will also accord with the introduction of British Standards for Net Gain which is due in 2019. With reference to NE2(6), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policy NE1 and NE2 (M56).	<p>1. Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to Where appropriate, development must demonstrate how it will:</p> <p>i. provide net gains in biodiversity; and</p> <p>ii. avoid (through locating on an alternative site with less harmful impacts) or minimise adverse impacts on biodiversity and geodiversity in accordance with the mitigation hierarchy;</p> <p>2. proposals development that would have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are:</p> <p>i. no suitable alternatives;</p> <p>ii. imperative reasons of overriding public interest;</p> <p>iii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and</p> <p>iv. development will only be permitted where the council is satisfied that any necessary mitigation is included such that, in combination with other development, there will be no significant effects on the integrity of European Nature Conservation Sites;</p> <p>3. development that would adversely affect a Site of Special Scientific Interest, either directly or indirectly, will be required to</p>

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															<p>demonstrate that:</p> <ul style="list-style-type: none"> i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the nature conservation value of the site; <p>4. development that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</p> <ul style="list-style-type: none"> i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site; <p>5. development that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <ul style="list-style-type: none"> i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site; <p>6. proposals development that would have a significant adverse impact on the value and integrity of a wildlife corridor will only be permitted where suitable replacement land or other mitigation is provided to retain the value and integrity of the corridor.</p>
Colin	Ford		PD179	Policy	NE2	Object						<p>The policy is considered to be unsound as it fails to acknowledge that developments also have the ability to have a positive impact on biodiversity and geodiversity. The policy only assumes development would have an adverse impact. It should be noted that in regards to SSS1s and Local Wildlife the policy only considers development which will directly or indirectly impact designation in an adverse manner. The policy only make provision for development if it can be shown that there are no reasonable alternative and the case for development outweighs the nature conservation value of the site. Therefore the policy omits any consideration of development which may have beneficial impact upon biodiversity and geodiversity and specifically SSS1s and local nature reserves.</p>	<p>The policy should include an additional section which states that development which has the potential to significantly enhance and safeguard existing green infrastructure will be promoted and that the benefits of the development will be secured by condition or separate legal agreement where appropriate.</p>	<p>In response, the proposed changes to Policy NE2(6) and paragraph 10.14 are not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects.</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>
Taylor Wimpey	Persimon Homes	Burdon Lane Consortiu	PD2679	Policy	NE2	Support with mods			Welcome changes to Policy NE2 from previous draft, but				Amendments proposed to Policy and Paragraph 10.14	In response, the Council would note that GI corridors and wildlife corridors are different, and require	The Council considers there have been no soundness or legal

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	and Story Homes	m						further minor changes are required to make policy effective.				to ensure consistency in approach.	different degrees/types of protection, which is reflected in Policy NE1 and NE2. The additional text of criterion (6) of NE2 is not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Amy F	Ward	Barratt David Wilson Homes	PD1628	Policy	NE4	Object		Concerned that Part 3 stem 1) of Policy NE4 requires onsite greenspace of 0.9ha per 1,000 bedspaces, which would result in between a quarter and a third of potential housing sites being greenspace. The Policy is inconsistent with Policy ID2.	Concerned that Part 3 stem 1) of Policy NE4 requires onsite greenspace of 0.9ha per 1,000 bedspaces, which would result in between a quarter and a third of potential housing sites being greenspace. The Policy is inconsistent with Policy ID2.	Concerned that Part 3 stem 1) of Policy NE4 requires onsite greenspace of 0.9ha per 1,000 bedspaces, which would result in between a quarter and a third of potential housing sites being greenspace. The Policy is inconsistent with Policy ID2.	Concerned that Part 3 stem 1) of Policy NE4 requires onsite greenspace of 0.9ha per 1,000 bedspaces, which would result in between a quarter and a third of potential housing sites being greenspace. The Policy is inconsistent with Policy ID2.	Amend Policy NE4 to include flexibility and to seek greenspace associated contributions rather than require.	The Council disagrees with this conclusion and contends that a far lower percentage of housing sites would be given over to greenspace. As an example: Site x = 11 hectares in gross size. The Council would apply 75% net developable area (this accounts for essential infrastructure like roads, for example). This equates to 8.25ha. Using an average of 30 dwellings per hectare and average of 4 bedspaces as an average for these properties = 990 bedspaces. 9 hectares/1000 bedspaces = 0.9 hectares of greenspace equates to 8% of the site to provide greenspace. By contrast, using County Durham 2018 OSNA standards (and assuming an identical net developable area and 30 dwellings per hectare): there would be a yield of 248 homes and a population of 570 people (applying 2.3 households per dwelling as an average). County Durham OSNA applies 3.89 hectares per 1000 population, which equates to 2.21 hectares of greenspace required. In conclusion, the Council considers that the approach is realistic and provides considerably less greenspace than that suggested by Barratt DW Homes. The Council proposed the following modification to be in accordance with the UDP (M58).	Three bedroom dwelling – 54 bedspaces
Nick	McLellan	Story Homes	PD5367	Policy	NE4	Object		Object to NE4 as it is not effective or justified. Paragraph 10.26 is not reflective of household occupancy rates and should follow County Durham approach and to comply with tests within NPPF paragraph 56.			Object to NE4 as it is not effective or justified. Paragraph 10.26 is not reflective of household occupancy rates and should follow County Durham approach and to comply with tests within NPPF paragraph 56.	Paragraph 10.26 to be altered to state that: "Requirements will be calculated based on the average dwelling occupancy rate of 2.4 people per dwelling."	The Council considers that the approach in Policy NE4 and paragraph 10.26 is realistic. Furthermore, if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare/1000 population rate to be applied - the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. The Council propose an additional modification to paragraph 10.26 to address this representation (M61).	Three bedroom dwelling – 54 bedspaces
Adam	McVickers	Persimmon Homes (Durham)	PD4143	Policy	NE3	Object					Object to Policy NE3 on the grounds that no definition is given to what is considered to represent a significant tree, woodland or hedgerow.	A clear definition for significant tree, woodland and hedgerow should be provided and clarification given that points 1 and 2 only relate to such features. Other trees out with the definition should be assessed against points 4 and 5 only commensurate with their quality.	The Council would reiterate that the CSDP Glossary defines the term "significant tree". Furthermore, Policy NE3 also provides detail in relation to woodland and to Tree Preservation Orders (TPOs), refers to "important" hedgerows being defined by the Hedgerow Regulations 1997, and states that trees and hedgerows should be considered on individual merit as well as their contribution to amenity and interaction within the broader landscape setting.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3254	Policy	NE3	Support					Support Policy NE3, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Jameson	Miller Homes Ltd - NE Region	PD894	Policy	NE4	Support					SHLAA Site 154A comprises of grassland which is maintained by Sunderland University. Open Space Assessment prepared in support of planning application demonstrates a surplus of provision in Seaburn area, which is consistent with the Council's Playing Pitch Plan.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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												The Assessment concluded that residential development would not create any negative impact on greenspace provision. Exclusion of the site from the Greenspace Strategy set out in Policy NE4 is supported.			
James	Ebdale		PD3255	Policy	NE4	Support						Support Policy NE4, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD213	Policy	NE4	Support with mods						The EA 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.	The policy should include a reference to bluespace in title/text to promote and strengthen the requirement and provision of blue space.	The Council acknowledges the request but considers that the emphasis of the policy focuses on greenspace, whilst still informed by the principles of green and blue infrastructure. The title of policy NE1 is proposed to be changed to "green and blue infrastructure", and this reflects the much broader themes encompassed within this policy. Supporting the Greenspace policy, paragraph 10.23 clarifies the types of greenspaces definitions, and this includes "coast and estuary". Other bluespaces such as lakes, ponds, SUDS, streams and burns are included in the Greenspace Audit within wider greenspace designations, such as natural greenspaces, amenity greenspaces, formal parkland or country parks. The Council therefore considers that bluespaces are fully addressed within the current approach to NE4, and with the amendments to NE1 to incorporate blue infrastructure, the proposed change to NE4 is not supported (M54 and M87). The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k).	NE1 Green and Blue Infrastructure <u>Glossary - Bluespace</u> <u>Blue space refers to visible water within open spaces, and includes beaches, rivers, streams, ponds, lakes, canals and fountains.</u>
Taylor Wimpey	Taylor Wimpey	Taylor Wimpey	PD3820	Policy	NE4	Support with mods						Supports the policy overall and the flexibility that has been added into the policy. Paragraph 10.25 should be revised to recognise that SUDS and verges can provide natural greenspace within developments. Paragraph 10.25 is not reflective of household occupancy rates and should follow County Durham approach and to comply with tests within NPPF paragraph 56.	Supporting paragraph 10.25 proposed to be changed. Supporting paragraph 10.26 to state "The greenspace requirement will be calculated based on the average dwelling occupancy rate of 2.4 people per dwelling."	The Council considers that the provision within the policy relates to the provision of "amenity greenspace", rather than natural greenspace, which neither conventional grass verges nor SUDS would normally provide. Furthermore, the Council reiterates that paragraph 10.25 refers to "heavily engineered SUDS" to not be included within the calculation, so does not necessarily discount all forms of SUDS from the calculation. The Council's ultimate aim is to ensure that developments come forward that provide amenity greenspace that local residents can use, enjoy and appreciate, greenspace that helps to support and encourage physical and healthy lifestyles, rather than provision that is limited to greenspace and bluespace provision that is primarily there to support physical road and flood infrastructure. The Council considers that the approach in Policy NE4 and paragraph 10.26 is realistic. Furthermore, if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare / 1000 population rate to be applied" the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. The Council does, however, acknowledge that paragraph 10.26 includes a table that shows three bedroom dwellings equating to 5 bedspaces. This has been raised as an incorrect assumption by developers. The Council propose an additional modification to paragraph 10.26 to address this representation (M61).	Three bedroom dwelling – 5 4 bedspaces
Jennif	Nye	Hellens	PD508	Policy	NE4	Suppo						Supports the policy	Supporting	The Council considers that the	Three bedroom

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er		Land Ltd	2			rt with mods						overall and the flexibility that has been added into the policy. Paragraph 10.25 should be revised to recognise that SUDS and verges can provide natural greenspace within developments. Paragraph 10.25 is not reflective of household occupancy rates and should follow County Durham approach and to comply with tests within NPPF paragraph 56.	paragraph 10.25 proposed to be changed. Supporting paragraph 10.26 to state "The greenspace requirement will be calculated based on the average dwelling occupancy rate of 2.4 people per dwelling."	provision within the policy relates to the provision of "amenity greenspace", rather than natural greenspace, which neither conventional grass verges nor SUDS would normally provide. Furthermore, the Council reiterates that paragraph 10.25 refers to "heavily engineered SUDS" to not be included within the calculation, so does not necessarily discount all forms of SUDS from the calculation. The Council's ultimate aim is to ensure that developments come forward that provide amenity greenspace that local residents can use, enjoy and appreciate, greenspace that helps to support and encourage physical and healthy lifestyles, rather than provision that is limited to greenspace and bluespace provision that is primarily there to support physical road and flood infrastructure. The Council considers that the approach in Policy NE4 and paragraph 10.26 is realistic. Furthermore, if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare/1000 population rate to be applied" the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. The Council does, however, acknowledge that paragraph 10.26 includes a table that shows three bedroom dwellings equating to 5 bedspaces. This has been raised as an incorrect assumption by developers. The Council propose an additional modification to paragraph 10.26 to address this representation (M61).	dwelling – 5.4 bedspaces
Taylor Wimpey	Taylor Wimpey	Taylor Wimpey	PD3807	Policy	NE3	Support						Supports the revisions to Policy NE3 and the supporting text which broadly align with the requested changes which were submitted as part of our responses to Draft CSDP, and Policy E8 (as it was then referenced).	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Katie	Sully	Siglion	PD3033	Policy	NE4	Support with mods			The policy should be amended to place a stronger focus on the encouragement of delivering greenspace on sites for development where possible and practicable to do so and how any new greenspaces contribute and enhance existing facilities in the neighbourhood. Flexibility in the supporting paragraphs is also required so that SUDS can form part of the greenspace provision.			The policy should be amended to place a stronger focus on the encouragement of delivering greenspace on sites for development where possible and practicable to do so and how any new greenspaces contribute and enhance existing facilities in the neighbourhood. Flexibility in the supporting paragraphs is also required so that SUDS can form part of the greenspace provision.	The policy should be amended to place a stronger focus on the encouragement of delivering greenspace on sites for development where possible and practicable to do so and how any new greenspaces contribute and enhance existing facilities in the neighbourhood. Flexibility in the supporting paragraphs is also required so that SUDS can form part of the greenspace provision.	These matters are discussed and explained in detail in the Natural Environment Compliance Statement (see Policy NE4). The Council considers that the policy allows for necessary flexibility in greenspace approach, particularly when sites lie in areas with existing high levels of greenspace quantity, and off-site provision or contributions may be deemed more appropriate to enable quality improvements to existing greenspace to take place. Further background detail regarding local area requirements is provided in the 2018 Greenspace Audit and Report and is not considered to be appropriate detail within the CSDP. These proposed alterations are therefore not supported by the Council.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1195	Policy	NE4	Support						There is no consideration in this Policy or, as far as we can see, elsewhere in the Plan, to Local Green Space as defined in the NPPF when designated in a Neighbourhood Plan. This should be addressed in the Core Strategy.	Local Green Space needs to be addressed either in this Policy or elsewhere in the Strategy.	As the policy sets out, greenspace provision will be protected, conserved and enhanced, and any impact on greenspaces from proposed development will need to consider, amongst other things, the quality and local value of a greenspace site. This approach enables a more balanced and thorough investigation to be undertaken when assessing a site's special quality or local community significance, as opposed to designation of Local Green Spaces, which may only apply to a limited number of sites. The Allocations & Designations Plan will designate greenspaces.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4149	Policy	NE4	Object						Welcome the added flexibility via the provisions of point	Paragraph 10.25 should be amended so that grass verges	The Council considers that the provision within the policy relates to the provision of "amenity	Three bedroom dwelling – 5.4 bedspaces

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											3ii.Object to Paragraph 10.25 and consider that green verges should be included within the calculation. The Planning Obligations SPD should make clear how the contribution sought will be calculated for improvements to greenspace. Consider that the bedspace figures used in Paragraph 10.26 are too high and that average occupancy rates should be used.	are included in the calculation. Greater clarity should be provided in the Planning Obligations SPD on how improvements to existing greenspace will be calculated. The bedspace requirements should be removed from Paragraph 10.26 and replaced by an average occupancy figure similar to Durham Council's of 2.4.	greenspace", rather than natural greenspace, which neither conventional grass verges nor SUDs would normally provide. Furthermore, the Council reiterates that paragraph 10.25 refers to "heavily engineered SUDs" to not be included within the calculation, so does not necessarily discount all forms of SUDs from the calculation. The Council's ultimate aim is to ensure that developments come forward that provide amenity greenspace that local residents can use, enjoy and appreciate, greenspace that helps to support and encourage physical and healthy lifestyles, rather than provision that is limited to greenspace and bluespace provision that is primarily there to support physical road and flood infrastructure. The Council considers that the approach in Policy NE4 and paragraph 10.26 is realistic. Furthermore, if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare/1000 population rate to be applied" the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. The Council does, however, acknowledge that paragraph 10.26 includes a table that shows three bedroom dwellings equating to 5 bedspaces. This has been raised as an incorrect assumption by developers. The Council propose an additional modification to paragraph 10.26 to address this representation (M61).	
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2699	Policy	NE4	Support with mods					Consider that grass verges, green lined roads and SUDs do constitute natural and semi-natural green space as listed in Para 10.23, therefore 10.25 should be amended to delete reference to these not being included in green space calculations. Consider that the number of bedspaces in Para 10.26 is too high and that an average occupancy rate per dwelling should be used.	Amend Paragraph 10.25 to remove reference to greenspaces being publicly useable and available and reference to grass verged etc. not being included in calculation. Delete table in Paragraph 10.26 and replace with average occupancy rate of 2.4 people per dwelling.	The Council considers that the provision within the policy relates to the provision of "amenity greenspace", rather than natural greenspace, which neither conventional grass verges nor SUDs would normally provide. Furthermore, the Council reiterates that paragraph 10.25 refers to "heavily engineered SUDs" to not be included within the calculation, so does not necessarily discount all forms of SUDs from the calculation. The Council's ultimate aim is to ensure that developments come forward that provide amenity greenspace that local residents can use, enjoy and appreciate, greenspace that helps to support and encourage physical and healthy lifestyles, rather than provision that is limited to greenspace and bluespace provision that is primarily there to support physical road and flood infrastructure. The Council considers that the approach in Policy NE4 and paragraph 10.26 is realistic. Furthermore, if developers advocate use of the County Durham methodology, the Council would need not only to adopt the household occupancy rate but also significantly raise the hectare/1000 population rate to be applied" the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. The Council does, however, acknowledge that paragraph 10.26 includes a table that shows three bedroom dwellings equating to 5 bedspaces. This has been raised as an incorrect assumption by developers. The Council propose an additional modification to paragraph 10.26 to address this representation (M61).	Three bedroom dwelling – 5.4 bedspaces
Alan	Hutchinson		PD2053	Policy	NE6	Object		Agrees that there are exceptional circumstances to amend the Green Belt but disagrees with the exclusion of Glebe House Farm as an HGA site (having been supported as such a site in 2017)		Agrees that there are exceptional circumstances to amend the Green Belt but disagrees with the exclusion of Glebe House Farm as an HGA site (having been supported as such a site in 2017)	Agrees that there are exceptional circumstances to amend the Green Belt but disagrees with the exclusion of Glebe House Farm as an HGA site (having been supported as such a site in 2017)	Remove land at Glebe House Farm from the Green Belt and reinstate it as a housing growth area to deliver approximately 55 new homes.	The site is not supported by the Council because the potential amenity impacts from adjacent businesses on Pattinson Industrial Estate were deemed to be fundamental to the site's suitability for residential development and would affect business viability. In particular, the viability of existing businesses may be compromised if	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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								and state that this exclusion has not been justified. The site performs poorly against Green Belt purpose and the site provides strong defensible boundaries.		and state that this exclusion has not been justified. The site performs poorly against Green Belt purpose and the site provides strong defensible boundaries.	and state that this exclusion has not been justified. The site performs poorly against Green Belt purpose and the site provides strong defensible boundaries.		complaints are received in the future relating to operational noise, dust and traffic, resulting from residential property being located on this site. One business in question made representations to the Draft Plan which indicated that they were planning to expand their operations (including 24 hour operation), and were concerned that this future expansion would not be feasible with residential development in such close proximity. This business already has more than 100 vehicle movements per day (many HGV's) and deals with wood recycling which is controlled under a waste management licence. Pattinson South Industrial Estate, which is adjacent to the site, is a Primary Employment Area, and together with the impacts identified through consultation and the conclusions of the Green Belt Boundary Assessment that state that no boundary alterations are justified in this locality (P29-30), it was concluded that the site should no longer be supported.	
Steve, Adamson, PD7670 Jill, Adamson, PD7672 Florence, Alcock, PD8058 Olwyn, Alder, PD8042 Florence, Allen, PD7967 Lucy, Allison, PD7530 Pauline, Allun, PD8147 Christine, Appleton, PD7674 Suzanne, Armstrong, PD7627 Neil, Armstrong, PD7622 Donna, Armstrong, PD7963 Lisa, Arthur, PD7630 Vera, Atkinson, PD7633 Alan, Baker, PD7488 Jean, Baster, PD7757 Colin, Bell, PD7615 Susan, Bell, PD7763 Vicky, Bennett, PD7766 Stephanie, Berridge, PD7754 Michelle, Berridge, PD7768 Richard, Berridge, PD7778 Paul, Berridge, PD7769 Patricia, Bewick, PD7758 Geoff, Blight, PD8006 Peter, Bond, PD7750 Trevor, Brewis, PD7369 Ann, Broomfield, PD7746 Gordon, Brown, PD7654 Joanna, Brown, PD7726 Cheralyn, Brown, PD7980 Margaret, Buckingham, PD7728 John, Buckingham, PD7960 Nicola, Buglass, PD7975 Christine, Burton, PD7730 Joe, Carter, PD7733 Lynn, Cave, PD7898 Kay, Clark, PD7559 Carole, Cleminson, PD7540 Bridget, Cockburn, PD7741 Philip, Cockburn (Snr), PD7686 Edith, Conley, PD7389 Vicki, Cook, PD7954 Leanne, Cowell, PD7896 Marjorie, Coxon, PD7690 Elaine, Cresswell, PD7961 Paul, Crompton, PD7697 Elizabeth, Cuddihy, PD8064 Martin, Cummings, PD7703 Eric, Curtis, PD7718 Lesley, Daley, PD7843 Ken, Davies, PD8060 Barbara, Davis, PD7856 Ian, Davison, PD8016 Claire, Deary, PD7496 Tracey, Dembry, PD7434 Steven, Dembry, PD7959 Marilyn, Ditchfield, PD7409 Danielle, Dixon, PD7997 Sharon, Donnigan, PD8063 Anne, Downs, PD7467 Jean, Drysdale, PD7393 Marsha, Drysdale, PD7401 Kenneth, Drysdale, PD7895 Kevin, Drysdale, PD8096 Jemima, Drysdale, PD8097 Jason, Duddin, PD7514 Janice, Duncan, PD7552 Les, Eccles, PD7436 John, Farrer, PD7688 Susan, Farrer, PD7979 Alan, Fenwick, PD8008 Jason, Fielder, PD7853 Enid, Finley, PD7499 Pauline, Fitzsimon, PD7605,			Policy	NE6	Object	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy			The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	Site HGA7 should be removed from the Plan and Policies Map	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in Compliance Statement. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Lorna, Flannigan, PD7851, Rebecca, Forrest, PD7849, Jill, Forster, PD7408, Brenda, Foster, PD7978, Joanne, Gair, PD7624, Juliet, Gaughan, PD7976, Gill, Gibson, PD7835, Linda, Gibson, PD7823, John, Gibson, PD7831, Andrew, Gibson, PD7841, Gemma, Gibson, PD7838, Steven, Goldsmith, PD7642, Terry, Goldsmith, PD8009, April, Gooch, PD7418, Robert, Goodwin, PD7805, Ashleigh, Goodwin, PD7857, Julie, Grant, PD7706, Julie, Green, PD7390, Raymond, Green, PD7613, Sarah, Green, PD7638, David, Halls, PD7598, Robert, Hampton, PD7565, Vivien, Hardy, PD7471, Nicholas, Hardy, PD7473, David, Harewood, PD7581, Mark, Harvey, PD7966, Jack, Harvey, PD7986, Karen, Harvey, PD7985, Penny, Hayton, PD7521, Colleen, Hedley, PD7962, Dean, Henson, PD7859, Jane, Hepworth, PD7503, Lesley, Hickman, PD7970, Katie, Hickman, PD7972, Benjamin, Higgins, PD7808, David, Hirst, PD8509, Claire, Hoggeth, PD7812, Bethany, Horn, PD7445, Gayle, Houghton, PD7592, Margaret, Hudson, PD7814, Daniel, Hudson, PD7818, Ronnie, Huggins, PD7958, Azia, Huggins, PD7957, Jessica, Hunter, PD7781, Bernard, Huscroft, PD7527, Lorraine, Irwin, PD7983, Maureen, Jobling, PD7790, Sandra, Johnson, PD7462, Louise, Jones, PD7535, Anne, Jones, PD7532, Lucy, Jones, PD7665, Gabriele, Jones, PD7793, Anne-Marie, Kabongo, PD7796, Kadria, Kassim, PD7804, Chris, Kelly, PD7965, Julie, Kibble, PD8082, David, Kibble, PD8086, Dave, King, PD7799, Val, King, PD7879, Olivia, Knowles, PD7884, Ena, Lang, PD8029, Phillip, Laws, PD7422, Barry, Laydon, PD7417, Jackie, Laydon, PD7617, Alan, Liddle, PD7394, Margaret, Liddle, PD7888, Phillip, Lloyd Robertson, PD7993, W Anthony, Long, PD7892, Jean, Lucas, PD7899, Kathy, Lyttle, PD7909, Catherine, Malloy, PD7855, David, Markham, PD7432, Marylyn, McCluskey, PD7865, Gillian, McCrudden, PD7870, Eileen, McDonald, PD7873, June, McDonough, PD8047, Moirá, McGinley, PD7848, William, McGinley, PD7900, Marc, McKinley, PD7872, Urszula, McLean, PD7858, Ciaran, McNally, PD7579, Lee, McVittie, PD7901, Gordon, Merry, PD7543, Janet, Merry, PD7695, Edward, Miller, PD7607, Diane, Miller, PD7610, Robin, Miller, PD7891, Christine, Miller, PD7893, Anne, Millward, PD7569, Julie, Milner, PD7955, Saeid, Mohammadi, PD7675, Nora, Morris, PD7903, Emma, Murray, PD7906, Astride, Ntumba, PD7908, Victoria, Odumade, PD7847, Pauline, O'Wellen, PD7964, Ann, Owen, PD7863, Jean, Oxberry, PD7897, Deborah, Paramos, PD8027, Ruth, Patterson, PD7410, Declon, Pattinson, PD7987, Karen, Pattison, PD7491,														

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Jamie, Peer, PD7877, Debbie, Peer, PD7885, Gerry, Pollock, PD7546, Tracey, Potter, PD7982, Dean, Prater, PD7426, Rachel, Prescott, PD7968, B, Pringle, PD7876, Sarah, Purdy, PD7327, Jordan, Purvis, PD7444, Tim, Purvis, PD7574, Lilian, Reid, PD8015, Ellie, Rice, PD7387, Darren, Rich, PD8087, Emme, Richardson, PD7537, Emily, Richardson, PD7875, Louise, Richardson, PD7866, Glen, Richardson, PD7950, Angelina, Richardson, PD7951, Paula, Richardson, PD7953, Maria, Robb, PD8026, Allan, Robe, PD7414, Angela, Roberts, PD7415, Lyndsey, Robertson, PD8046, David, Robinson, PD7366, Ann, Robinson, PD7384, Jaqueline, Robinson, PD7538, Emma, Robson, PD7621, Kathleen, Robson, PD7645, Susan, Rowe, PD7952, Jean, Rudd, PD7949, Damien, Sartid-Zadeh, PD7681, Christine, Scouler, PD7600, Irene, Scratcher, PD7971, Robert, Seaman, PD7412, Claire, Simpson, PD7948, Margaret, Smith, PD8043, Ian, Snape, PD8028, Ross, Snell, PD7984, Charlene, Spence, PD7658, Denise, Spence, PD7862, Robert, Stamp, PD7947, Jane, Steven, PD7937, Julie, Steven, PD7943, Jamie, Storey, PD7494, Lynn, Straughan, PD7492, Edmund, Surtees, PD7529, Kimberley, Surtees, PD7939, David, Surtees, PD7941, Dane, Surtees, PD7956, Hazel, Surtees, PD7969, Logan, Surtees, PD7974, Margaret, Swinhoe, PD7594, Colin, Swinhoe, PD7596, Rebecca, Taylor, PD7526, Malcolm, Templeton, PD7420, Lisa, Todd, PD7935, Robert, Tully, PD7567, Angela, Turner, PD7699, Laura, Umpleby, PD7701, Ben, Waites, PD659, Charlotte, Waites, PD7973, B, Wake, PD7933, Lisa, Walker, PD7934, Ann, Wallace, PD8025, James, Wallace, PD7927, Paul, Weites, PD7925, Robert, Welsh, PD7693, Sarah Louise, Wheat, PD7923, Emily, Whitmore, PD7578, Helen, Whitmore, PD7912, Jackie, Whitmore, PD7916, Linda, Whitmore, PD8004, Sarah, Whitmore, PD8005, David, Whitmore, PD8044, Stephen, Whitmore, PD7704, Sharon, Wildgoose, PD7981, Michelle, Williams, PD7524, Robert, Wilson, PD7376, Donna, Wilson, PD7315, Karen, Wilson, PD7373, Pauline, Wilson, PD7995, Paul, Wilson, PD8061, Joyce, Wilson, PD8098, Nick, Wilson, PD8081, Denny, Wilson, PD8225, Karen, Winter, PD7918, Erika, Wood, PD7977, Jo-Ellen, Worrall, PD7920, Kathryn, Worrall, PD7921,															
Given Name, Family Name, ID Alison, Stoddart, PD5242 Brenda, Wilson, PD6020 Suzie, Kaszefko, PD4892 Anisha, Kaur, PD3456 Lesley, Godfrey, PD5278 Kate, Gregory, PD5531 Ben, Gregory, PD5595 Ann, Dinning, PD5153 Cliff, Fothergill, PD4640 Richard, Curtis, PD5699 Kristan, Brown, PD5670				Policy	NE6	Object	Object to this policy on the grounds that the purposes of Green belt cannot be delivered if land at Springwell is removed from the Green Belt. Development on the Green Belt at Springwell would result in sprawl, loss	Object to this policy on the grounds that the purposes of Green belt cannot be delivered if land at Springwell is removed from the Green Belt. Development on the Green Belt at Springwell would result in sprawl, loss	Object to this policy on the grounds that the purposes of Green belt cannot be delivered if land at Springwell is removed from the Green Belt. Development on the Green Belt at Springwell would result in sprawl, loss	Object to this policy on the grounds that the purposes of Green belt cannot be delivered if land at Springwell is removed from the Green Belt. Development on the Green Belt at Springwell would result in sprawl, loss	Object to this policy on the grounds that the purposes of Green belt cannot be delivered if land at Springwell is removed from the Green Belt. Development on the Green Belt at Springwell would result in sprawl, loss	No proposed modification	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. As the Council is submitting its Plan under the NPPF transitional arrangements it is not	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Sheila, Nuttall, PD3269 Nikki, Boyle, PD2935 K, Wilkinson, PD709 Callum, Hills, PD2292 Matthew, Stubbs, PD4064 Amie, Robinson, PD4303 Stuart, Harding, PD2447 Vera, Carr, PD1856 Christopher, Lane, PD4920 Debbie, Oliver, PD5310 Vivienne, Lee, PD4093 David, Watson, PD6016 Kathleen, Burns, PD995 Gavin, Johnson, PD5026 Jon, Quine, PD5217 Emma, Gatens, PD1682 Emma, Hardy, PD2675 Gary, Bunt, PD5319 Deborah, Gallagher, PD1130 Mark, Gatens, PD1644 Susanne, Miller, PD1602 James, Gatens, PD2364 Lilian, Blue, PD1299 John, Bell, PD3138 Sheila, Bell, PD3132 Martin, Terry, PD5752 Kathryn, Tew, PD3352 Peter, Beal, PD4952 Peter, Lynn, PD1394 Lucy, Williams, PD4060 Edward, Failes, PD1303 Amelia, Hudson, PD3070 Jayne, Steanson, PD4648 Maureen, Watson, PD4835 A, Askew, PD2532 A, Askew, PD2579 Barry, Taylor, PD3367 Nicola, Hurst, PD1779 Wendy, Lindsay, PD4182 Lynn, Hartridge, PD3619 Gwynneth, McIntyre, PD3272 Kevin, O'Sullivan, PD597 Elizabeth, O'Sullivan, PD591 Delice V, Thompson, PD1901 R, Patterson, PD1549 Anna, Steanson, PD4504 Ruth, Robinson, PD3993 Clare, Wood, PD4013 Olivia, Steanson, PD4594 Mark, Steanson, PD4587 Dale Royce, Wood, PD5523 Denise, Hannan, PD523 Marjorie, Stephenson, PD3958 William James, Ward, PD986 Christina, Ward, PD3008 Margaret, Haywood, PD5086 Margaret, Copeland, PD2941 John, Turnbull, PD5933 Clare, Turnbull, PD830 M, Lewins, PD4805 William, Evans, PD5509 R W, Chilton, PD3831 Gordon, Taylor, PD3626 Ben, Taylor, PD3652 Joan, Chilton, PD3885 D, Mulholland, PD1671 Michael, Wales, PD4444 G, Taylor, PD804 B, Taylor, PD790 Maureen, Robinson, PD4589 Keith, Robinson, PD4507 R, Hillier, PD1117 Alistair, Amour, PD5359 Joan, Armstrong, PD4748 E, Henderson, PD3347 P, Gale, PD5998 M E, Glaister, PD2399 Maureen, Failes, PD1453 Joan, Ashman, PD2984 E, Fife, PD4876 Amy, Fife, PD4915 Grahame, Fife, PD4916 L, Potter, PD3093 S, Potter, PD3112 George, Anderson, PD3154 Caroline, Anderson, PD3197 Frances, Cowie, PD2867 A, Stevens, PD2015 E, Irwin, PD2450 M, Dawson, PD2998 D, Wilkinson, PD724 Lewis, Tuff, PD4615 J, Forster, PD2503 S, Oliver, PD3031 Elizabeth, Oliver, PD3025 Alison Jane, Logan, PD5827 Stuart, Logan, PD5697 James Donnison, Fletcher, PD1167 Neil, Foggin, PD4817 J D, Cullen, PD3326 P W, Cullen, PD3297 P J, Cullen, PD2558						of countryside, merging of settlement, discourage development on brownfield land, and would not preserve the setting and special character of Springwell Village.	of countryside, merging of settlement, discourage development on brownfield land, and would not preserve the setting and special character of Springwell Village.			of countryside, merging of settlement, discourage development on brownfield land, and would not preserve the setting and special character of Springwell Village.	of countryside, merging of settlement, discourage development on brownfield land, and would not preserve the setting and special character of Springwell Village.			considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.

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Carole, Vorley, PD800 Annabel, Logan, PD5654 Robin, Ritzema, PD3411 T, McCartney, PD5297 D E, McCartney, PD5266 M, Corrigan, PD2046 Ava, Anderson, PD3136 George Noah, Anderson, PD3176 M, Burrows, PD2908 Kenneth, Brunger, PD2084 K, Faulkner, PD2701 N J, Faulkner, PD2722 Paul, Appleton, PD5869 K H, Appleton, PD4136 Susan, Booker, PD1585 Steven, McGill, PD4051 Karen, McGill, PD4005 Lee, McGill, PD3705 Craig, McGill, PD4080 Mary, Cartwright, PD1601 Alan, Coleclough, PD5121 Xenia, Webster, PD1802 Robert, Johnson, PD5775 Carole, Stephenson, PD1899 Dorothy M, Coleclough, PD3579 Lisa, Harris, PD3576 Ian, Harris, PD3577 Lucy, Rouse, PD1927 Edith, Morris, PD4085 T, Scott, PD5610 M, Scott, PD5763 John, Trewitt, PD4894 M, Trewitt, PD1718 W, Carrick, PD3219 M, Parkin, PD3214 C, Nelson, PD5353 M, Wood, PD948 Alan, Dinning, PD5031 A M, Bradford, PD2594 T E, Bradford, PD2582 A, Clements, PD2757 N D, Clements, PD2686 J H, Turnbull, PD1674 A E, McKeon, PD4874 J, McKeon, PD4875 D, Flinn, PD5992 C A, Flinn, PD5962 John, Young, PD5117 Jean, Mulholland, PD1721 James, Mulholland, PD1700 Maureen, Whittaker, PD1020 D, Whitfield, PD1466 F, Whitfield, PD1452 Ada, Carr, PD4527 R A, White, PD1118 Ann, White, PD1131 Ronnie, Senior, PD1604 Betty, Senior, PD1605 Carl, Williams, PD4714 L, Williams, PD4541 H, Watson, PD1168 J, Watson, PD1081 C, Meek, PD2086 D, Meek, PD1218 I, Bell, PD5403 Donna, Bishop, PD871 Christopher, Bishop, PD907 I, Metcalf, PD2942 Richard, Lumsdon, PD5568 Gemma, Lumsdon, PD5537 Wendy, Ramsey, PD645 O, Fletcher, PD1034 Maureen, Morrow, PD1014 Audrey, Miller, PD1048 Lee, Williams, PD919 John, Nesbitt, PD1235 Helen, Weir, PD4125 David, Weir, PD4100 M, Freeman, PD1926 Robert, Jackson, PD4448 John, Dowson, PD4278 Brenda, Foote, PD3902 Doreen, Smith, PD1804 M, Livingstone, PD2607 Grahame, Parker, PD1003 Catherine, Parker, PD1306 Keith, Parker, PD8520 Wendy, Black, PD5773 R, Florance, PD1459 Heather, Florance, PD5808 I, Dalby, PD1374 T, Dalby, PD1564 W A, Pattison, PD1818 P, Aitken, PD1499 K, Aitken, PD865 Dennis, Lambton, PD5189 James, Ewing, PD4381 Norma, Houghton, PD3220 P, Weatherburn, PD3906 S M, Holt, PD1304 Malcolm, McArthur, PD965 Margaret, McArthur, PD317														

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Ingrid, Chidgey, PD400														
Kevin, Sheppard, PD2026														
Carol, Lynn, PD1433														
David, Horrigan, PD2982														
Sarah, Horrigan, PD2820														
Jane, Horrigan, PD2819														
Keith, Horrigan, PD2983														
J, Wood, PD2509														
M A, Jennings, PD1902														
Joan, Pearson, PD3325														
Frank, Blue, PD4744														
Stella, Jacques, PD655														
G, Chicken, PD2877														
Vicky, Adgar, PD4901														
L, Rae, PD636														
D, Rae, PD5371														
Dan, Banning, PD2676														
Matt, Banning, PD2531														
Steve C, Templeman, PD4540														
Angela, Hardy, PD2448														
K, Pickup, PD5497														
Linda, Cryan, PD1107														
N, Potter, PD5567														
Terry, Firman, PD1083														
William, Portsmouth, PD5746														
F J, Thirlaway, PD2381														
I, Thirlaway, PD2382														
Eric, Oliver, PD2980														
Gwenyth, Oliver, PD2959														
Richard, Miller, PD3975														
Neil, Waite, PD4816														
Janine, Edworthy, PD3207														
Ian, Edworthy, PD5285														
Greg, Skeoch, PD5680														
Michael, Harding, PD5288														
Kelly, Dryden, PD3582														
Antony, Dryden, PD3760														
Angela, Bell, PD1861														
John, Donnison, PD4943														
Kevin, Boyd, PD4931														
Katherine, Brown, PD2873														
Greg, McPeake, PD578														
Lynn, McInnes, PD4445														
Jacqueline, Mccaffrey, PD4964														
Lisa, Reid, PD1365														
Tim, Mount, PD1332														
Victoria, Clayton, PD2156														
Joe, Devannee, PD452														
Kate, Robinson, PD1969														
Rachael, Rodger, PD2039														
Claire, Treadwell, PD3860														
Peter, Cottle, PD4942														
Pauline, Fenwick, PD954														
Melissa, Oliver, PD3393														
Alison, Nesbitt, PD2726														
David, Cooper, PD2157														
Lyn, Laws, PD3490														
Edna, Bell, PD4418														
Nicci, Best, PD1678														
Jess, Illingworth, PD2631														
Colin, Murison, PD3789														
Gary, Yeaman, PD4443														
Brian, Rowntree, PD3757														
Eileen, West, PD2899														
Amy, Marshall, PD1568														
Jeremy, Thomas, PD1132														
Steve, Thomas, PD3532														
Janice, Holmes, PD4591														
Sarah, Jordison, PD4041														
Karen, Pooley, PD5378														
Sarah, Gough, PD3751														
Thomas, Williams, PD2158														
Philip, Greenup, PD1967														
K, Reay, PD1567														
Catherine, Greenup, PD1968														
Malcolm, Brown, PD4164														
Laurence, Reay, PD975														
Madeleine, Scott-Gray, PD2625														
June, Simpson, PD3667														
Clem, Armstrong, PD2125														
Allen, Hartridge, PD1756														
Dianne, Tully, PD4059														
Sue, Murdy, PD5272														
David, Pickup, PD5591														
Jim, Pearson, PD3489														
Colin, Fenwick, PD1057														
Rachel, Chadwick, PD1300														
Anne, Rennie, PD663														
Michael, Rennie, PD668														
Laura, Condren, PD5426														
Nicola, Cowie, PD1166														
Carl John, Grant, PD503														
Sally, Best, PD1075														
Amelia, Bateman, PD334														
Deborah, Bateman, PD346														
Rachel, Luke, PD3708														
Katrina, Garnett, PD3762														
E. Joan, Miller, PD5019														
Alma, Jobling, PD3523														
Terry, Brereton, PD2148														
Tony, Kelly, PD5184														
Nicola, Wyld, PD2866														

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Nigel, Hems, PD4713 Norma, McBride, PD1522 Thomas, McBride, PD3150 Claire, Kelly, PD1734 Philip, Higgins, PD4838 Paul, Balmer, PD1725 Tracy, Balmer, PD1724 Robert, Best, PD3068 Scott, Nesbitt, PD2728 Yvonne, Robson, PD4309 Adam, Barnes, PD5215 Ruth, Hirst, PD4717 Alan, Bell, PD4405 Anna, Dalby, PD4115 Niamh, Cowie, PD935 Lindsey, Mulholland, PD1723 Ronan, Kenny, PD2580 Amanda, Barron, PD4645 Richard, Littlejohn, PD4745 Sheila, Barron, PD4644 Stephen, Hudson, PD3631 Elisabeth, Brereton, PD2030 Keith, Cameron, PD3337 Michelle, Sweeney, PD772 Sara, Williams, PD929 Andrew, Hartley, PD3476 Wendy, Hewitson, PD3426 Paul, Harris, PD2115 Mark, Weddle, PD914 Paul, Aldridge, PD3447 Valerie, Hancock, PD2408 Mildred, Brodie, PD2446 ARTHUR, BRODIE, PD2432 Paul, Ehrhardt, PD2314 Linda, Ritzema, PD3409 Maxine, Thornley, PD5347 Linda, Barron, PD4739 Emma, Turnbull, PD2538 Joan, Evans, PD2563 Malcolm, Richardson, PD1620 Christopher, Parker, PD5205 Katie, Parker, PD5847 John, Bateman, PD2649 Jean, Bateman, PD2648 Dorothy, Robson, PD2316 Stuart, Griffiths, PD4334 Callum, Robinson, PD5199 Hannah, Robinson, PD4806 Nicole, Robinson, PD5417 Lucy, Griffiths, PD4542 David, McCaffrey, PD4980 Robert, Charlton, PD4801 Mark R, Fife, PD2485 John, Gallagher, PD2225 Lucy, Woolley, PD2673 Joss, Savory, PD3146 Mark William, Portsmouth, PD5753 Paul, Nelson, PD1862 Matthew, Brown, PD2852 Alexandra, Brown, PD2914 E.D, Pattison, PD1817 Olivia, Yeaman, PD5223 Miley, Yeaman, PD4332 Angela, Savory, PD3177 E, Hillier, PD3324 Colin, Clark, PD2398 Philip, Ritzema, PD4506 Kelly, Smith, PD6189 Jordan, Smith, PD6162 H M, Bechkok, PD2444 James, Warne, PD3323 Lynne, Warne, PD2876 Deborah, Clayton, PD1859 Evelyn, Cooper, PD1713 Ian, Clayton, PD2196 A H, Pearce, PD3363 David, Ingram, PD4029 Sue, Ingram, PD4009 Lynn, Clayton, PD2101 Joan, Slowther, PD4715 Kenneth, Slowther, PD5969 Simon, Reay, PD957 Jake, Hannan, PD1939 Peter, Cartwright, PD1490 Rachel, Nelson, PD1782 Stephen, Houghton, PD1743 L, Jobling, PD1105 D, Jobling, PD1092 W, Jacques, PD2608 George Edward, Alberts, PD3327 G, Mullen, PD2818 J G, Mullen, PD2755 Charlie, Rouse, PD1988 P, Sweeney, PD1233 Elizabeth, Martin, PD3162 Maureen, Hamilton, PD1367 Anna Marie, Harris, PD3575 W, Lewins, PD4807 Mavis, Johnson, PD2687 George, Parkin, PD3213 George, Simpson, PD4671 Debbie, Simpson, PD4673														

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Colin, Gransbury, PD2223 E, Barrass, PD326 Bill, Dick, PD457 Christine, Dick, PD463 M, Barrass, PD330 Elsie, Foster, PD3815 Maureen, Turnbull, PD1672 Heather, Thornley, PD5445 Alex, Thornley, PD5543 Ciaran, Wood, PD3890 Madaleine, Wood, PD3870 Steven, Brown, PD2830 Elaine, Hamilton, PD1366 Andrew D, Bosworth, PD341 Peter, Burns, PD3368 Craig, Reid, PD5043 Graeme, Miller, PD1754 Howard, Booker, PD1566 Katrina, Ridley, PD695 Malcolm, Weatherburn, PD4498 George, Black, PD2145 Maureen, Monaghan, PD1757 Ron, Monaghan, PD2181 Linsey, Taylor, PD3568 G, Wilkinson, PD2765 M, Wood, PD3715 Sheila, Platt, PD3853 Sandra, Foggin, PD2262 Judith, Platt, PD2379 DW, Foggin, PD2224 Jeffrey, Platt, PD3881 Karen, Hills, PD3086 Kenneth, Hills, PD3248 Michael, Hills, PD2106 Beth, Lawrence, PD2069 Elizabeth, Myers, PD2241 George, Myers, PD2085 Kasia, Heywood, PD2242 Iris, Myers, PD1296 Allen, Hope, PD1254 Ryan, Hope, PD2647 Andrea, Hope, PD5524 Helen, Quinn, PD2868 Robert, Quinn, PD2759 Leanne, Tiffen, PD2997 Dianne, Ellwood, PD3135 Brian, Morrissey, PD2709 Irene, Searle, PD818 G, Burn, PD4426 F, Burn, PD4501 Eva, Tiffen, PD1068 Alan, Tiffen, PD1039 Maria, Clark, PD2484 AM, Bechkok, PD2464 Deborah, Swaddle, PD930 Rachel, Nesbitt, PD1442 Ian, Ramsay, PD3674 CH, Wood, PD1104 Michelle, Bland, PD2102 Simon, Bland, PD3221 John, Smith, PD1415 Joan, Smith, PD1612 Ron, Codling, PD3778 BM, Codling, PD3518 William, Cooper, PD3448 Carolyn J, Cooper, PD5352 Charlotte, Smith, PD3450 Daniel, Chadwick, PD1302 David, Leach, PD4574 Audrey, Leach, PD5814 S, Bell, PD3817 Steve, Bell, PD2821 Claire, Guy, PD4746 Daniel, McIntyre, PD3281 Jack, Thompson, PD4040 SA, Jones, PD5880 M, Turner, PD1430 Melanie, Craig, PD5812 Helen, Young, PD4913 Gemma, Venus, PD1412 Claire, McLean, PD3699 Martin, Venus, PD834 Angela, Bowe, PD3700 Dean, Craig, PD4799 Samantha, Carver, PD4227 Elizabeth, Hogg, PD4074 Michael, Hogg, PD5124 Elaine, Fothergill, PD4562 John, Robinson, PD2801 Maureen, Robinson, PD2803 Will, Robinson, PD2802 Amy, Falcus, PD3638 Joanne, Langley, PD5254 Deborah, Blackett, PD4983 David, Blackett, PD1487 Michelle, Wood, PD3412 Elizabeth, Murison, PD3816 Rhiannon, Holmes, PD4335 Trevor, Holmes, PD4337 Carly, Burnett, PD902 Keith, Burnett, PD4069 Sylvia, Williams, PD2841														

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Susan, Hall, PD1429, Claire, Richardson, PD974, Margaret, Hodgson, PD1364, Linda, Garnett, PD3057, Ronald, Garnett, PD2654, Dorrian, Affleck, PD2523, Marion, Coats, PD2412, Sarah, Horne, PD1610, Ray, Morris, PD1369, Andrew, Blackett, PD1301, Lynda, O'Leary, PD4954, Adam, Finch, PD4858, David, Langley, PD4844, Claire, McMillan, PD4751, Richard, Foreman, PD5226, Lee, Brebner, PD1940, Elizabeth, Collins, PD3067, David, Todd, PD4209, Nick, Best, PD3646, Coel, Dryden, PD3763, Rhys, Dryden, PD3911, Dan, Stokoe, PD3912, Emma, Blackett, PD3976, Jennifer, Boyd, PD4138, John, Nesbit, PD4058, Clare, Nesbit, PD4249, Gillian, Beal, PD4939, Aurora, Hartley-Hewitson, PD5749, Chris, Thomson, PD4854, Alice, Colligan, PD4823, Julie, Watson, PD4775, Laura, Watson, PD5488, Martin, Watson, PD5351, Bill, Holmes, PD5486, Dennis, Judge, PD5420, Jessica, Stafford, PD5197, P, Rudd, PD5095, M, Brooks, PD5078, Adam, Hall, PD5059, E, Adams, PD5058, Ann, Manning, PD5037, Dean, Derbyshire, PD5473, Chris, Shaftoe, PD5419, Zack, Langley, PD5418, Julie, Ridley, PD5316, Isabel, Franklin, PD5315, Fay, Blackie, PD5317, Sean, Klein, PD5525, Mark, Franklin, PD5147, Ian, Nelson, PD5150, T, Brown, PD5149, P, Nelson, PD5216, Nancy, Urwin, PD4454, John, Hancock, PD5200, Heather, Francios, PD4530, Stacie, Fothergill, PD4547, J T, Watson, PD4612, Kenneth, Francios, PD4581, Samantha, Potts, PD4618, Magdalena, Mazurek, PD4660, Deborah, Ewart, PD4656, Luke, Robson, PD5128, Kate, Ewart, PD5145, Kevin, Dunn, PD5104, Stephen, Ewart, PD4649, Eleanor, Ewart, PD5163, Daniel, Thompson, PD5003, Andrew, Thompson, PD5414, Claire, Thompson, PD5474, Alan, Barber, PD2197, Christopher, Reay, PD2264, Christine, Urwin, PD2386, Tom, Gallagher, PD2351, Graeme, Ridley, PD2294, Ray, Urwin, PD2321, Garry, Miller, PD2265, Stephen, Hall, PD4406, Roslyn, Hall, PD4437, Louise, Miller, PD4365, Stephanie, Mallam, PD4344, Catherine, Johnson, PD4290, Relia, Jonas, PD5971, Michelle, Aubert, PD4265, Pauline, Shaftoe, PD6049, Riley, Allen, PD4134, Pauline, Waite, PD6048, Jane, Robson, PD5805, Mary, Brown, PD6047, Michele, Llanaez, PD5959, Paris, Holland, PD5810, Margaret, Banks, PD6037, Dan, Llanaez, PD5071, Dale, Pilkington-Smith, PD1179, Brenda, Wilson, PD6015, Olivia, Llanaez, PD5070, Jacquelin, Foggin, PD4900, Brenda, Dodd, PD6036, Beth, Cullen, PD5118, E, Mitton, PD5069, Danielle, Llanaez, PD5009, Evan, Robinson, PD5008, Jeannette, Forrester, PD6035,														

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Amanda, Llanea, PD5006, Peter, Carr, PD4902, Joan, Liddle, PD3978, Morgan, Llanea, PD4743, Veronica, Watson, PD5903, Gregory, Kaszefko, PD4604, Rachel, Ray, PD5941, Olivia, Allen, PD4625, Gordon Alan, Robson, PD5938, Lyndsey, Robson, PD5937, Carrie Ann, Brooke-Lovell, PD5846, Victoria, Laws, PD4558, Will, Brooke Lovell, PD6010, D. Moore, PD5932, John, Jennings, PD5678, Evie, Brooke Lovell, PD6025, David, McClerence, PD5931, Rachel, Skeoch, PD5681, James, Ray, PD5848, Steven, Forster, PD5928, Zac, Gillbanks, PD5698, Ann Marie, Gillbanks, PD5583, Matty, Wild, PD5929, Katie, Langley, PD5927, SARAH, CURTIS, PD5633, Katie, Wilson, PD5925, Brett, McIntyre, PD5629, Samantha, Barker, PD4181, Laura, Williams, PD5700, Sandra, Barker, PD3957, Kenneth, Barker, PD4183, Josh, Grey, PD5484, Dawn, Gauld, PD4208, R, Neville, PD5581, Malcolm, Turnbull, PD4246, C, Neville, PD5631, Chris, Gibson, PD4248, E, Dodds, PD5415, Peter, Franklin, PD4037, Laura, Chambers, PD4286, Phillip, Williams, PD5011, Dave, Brown, PD4044, Alan, Oxley, PD3956, Caroline, Lane, PD4883, Eleanor, Williams, PD3861, Malachi, Payne, PD4821, Oliver, Wilson, PD4982, Michael, Payne, PD4762, Sarah, Charlton, PD4718, Theo, Drummond, PD4678, Deborah, Wilson, PD5639, Oliver, Drummond, PD4616, Sara, Coulson, PD4567, Thomas, Pickup, PD5575, Christine, Goss, PD4487, James, Wilson, PD5553, P Panther, PD5517, Alan, Stavers, PD4428, A, Barrett, PD5456, S, Wright, PD4357, Peter, Condren, PD5437, Gemma, Cooke, PD4291, Greg, Taylor, PD5398, Talia, Payne, PD4218, Tristan, Simpson, PD5868, Angela, Dover, PD5866, Keith, Dover, PD5863, T, Suchecki, PD5860, Kristopher, Drummond, PD5857, Helen, Brady, PD5994, Jacob, Ramshaw, PD5855, Rosie, Ramshaw, PD6001, Joanne, Ramshaw, PD5974, Keian, Pooley, PD5945, Danielle, Nesbitt, PD5898, William, Barker, PD5865, Tazmin, Pooley, PD5828, Ryan, Pooley, PD5785, Dillion, Pooley, PD5743, John, Pooley, PD5708, Susan, Brown, PD5622, Alison, Barnes, PD5762, Clifford, Murdy, PD5721, Brian, Dunn, PD5693, Denise, Dunn, PD5653, Jill, Waite, PD5624, S, Abrahams, PD5760, Ann, Barber, PD5731, Emily, McNulty, PD5716, Gillian, McNulty, PD5687, Sophie, McNulty, PD5658, Kevin, O'Neill, PD3635, Danielle, Yeoman, PD3818, James, Colledge, PD3088, Muriel, Colledge, PD3051, Tilly, Brady, PD3156, Stephen, Brady, PD3121, James, Ramshaw, PD3184, Paul, Hanson, PD3223, Louise, Hanson, PD3277, Annie, Loadman, PD3634, Louise, Lynn, PD3632,														

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Craig, Gartland, PD3932, Stephen, Woodbridge, PD3298, Paul, Burrows, PD2894, Jorja, Burrows, PD2947, Janette, Tiffen, PD2970, Terence, Tiffen, PD3037, Bridget, Edworthy, PD3048, Miranda, Edworthy, PD3258, Kimberly, Beckwith, PD3413, Mollie, Taylor, PD3436, Craig, Falcus, PD3525, David, Taylor, PD3541, Joshua, Taylor, PD3602, Peter, Jobling, PD4485, Daniel, Wales, PD4459, Patricia, Peele, PD3466, Caroline, Hills, PD3089, Donna, Jackson, PD4452, Barry, Wylde, PD3115, Peter, Watson, PD5475, Andy, Hird, PD3069, Joyce, Tetlow, PD5349, Jean, Taylor, PD5348, Michael, Caruana, PD4132, David, Higgins, PD3774, Pauline, Higgins, PD3748, Geoffrey, Higgins, PD3732, Stephen, Luke, PD3682, Lynn, Taylor, PD3661, Peter, Sterling, PD3545, Ravender, Gill, PD3519, Amer, Singh, PD3495, Surena, Kaur, PD3480, Paul, Routledge, PD3419, Dennis, Nuttall, PD3294, Shaun, McCaffery, PD2888, Kathleen, Carroll, PD2812, Imogen, Dalby, PD3872, S, McCaffery, PD2780, Helen, Wilkinson, PD2745, Melanie, Wilson, PD647, Amelia, Maxwell, PD762, Amanda, Wallace, PD750, J, Jeruskau, PD4298, Carol, Baggaley, PD737, T, Robson, PD4198, M, Wilkinson, PD692, Lynda, Sutton, PD4156, J, Wilkinson, PD679, Paul, Sutton, PD4150, Marley, Brady, PD3962, Dawn, Cooper, PD3245, Tarryn, Pooley, PD3938, K, Hepburn, PD3922, Margaret, Nesbitt, PD3215, Julie, Fife, PD2609, David, Brown, PD2483, Janet, Jamieson, PD2565, Norman, Jamieson, PD2564, Shauni, Pringle, PD2349, Margaret, Quinn, PD3501, Janice, Pringle, PD2344, Leslie, Trotter, PD2343, Naomi, Hartley, PD3451, Stephen, Fay, PD3836, PM, Miller, PD3998, Gemma, Henderson, PD3826, Frances, Bell, PD3796, Ann, McCulla, PD3727, Andrew, McCulla, PD3687, Michael, Harding, PD5286, Bill, Morrell, PD1455, Charlotte Elizabeth, Dalby, PD4121, Yvonne, Morrell, PD1454, Alexia, Reynolds, PD1376, Jorge, Reynolds, PD1375, Gillian, Reynolds, PD1226, Peter Alexander, Grant, PD5213, Anthony, Reynolds, PD1225, Amelia, Reynolds, PD1224, Patricia, Morris, PD1169, Leon, Morgan, PD1065, Marian, Morgan, PD1051, Jennifer, Boyd, PD944, Ann Mildred, Grant, PD2955, David, Morris, PD784, Ronald Malcolm, Grant, PD2878, Stephen, Reveley, PD777, Julie, Reveley, PD3148, Dorothy, Chandler, PD1938, Susan, Richardson, PD1656, Frank, Chandler, PD1903, Mark, Hannan, PD1816, J, Richardson, PD1638, Catherine, Bell, PD1780, Rebecca, Bradley, PD3701, Gary, Anderson, PD3406, Carolyne, Anderson, PD2261, Irene, Gransbury, PD2222, Darren, Tiffen, PD3761, Lindsey, Ross, PD2194, Erlinda, Ross, PD2195,														

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<p>Joanne, Lisgo, PD2414, Julie, Rodger, PD2038, Michelle, Hills, PD2350, David, Grady, PD3322, S. Rodger, PD2037, Gladys, Thompson, PD3149, James, Tracey, PD1974, Neil, Taylor, PD1965, Allan, Thompson, PD1738, Joyce, Taylor, PD1952, M. Clark, PD2754, R L, Cooper, PD3488, Maurice, Bryson, PD3777, Jean, Green, PD3522, Julie, Hall, PD2685, Fiona, Parker, PD2869, Gary, Cairns, PD2940, Elonor, Horne, PD2520, Mason, Shotton, PD2442, Janet, Regan, PD2372, Lisa, Kimber, PD2246, Alan, Milburn, PD3740, A, Dawson, PD6022, Denise, Milburn, PD1677, Joyce, Horne, PD1702, Gary, Horne, PD3486, Daniel, Moravanszky, PD2492, Hannah, Cowie, PD2479, Neil Edward, Cowie, PD2465, Sophie, Cleasby, PD2530, S. Garrett, PD2577, Gillien, Harris, PD1828, D. Garrett, PD1647, Kelly, Murray, PD1848, Patricia, Black, PD1873, Nicola, Rae, PD1890, Jonathan, Hall, PD1911, Mark, Jahn, PD2036, W, Ankers, PD2058, V, Morgan, PD8514, Erik, Murison, PD2144, Emily, Murison, PD2163, J, Murison, PD2176, M, Murison, PD4179, Daniel, Murison, PD4195, Janine, Forster, PD1583, Bethany, Murison, PD4216, Kathryn, Murison, PD4245, Steven, Sambers, PD4234, David, Woolley, PD2626, Robert, Bloomfield, PD4379, Sharon, Bloomfield, PD4407, Olive, Cook, PD2624, Julie, Giloney, PD4425, Diana, Kenny, PD1220, Jason, Sayers, PD4356, Anita, Smith, PD1267, Vicki, Edmunds, PD4333, Julie, Goding, PD4283, John, Smith, PD1305, Abbie, Langley, PD1333, Ronald, Ferguson, PD2147, Bryan, Scott, PD2244, Irene, Stoker, PD2263, H, Stoker, PD2322, Kenneth, Robson, PD2384, Sophie, Harding, PD2318, Peter, Mossop, PD1855, Rhoda, Mossop, PD1853, Millie, Rouse, PD1898, Callum, Aldridge, PD1989, Dominic, Aldridge, PD1987, Alison, Aldridge, PD2032, Gillian, McMahon, PD1477, Morris, Smith, PD1803, Kim, McBride, PD1531, J, Dodds, PD1655, David Alan, Fenwick, PD1297, Lynn, Fenwick, PD1339, Sam, Dinsley, PD1571, Susan, Dinsley, PD1548, Shaun, Dinsley, PD1523, Will, Langley, PD1377, Tom, Shaftoe, PD1505, Suzanne, Shaftoe, PD1507, Susan, Smith, PD1508, Jonathan, Dewart, PD2080, Adam, Harper, PD2231, Sharon, Robinson, PD8330, Marc, Hughes, PD8316, Susan, Patrick, PD8303, Jo, Thomas, PD8526,</p>														
Katie	Sully	Siglion	PD2865	Policy	NE6	Object				Brownfield sites in the Green Belt should be given the same level of weight as those which are in settlement areas, provided that they have been assessed as compliant with	Brownfield sites in the Green Belt should be given the same level of weight as those which are in settlement areas, provided that they have been assessed as compliant with	Consider promotion of brownfield sites for development within the Green Belt subject to compliance with other relevant policies in the Plan.	The Council states that it is not the role of the CSDP to repeat the NPPF, which provides detail regarding the use of previously developed land (brownfield land) within the Green Belt. No further change is therefore proposed to the policy or text.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are

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											other relevant policies.	other relevant policies.			proposed.
Mary P	Carruthers	Pawz for thought	PD276	Policy	NE6	Object		Considers the policy to be sound but raises concerns over the evidence base to remove site HGA7 North Hylton from the Green Belt.			Considers the policy to be sound but raises concerns over the evidence base to remove site HGA7 North Hylton from the Green Belt.	Considers the policy to be sound but raises concerns over the evidence base to remove site HGA7 North Hylton from the Green Belt.	No modifications proposed for this specific policy.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report, which is also supported by 3 documents: Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017), and; Green Belt Boundary Assessment and Recommendations (2018).The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018.The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification is set out within the Compliance Statement (see Policy SS4 regarding site HGA7 at North Hylton).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD112	Policy	NE6	Support					Historic England 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.	No modification proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Nick	Horsley	Mineral Products Association	PD4417	Policy	NE6	Support with mods					It would be helpful if Policy NE6 or the supporting text reflected the wording of the NPPF and made clear which types of development are not inappropriate in the Green Belt.	Amend Policy NE6 or the supporting text to make clear which types of development are not considered to be inappropriate in the Green Belt.	The Council states that it is not the role of the CSDP to repeat the NPPF, hence Paragraph 10.34 states that "national planning policy lists certain exceptions which are not inappropriate". No further change is therefore proposed to the policy or text.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Ray	Delaney		PD34	Policy	NE6	Object		Object to the words 'may be permitted' in criterion 3. It should be changed to 'will be permitted' to provide certainty.	Object to the words 'may be permitted' in criterion 3. It should be changed to 'will be permitted' to provide certainty.		Object to the words 'may be permitted' in criterion 3. It should be changed to 'will be permitted' to provide certainty.	Object to the words 'may be permitted' in criterion 3. It should be changed to 'will be permitted' to provide certainty.	Reword criterion 3 to 'will be permitted'.	The Council propose an additional modification to policy NE6.3 to address this representation (M62).	Development in the Green Belt may will be permitted where the proposals are consistent with the exception list in national policy subject to all other criteria being acceptable.
H	McCall		PD2583	Policy	NE6	Object		Objects to NE6-specifically there is a proposal to extend Green Belt and revise the Green Belt boundary so that it follows the existing urban boundary of West Herrington and the B1286.It is considered that the Council has not provided sufficient justification as to why the land is proposed for Green Belt designation. The site should be released for residential development, which would include existing Green Belt			Objects to NE6-specifically there is a proposal to extend Green Belt and revise the Green Belt boundary so that it follows the existing urban boundary of West Herrington and the B1286.It is considered that the Council has not provided sufficient justification as to why the land is proposed for Green Belt designation. The site should be released for residential development, which would include existing Green Belt	Green Belt should be amended to exclude the identified plot of land.	This land was subject to a recent planning application for housing. Counsel advice was sought to consider whether the site was inside or outside of the Green Belt. Counsel concluded that there had been a drawing error to the plan and that the site was indeed within the Green Belt. At appeal, the Planning Inspector agreed with the Council's planning refusal and duly dismissed the appeal.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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Debbie	Gates		PD312	Policy	NE6	Object		land too. Considers policy NE6 not to be positively prepared.	Considers policy NE6 not to be effective.		Considers policy NE6 not to be consistent with national policy as no need or evidence of exceptional circumstances for removing green belt.	land too. Considers policy NE6 not to be justified. There are areas of brownfield land and empty properties that could be used.	Build on brownfield sites and regenerate the city centre to boost the economy. Retain green areas and use empty properties.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
S	Gregson		PD1608	Policy	NE6	Object		Objects to Policy NE6 which is not sufficiently flexible, and fails to identify and safeguard sufficient areas of land in Green Belt for future development. Further sites should be identified and safeguarded to meet needs arising beyond the plan period, particularly since the Green Belt has not been reviewed for almost 30 years in the city. 176 hectares of land at Burdon should be safeguarded.	Objects to Policy NE6 which is not sufficiently flexible, and fails to identify and safeguard sufficient areas of land in Green Belt for future development. Further sites should be identified and safeguarded to meet needs arising beyond the plan period, particularly since the Green Belt has not been reviewed for almost 30 years in the city. 176 hectares of land at Burdon should be safeguarded.		Objects to Policy NE6 which is not sufficiently flexible, and fails to identify and safeguard sufficient areas of land in Green Belt for future development. Further sites should be identified and safeguarded to meet needs arising beyond the plan period, particularly since the Green Belt has not been reviewed for almost 30 years in the city. 176 hectares of land at Burdon should be safeguarded.	Objects to Policy NE6 which is not sufficiently flexible, and fails to identify and safeguard sufficient areas of land in Green Belt for future development. Further sites should be identified and safeguarded to meet needs arising beyond the plan period, particularly since the Green Belt has not been reviewed for almost 30 years in the city. 176 hectares of land at Burdon should be safeguarded.	Exclude the submitted 176 hectare site from Green Belt.	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as a specific response relating to the site proposed for safeguarding at Burdon Village (see Policy SS3 Safeguarded Land).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Victoria	Hedley		PD810	Policy	NE6	Object		Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.			Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Objects to removal of site HGA7 from the Green Belt. The evidence base is weak and not consistent with National Policy. The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries.	Remove Site HGA7 as a housing allocation and retain the land as Green Belt. Amend maps in Plan to show land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas). The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land. The maps within the Plan do not show the HGA sites within the Green Belt because the maps relate to the proposed new Green Belt boundary.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
The Late Mrs M R	Swinburn		PD1494	Policy	NE6	Object		Objects to the boundary of the Green Belt proposed, putting forward that the development site proposed by the consultee is in a sustainable location, preserving the separateness of Springwell Village and having only slight impact on Green Belt purpose.			Objects to the boundary of the Green Belt proposed, putting forward that the development site proposed by the consultee is in a sustainable location, preserving the separateness of Springwell Village and having only slight impact on Green Belt purpose.	Objects to the boundary of the Green Belt proposed, putting forward that the development site proposed by the consultee is in a sustainable location, preserving the separateness of Springwell Village and having only slight impact on Green Belt purpose.	The green belt boundary should be altered to include the proposed development site.	The Council concludes that the site has a major overall adverse impact in relation to countryside encroachment. As such, the site was not considered at Green Belt Stage 3 Site Selection. Furthermore, the 2018 Green Belt Boundary Assessment (p25-27) notes that the wider section of Green Belt around Springwell and to the north of Usworth provides the entire strategic separation between Washington and Gateshead. Much of the constituent land is therefore deemed to be fundamental to the purposes of the Sunderland Green Belt in terms of preventing the city merging with Gateshead, and that, therefore, "there is no justification for removing Green Belt land adjacent to the administrative boundary between Sunderland and Gateshead." In conclusion, the Council considers the site provides clear Green Belt purpose and that Leam Lane provides a strong, distinct and robust Green Belt boundary that would be weakened by the proposed site. Therefore, the site is not supported.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Carmody		PD272	Policy	NE6	Object		Objects to Policy NE6 on the basis that it is not positively prepared.			Objects to Policy NE6 on the grounds that it is not consistent with National Policy.	Objects to Policy NE6 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														allocation and as set out within the plan the site is to retained for employment purposes. The Council has set out its specific response relating to site HGA7 in the Compliance Statement (see Policy SS4).	
Brian	Carmody		PD269	Policy	NE6	Object		Objects to Policy NE6 on the basis that it is not positively prepared.			Objects to Policy NE6 on the grounds that it is not consistent with National Policy.	Objects to Policy NE6 on the grounds that the removal of site HGA7 from the Green Belt is not justified and the evidence base is weak.	The Plan should be amended to remove site HGA7 and retain the land as Green Belt.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy). All suitable, available and achievable brownfield sites have been included within the housing supply, as set out within the SHLAA. The site included within the representation is an employment allocation and as set out within the plan the site is to retained for employment purposes. The Council has set out its specific response relating to site HGA7 in the Compliance Statement (see Policy SS4).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD5100	Policy	NE6	Support with mods						Overall support for the Policy, but Consultee's site to the east of A19 at Middle Herrington should be removed from the Green Belt. The site represents an anomaly and makes no contribution to Green Belt purpose.	Land to the east of A19 at Middle Herrington and Hastings Hill should be removed from Green Belt.	The proposal is not supported in light of both the impact to Green Belt purpose and the results of the Green Belt Boundary review. There remains a moderate overall adverse impact to Green Belt purpose in terms of checking unrestricted sprawl and in safeguarding countryside from encroachment (see Green Belt Assessment Stage 1 Updated and Stage 2, pages 147, 169 and 171). This area provides significant support to the Green Belt gap between Houghton and Sunderland, most critically between the area between West Herrington and Middle Herrington. The Green Belt Boundary Review (p35-36) also recommends that there should be no change to the Green Belt boundary, stating that "The existing boundary on the western edge of Grindon, south to Thorney Close, running south following the built-up area at Middle Herrington and bounding West Park" provides a logical and defensible boundary and there is no justification for making strategic amendments to this part of Sunderland's Green Belt boundary in our assessment." There are further significant issues that affect deliverability of the 3 sites put forward, including the immediate impact to 2 Scheduled Ancient Monuments, suitable access into the sites, impact to a SSSI, impact in parts to flooding, to historic ridge and furrow and to exposure with the A19. This point has been separately addressed in relation to Policies SS3 (Safeguarded Land) and Policy SP5 (South Sunderland).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mary	Peel		PD8429	Policy	NE6	Object			Concern that the removal of sites HGA 1, 2 & 3 would discourage the development of brownfield sites. Queries the removal of a policy seeking to "preserve the setting and special character of Springwell Village".		Concern that the removal of sites HGA 1, 2 & 3 would discourage the development of brownfield sites. Queries the removal of a policy seeking to "preserve the setting and special character of Springwell Village".	Concern that the removal of sites HGA 1, 2 & 3 would discourage the development of brownfield sites. Queries the removal of a policy seeking to "preserve the setting and special character of Springwell Village".	No Modification proposed.	The Council considers this Policy to be sound. The Council has prioritised the development of brownfield sites, increased densities and considered empty properties where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. The evidential basis justifying the release of sites HGA1, HGA2 and HGA3, as well as all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that the removal of these sites does not have a fundamental adverse impact on the Green Belt and that the sites are available, achievable and deliverable and so are considered suitable HGA sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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James	Ebdale		PD3249	Policy	NE6	Object				Removal of Site HGA7 from the Green Belt has not been adequately justified. The Plan does not include any assessment of exceptional circumstances in relation to the Green Belt. The Plan has no reliable evidence base to either demonstrate exceptional circumstances in principle or justify the change of boundary for the site. Failure to justify the Green Belt deletions is contrary to the NPPF.	Removal of Site HGA7 from the Green Belt has not been adequately justified. The Plan does not include any assessment of exceptional circumstances in relation to the Green Belt. The Plan has no reliable evidence base to either demonstrate exceptional circumstances in principle or justify the change of boundary for the site. Failure to justify the Green Belt deletions is contrary to the NPPF.	The Plan requires a wholesale review of the evidence base.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy, and SP4 North Sunderland), and specific detail regarding site HGA7 is provided for in Policy SS4 (North Sunderland Housing Growth Areas). The Council has prioritised the development of brownfield land when preparing the plan, however there is an insufficient supply of deliverable sites to meet the housing requirement within the plan period. Further details are provided in the Exceptional Circumstances Report. The Council has considered the viability of a range of site typologies through the Viability Assessment, including brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Susan	Hardy		PD7456	Policy	NE6	Object				The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	The removal of site HGA7 from the Green Belt is not justified nor is it consistent with national policy	No Modification proposed.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore is it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of site HGA7, and all other housing growth areas, from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, site HGA7 is available, achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land. Further justification for this Policy is set out in Compliance Statement SP4. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1203	Policy	NE6	Support					Support for the policy, but there needs to be strategic and collective review of the Green Belt across the 5 Tyne and Wear Authorities to consider its future boundary, and to make consistent with the revised NPPF.	Any modifications should be justified following a strategic review across the 5 Tyne and Wear Authorities. Without such evidence, there is concern that the Green Belt is at risk of persistent deletions which will impact on its effectiveness. This evidence would be consistent with paragraph 137 of the revised NPPF.	The Council has worked closely with neighbour local authorities to make them aware of potential changes to Sunderland's Green Belt. All of the Tyne and Wear local authorities (and County Durham) have considered (or are currently considering) their future Green Belt boundaries in relation to their own Local Plan, and have liaised with neighbour authorities on Green Belt matters. Sunderland's proposed changes impact on only 5% of the city's Green Belt, and these changes seek to minimise impact to neighbouring authority areas and to minimise overall impact to Green Belt purpose. The overall impact of Sunderland's Green Belt proposed alterations are	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														considered to be negligible in relation to the overall purposes of the Tyne and Wear (and County Durham) Green Belt.	
WYNYARD HOMES		Wynyard Homes	PD4705	Policy	NE6	Support					Support Policy NE6 which is consistent with the NPPF, but question the need to release land from the Green Belt, when appropriate non Green Belt sites are available, such as land at Quarry House Lane.		Include land at Quarry House Lane as a housing allocation.	The Council notes the support to the policy and has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy). The Council does not support the site put forward by Wynyard Homes due to the fundamental impact on Settlement Break. As explained in the 2018 Settlement Break Review (Chapter 13, pages 139-149) this site (represented by field parcels 8 and 10) provides strong Settlement Break purpose, helping to retain East Rainton distinct character and keep separate from Hetton-le-Hole. This is broadly supported by the 2012 NPPF (paragraph 58), which states that planning policies and decisions should aim to ensure that developments respond to local character and history. The Revised NPPF (2018) paragraphs 122 and 127 is more clear on this, stating that development should be sympathetic to local character and setting and maintain an area prevailing character and setting. Although East Rainton has witnessed expansion over recent decades (and very recently with the Avant Homes site to the north of the village), the village is mediaeval in origin, dating back to at least the 12th Century, and the scale of the development proposed would impact significantly on its character, expanding the urban envelope by more than 30%. In addition to this, the field parcels also plays a key role in terms of green infrastructure connectivity, supporting a district-wide corridor that links Hetton Bogs and the Moors Burn southwards into County Durham. Priority species are also found within or in close proximity to the site. (see Policy SP6 The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey		Taylor Wimpey	PD3838	Policy	NE6	Support						Taylor Wimpey welcomes the revisions to Policy NE6 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and Policy E11 (as it was then referenced).	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	MS. Taylor & Ms. McClelland		PD4369	Policy	NE6	Object		The policy (and supporting Green belt Reviews) recommends site deletions that do not take account or address the 5 purposes of Green Belt. There are no exceptional circumstances for justifying this as there are non-Green Belt sites available.					No modifications proposed.	The Council has assessed the city's entire Green Belt against the 5 Green Belt purposes, and this is detailed in the Green Belt Assessment Stage 1 Updated and Stage 2 Report. The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as a specific response relating to the site proposed for development at Hutton Close (see Policy SP6 The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5081	Policy	NE6	Object		The Policy cannot be delivered if Sites HGA1,2 and 3 are removed from the Green Belt. The removal of these sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield and urban sites. Removal of these sites would also conflict with the requirement to preserve the setting and special character of Springwell Village.	The Policy cannot be delivered if Sites HGA1,2 and 3 are removed from the Green Belt. The removal of these sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield and urban sites. Removal of these sites would also conflict with the requirement to preserve the setting and special character of Springwell Village.		The Policy cannot be delivered if Sites HGA1,2 and 3 are removed from the Green Belt. The removal of these sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield and urban sites. Removal of these sites would also conflict with the requirement to preserve the setting and special character of Springwell Village.	The Policy cannot be delivered if Sites HGA1,2 and 3 are removed from the Green Belt. The removal of these sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield and urban sites. Removal of these sites would also conflict with the requirement to preserve the setting and special character of Springwell Village.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology. The Council has prioritised the development of brownfield sites and increased densities where possible. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														<p>After assessing all reasonable alternative options, the most sustainable method of delivering the objectively assessed housing need of 13,410 new homes over the plan period is considered to be through the identified housing growth areas which will be released from the green belt. The evidential basis justifying the release of sites from the green belt is set out in in four documents: Green Belt Review Stage 1 (2016); Green Belt Assessment Stage 1 Updated and Stage 2 (2017); Stage 3 Green Belt Site Selection Report (2017); and the Green Belt Boundary Assessment and Recommendations (2018). These documents set out that, subject to mitigation, these sites are achievable and deliverable and therefore considered a suitable housing site. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.</p> <p>The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as responses relating to the HGA sites proposed (see SS2 Washington Housing Growth Areas; SP3 Washington).</p>	
EI Group		EI Group	PD837	Policy	NE6	Support with mods					<p>Consider that Copt Hill Public House and associated land should be removed from the Green Belt and considered for residential allocation. Feel that the site would meet the five Green Belt tests set out in the NPPF. Disagree with conclusions of Council's Green Belt Assessment Stage 3 as impacts are not insurmountable with good design, site is wholly sustainable and undeveloped part of the site as a minimum could be made available. No firm decisions made on future of Pub, but could be delivered as a small site or part of larger development with adjacent land.</p>	<p>Consider that Copt Hill Public House and associated land should be removed from the Green Belt and considered for residential allocation. Feel that the site would meet the five Green Belt tests set out in the NPPF. Disagree with conclusions of Council's Green Belt Assessment Stage 3 as impacts are not insurmountable with good design, site is wholly sustainable and undeveloped part of the site as a minimum could be made available. No firm decisions made on future of Pub, but could be delivered as a small site or part of larger development with adjacent land.</p>	<p>Remove Copt Hill Public House from Green Belt and consider as future housing allocation.</p>	<p>The reasons for not supporting this proposal are as follows. The Green Belt Assessment Stage 1 Updated and Stage 2 report confirms (p107) that the impacts to Green Belt purpose are moderate (particularly in relation to urban sprawl and countryside encroachment). In addition, the Green Belt Boundary Assessment (p38-39) concludes that "there is no basis to make any strategic boundary changes to this part of Sunderland's Green Belt." More specifically, Seaham Road provides a strong, defensible and well-defined boundary, and supports a logical eastern boundary to the Houghton-Hetton built-up area. Furthermore, this Green Belt is identified in the Sunderland Landscape Character Assessment to be of higher landscape value that should be protected and lies in close proximity to Copt Hill Scheduled Ancient Monument. It also forms an important part of a district-wide wildlife and Green Infrastructure corridor that links to the River Wear to the north, and southwards into County Durham.</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>
Colin	Ford		PD180	Policy	NE7	Object					<p>The policy is considered to be unsound in relation to land south of Houghton le Spring. The site is currently subject to a planning application, which concludes that the site is not contrary to the purposes of the settlement break, and it's not appropriate to continue to include the land as Settlement Break. The parcel of land no longer fulfils the function of preventing the merging of settlement, it does not physically or in perception terms fulfil the function of a Settlement Break. The site is surrounded on three sides by existing development. Therefore there is no practical or perceptual need for</p>	<p>The policy is considered to be unsound in relation to land south of Houghton le Spring. The site is currently subject to a planning application, which concludes that the site is not contrary to the purposes of the settlement break, and it's not appropriate to continue to include the land as Settlement Break. The parcel of land no longer fulfils the function of preventing the merging of settlement, it does not physically or in perception terms fulfil the function of a Settlement Break. The site is surrounded on three sides by existing development. Therefore there is no practical or perceptual need for</p>	<p>The Settlement Break boundary should be amended to delete parcel 1.</p>	<p>The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement (see Policy SP1). The justification for retaining the landowner's proposed development site at Hetton Bogs explained in Chapter 13 of the Settlement Break Report and in the Compliance Statement (Policy SP6) as follows: The Council does not support the site (SHLAA site 181) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 14) this site (represented by field parcel 1) provides strong Settlement Break purpose, helping to retain an impression of separateness and distinctiveness between Houghton-le-Spring and Hetton-le-Hole. The field parcel also plays a key role in terms of green infrastructure, providing a buffer to Hetton Bogs SSSI and Local Nature Reserve, Hetton Houses Wood LWS (and Ancient Woodland), and providing</p>	<p>The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.</p>

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											<p>maintenance of land parcel 1 within this part of the Settlement Break to be maintained for the purposes of preventing the merging of Settlements. It does not contribute towards the function of assisting in the regeneration of the urban area. This is evident by the fact that Green Belt land is being considered for development. The site should not be retained for Green Infrastructure, the site is of low ecological value and is only a buffer to the ecological area to the south. The policy does not refer to ecological buffers. The site is capable of being developed in a manner which both safeguards and enhances the ecological designations. It will also maintain the GI corridor. Parcel 1 cannot function as part of the GI corridor as it is surrounded by development on 3 side. The settlement break report is not robust, it make assumption relating to flood risk and contamination. The Application has been submitted in advance of the publication version of the Plan and therefore could not take it into consideration. The site should be included instead of Green Belt removal.</p>	<p>maintenance of land parcel 1 within this part of the Settlement Break to be maintained for the purposes of preventing the merging of Settlements. It does not contribute towards the function of assisting in the regeneration of the urban area. This is evident by the fact that Green Belt land is being considered for development. The site should not be retained for Green Infrastructure, the site is of low ecological value and is only a buffer to the ecological area to the south. The policy does not refer to ecological buffers. The site is capable of being developed in a manner which both safeguards and enhances the ecological designations. It will also maintain the GI corridor. Parcel 1 cannot function as part of the GI corridor as it is surrounded by development on 3 sides. The settlement break report is not robust, it make assumption relating to flood risk and contamination. The Application has been submitted in advance of the publication version of the Plan and therefore could not take it into consideration. The site should be included instead of Green Belt removal.</p>		<p>foraging areas for priority species. This is a particularly sensitive site and already under pressure from people and domestic pets. Although the landowner puts forward a buffer along the southern edge of the site, this area effectively forms part of the functional floodplain and is undevelopable (affected by Flood Zone 3). The site also supports the west-east corridor that follows the Rough Dene Burn. The SHLAA provides additional constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 54-56), highlighting that the site is a former waste/landfill site and may therefore contain pollutants (and thereby potential for abnormal remediation costs). The Council sets out a specific response relating to this site (see Policy SP6 The Coalfield).</p>	
Ray	Delaney		PD35	Policy	NE8	Object			For the avoidance of any doubt, a holding objection is submitted pending confirmation that policy NE8 will not be applied in the Green Belt.		For the avoidance of any doubt, a holding objection is submitted pending confirmation that policy NE8 will not be applied in the Green Belt.	Confirmation requested that policy NE8 will not be applied in the Green Belt.	The Council confirms that NE8 applies to a specifically allocated area that is separate from the Green Belt.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Nick	McClellan	Story Homes	PD5432	Policy	NE7	Support with mods		Not opposed to the selective use of Settlement Breaks where justified. However, Settlement Breaks are a restrictive policy which is not prescribed in national policy. The NPPF seeks a more flexible and positive approach and proposed settlement breaks could preclude development on potential development sites which are sustainable. To ensure that Policy NE7 is sound, additional text should be added to ensure the CSDP is positively prepared and effective.	Not opposed to the selective use of Settlement Breaks where justified. However, Settlement Breaks are a restrictive policy which is not prescribed in national policy. The NPPF seeks a more flexible and positive approach and proposed settlement breaks could preclude development on potential development sites which are sustainable. To ensure that Policy NE7 is sound, additional text should be added to ensure the CSDP is positively prepared and effective.			Additional wording proposed to sub-point 2(ii) to state that where a 5 year supply of sites can no longer be demonstrated, that sustainable housing sites in Settlement Breaks are duly considered.	Settlement Breaks (by virtue of their role as Green Infrastructure corridors) are consistent with Section 11 of the NPPF which seeks to conserve and enhance natural environments. More specifically NPPF paragraph 114 states that Local Plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, and paragraph 99 further states that Local Plans should take account of climate change over the longer term...including through the planning of green infrastructure. Settlement Breaks (forming Green Infrastructure) are also in line with latest Government policy, such as the 25 Year Plan for the Environment.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Adam	McVickers	Persimmon Homes (Durham)	PD4158	Policy	NE8	Object						Object to Policy NE8 on the grounds that it is overly restrictive and will potentially preclude the	No modifications proposed.	The Council's Strategic Land Review demonstrates that all of these open countryside areas are remote and rural, with numerous physical and environmental constraints/features.	The Council considers there have been no soundness or legal compliance issues raised by this

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												development of sustainable, edge of urban settlement sites.		These features help to create an overall area of higher landscape value and provide quality wildlife/Green Infrastructure corridors. They represent the least sustainable development areas in the city. The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy and Policy SP6 The Coalfield) and its approach in the Homes Chapter (see Policy SP8 Housing Supply and Delivery) and in relation to Paragraph 6.9.	representation which require modifications to the Plan. Therefore no modifications are proposed.
Avant Homes		PD1503	Policy	NE7	Object		Objects to Policy NE7 that policy is not sufficiently flexible to enable sustainable sites to come forward during the plan period and is not in line with national policy. The proposed Settlement Break area should exclude the site put forward by developer.	Objects to Policy NE7 that policy is not sufficiently flexible to enable sustainable sites to come forward during the plan period and is not in line with national policy. The proposed Settlement Break area should exclude the site put forward by developer.			Objects to Policy NE7 that policy is not sufficiently flexible to enable sustainable sites to come forward during the plan period and is not in line with national policy. The proposed Settlement Break area should exclude the site put forward by developer.	Objects to Policy NE7 that policy is not sufficiently flexible to enable sustainable sites to come forward during the plan period and is not in line with national policy. The proposed Settlement Break area should exclude the site put forward by developer.	The Settlement Break boundary should be amended to exclude the site put forward by the developer.	The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement which sets out the spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as Settlement Breaks (see Policy SP5 South Sunderland). The Council does not support the site put forward by Avant Homes (SHLAA site 638) for the following reasons. As explained in the Settlement Break Review (Chapter 2) this site (represented by field parcels 5 and 6) provides strong Settlement Break purpose, both by helping to maintain area identity and supporting an important Green Infrastructure and wildlife corridor that links the centre of the city to the coast. As the SHLAA Appendix N (South Sunderland) Report indicates (pages 141-143) there are numerous constraints that significantly impact on site suitability, achievability and deliverability- including the immediate impact on the adjacent Tunstall Hills SSSI and Local Nature Reserve, on priority species that are present on site, on the proximity of the coast (therefore subject to Habitats Regulations Assessment) and the impact to an area of higher landscape value and key city landmark. These are fundamental to the quality of the Green Infrastructure and wildlife corridor, and therefore to Settlement Break purpose.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	Unknown	Harworth Estates	PD2094	Policy	NE8	Object					Objects to Policy NE8 (and paragraph 10.37) on the grounds that the consultee's site beside Rainton Meadows (agricultural land /paddocks) is incorrectly identified as open countryside. However, the site is with the settlement boundary and is surrounded by built development. By designating a deliverable housing site on the edge of a business park as 'open countryside' the Core Strategy is conflicting with NPPF paragraph 21 and restricting growth in the area, and conflicts with "supporting a rural economy".	Objects to Policy NE8 (and paragraph 10.37) on the grounds that the consultee's site beside Rainton Meadows (agricultural land /paddocks) is incorrectly identified as open countryside. However, the site is with the settlement boundary and is surrounded by built development. By designating a deliverable housing site on the edge of a business park as 'open countryside' the Core Strategy is conflicting with NPPF paragraph 21 and restricting growth in the area, and conflicts with "supporting a rural economy".	The open countryside boundary should be altered to remove the Ryehill site (SHLAA 715) beside Rainton Meadows Nature Reserve.	The Council does not support the site put forward by Harworth Estates at Mallard Way, Ryehill (Policy SP6 The Coalfield) due to the fundamental impact on Policies SP6 and NE8 - and is therefore classed as inappropriate development. When considering site sustainability across Sunderland and the wider Tyne and Wear conurbation, this site is remote from public transport links and local services and retains a semi-rural character. Environmentally, there is substantial biodiversity impact - the site lies adjacent to a SSSI as well as abounding Rainton Meadows Local Nature Reserve and both priority and protected species are found on site. It helps to form a key wildlife and Green Infrastructure junction, with corridors stretching out along the Red Burn, Leamside Line corridor, towards Hetton-le-Hole and into County Durham. There are also considerable flood risk concerns relating to potential Flood Zones along the Red Burn and substantial surface water flooding affecting the site. The Strategic Land Review (Coalfield report, reference 859) identifies additional constraints including past coalmining activity that could impact on site achievability. The Council has also set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Hilary	Metcalf		PD961	Policy	NE7	Object		Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break	Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break		Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break	Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break	No modifications proposed.	The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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								purposes.	purposes.		purposes.	purposes.		From development. This is further explained in the Compliance Statement which sets out the spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as Settlement Breaks (see Policies SP5 South Sunderland and SP6 The Coalfield).	require modifications to the Plan. Therefore no modifications are proposed.
Scott	Metcalf		PD1009	Policy	NE7	Object		Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break purposes.	Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break purposes.			Objects to revised boundary of Settlement Breaks- too much land lost, to the detriment of Settlement Break purposes.	No modifications proposed.	The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement which sets out the spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as Settlement Breaks (see Policies SP5 South Sunderland and SP6 The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey	PD3854	Policy	NE8	Object								Proposed addition to Policy NE8: "At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites, which are located entirely or partially within the Open Countryside, that would both make a positive contribution to the five year supply of housing land and be well related to existing settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the CSDP. Proposals that come forward under this mechanism should be of a scale that respects the physical size of the settlement."	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy and Policy SP6 The Coalfield). It is not considered appropriate to develop land within the open countryside which is to be protected and enhanced, when suitable measures are in place to assist in bringing forward house building if delivery is not in line with the target.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD5119	Policy	NE8	Object							Proposed addition to Policy NE8: "At any point in the plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites, which are located entirely or partially within the Open Countryside, that would both make a positive contribution to the five year supply of housing land and be well related to existing settlements will be supported where these proposals comprise sustainable development and are consistent with relevant policies in the CSDP. Proposals that come forward under this mechanism should be of a scale that respects the physical size of the settlement."	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy) and in the Homes Chapter (See Policy SP8). It is not considered appropriate to develop land within the open countryside which is to be protected and enhanced, when suitable measures are in place to assist in bringing forward house building if delivery is not in line with the target.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4151	Policy	NE7	Object						Previously supported the review of Settlement Breaks as a means of identifying additional land supply. If Council is to retain	Reconsider the use of Settlement Breaks as a tool. Make it clear that the policy is considered out-of-date if a 5 year supply cannot be	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy and Policy SP6 The Coalfield) and its approach in the Homes Chapter (see Policy SP8 Housing Supply and Delivery) and in relation	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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												Settlement Breaks it is correct to review these, especially if Green Belt deletion is proposed. However, feel that Settlement Breaks as a tool are overly restrictive and preclude otherwise sustainable development from taking place. They are not endorsed nationally and their use should be reconsidered. As a minimum it should be made clear that if a five year supply cannot be evidenced that the policy is considered out-of-date. Support removal of area 4 from the High Dubmire/Dairy Lane/Houghton sub area. Object to the retention of area 5 of the Newbottle and Sedgelych subarea. Disagree with recommendations of the Settlement Break Review.	evidenced. Remove area 5 of the Newbottle and Sedgelych subarea from the Settlement Break.	to Paragraph 6.9. The Council sets out a specific response relating to the proposed housing site at the Russell Foster Football Pitches (area 5 of the Newbottle / Sedgelych subarea)- see Policy SP6 The Coalfield.	the Plan. Therefore no modifications are proposed.
	Ms. Taylor & Ms. McClelland		PD4398	Policy	NE7	Object						Propose a site for residential development within Settlement Break at Hutton Close, Houghton-le-Spring. It is considered that the loss of part of the settlement break would be a much more attractive and more reasonable alternative place for housing than the Green Belt.	Exclude the Hutton Close site from the settlement break designation.	The Council has set out its spatial approach/justification to housing land supply in the Compliance Statement (see Policy SP1 Spatial Strategy).The Council does not support the Hutton Close site (SHLAA site 340) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 11) this site (represented by field parcel 2) provides strong Settlement Break purpose, contributing to the separation of Houghton and Fence Houses/Colliery Row, and in particular contributing the green infrastructure corridor along the Moors Burn. The SHLAA provides more specific detail (see site 340 - SHLAA Appendix P Coalfield Site Assessments Report, pages 97-99), highlighting that the site is directly affected by the Moors Burn functional floodplain (Flood Zone 3 as well as Flood Zone 2).The land also lies within a Critical Drainage Area, and it is noted that immediately to the north the Moors Burn is flanked on its eastern edge by a man-made bund that helps to reduce flooding into the adjacent residential area. Therefore, major engineering solutions have already been undertaken in this locality, and this adds further uncertainty in terms of site suitability and achievability. The proximity of the site to the Moors Burn itself would also significantly impact on its setting as well as priority species that are known to exist within the corridor.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		Hellens	PD4674	Policy	NE7	Object		Settlement Break policy is a restrictive policy and not prescribed in national policy. The NPPF does not preclude development in open countryside, but encourages sustainable development. If Settlement Break policy endures the consultee requests that the boundaries are reviewed and based on logical boundaries. Wishes a site at Broomhill to be excluded from Settlement Break.	Settlement Break policy is a restrictive policy and not prescribed in national policy. The NPPF does not preclude development in open countryside, but encourages sustainable development. If Settlement Break policy endures the consultee requests that the boundaries are reviewed and based on logical boundaries. Wishes a site at Broomhill to be excluded from Settlement Break.			The Settlement Break boundary be altered to exclude the Broomhill site. Also suggests new wording to suggest that Settlement Breaks will be reviewed once a five year land supply cannot be demonstrated.	The Council has set out its Settlement Break approach and methodology in the Compliance Statement (Policy SP1 Spatial Strategy).Policy SP6 (The Coalfield) provides more context, as well as specific comments for the Broomhill site. The Council does not support the Broomhill site (SHLAA site 536) due to the fundamental impact on Settlement Break and also due to significant constraints that affect site suitability and achievability. As explained in the Settlement Break Review (Chapter 16) this site (represented by field parcel 2) provides strong Settlement Break purpose, acting as a green wedge and retaining an impression of separateness and distinctiveness between Houghton and Hetton. The site supports the wider Green Infrastructure and wildlife corridor that runs to the east of Houghton	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	

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														and Hetton, as well as supporting the west-east corridor that follows the Rough Dene Burn. The Burn runs immediately to the north of the site and is a protected wildlife site, including Ancient Semi-Natural Woodland. The western edge of this site forms the revised Settlement Break boundary, which follows a distinctive topographical divide, and also follows the eastern boundary of a former Settlement Break site that now has planning approval. The SHLAA provides more specific constraints detail (see site 536 - SHLAA Appendix P Coalfield Site Assessments Report, pages 180-181), highlighting that the site consists of undulating topography that provides quality natural greenspace, and is subject to past landfill.	
KARB ON HOM ES		PD3389	Policy	NE8	Support with mods			Support Policy NE8 and reference to rural exception sites, but to be effective it is necessary to provide more detail on rural exception sites and their potential contribution to affordable housing supply. Consider it would be more appropriate to have a separate policy for rural exception sites.					Have separate policy for rural exception sites and include more detail. Suggested policy wording provided.	The Council has considered whether rural exception sites are significantly relevant to the city that a standalone policy is required, or whether the reference to NE8 (part 3) provides sufficient context. For the most part, Sunderland forms part of the Tyne and Wear urban conurbation, and few areas could be considered to be genuinely rural. Springwell Village and East Rainton provide the 2 most significant examples of standalone villages within the area, and both are/have been subject to housing growth. Neither of these villages fall within the area of open countryside, as indicated by the CSDP. Beyond these two villages, only minor hamlets exist, and these are isolated in nature. An example within the open countryside area is Hetton-le-Hill, which consists of a handful of properties, with no adjacent facilities and limited access to public transport services. One of the principles of rural exception sites is to support sustainable development in rural areas, but it is not realistic to consider that rural exception sites within isolated hamlets could be considered sustainable development or justify a genuine need to provide affordable homes for families within these hamlets. It is also important to stress that the scale of hamlets does not match the strategic level of a Core Strategy and there will be opportunity for further review and potential to allocate sites as part of the city's Allocations & Designations Plan. The Council therefore concludes that the present Policy provides sufficient context at this strategic level, and that the issue will be considered further at the A&D Stage of the Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5447	Policy	NE8	Object			The consultee recognises that the area of Open Countryside relates to a relatively small area of the City towards the south and west. However, Policy NE8 could preclude development on sites which are sustainable. National policy seeks a more flexible and positive approach.				Additional wording proposed after sub-point 9 as a separate paragraph to state that where a 5 year supply of sites can no longer be demonstrated, that sustainable housing sites in open countryside are duly considered.	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy) and in the Homes Chapter (See Policy SP8). It is not considered appropriate to develop land within the open countryside which is to be protected and enhanced, when suitable measures are in place to assist in bringing forward house building if delivery is not in line with the target.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Avant Homes		PD1513	Figure	41	Object		The Settlement Break area should be amended to exclude the site proposed by the consultee.	The Settlement Break area should be amended to exclude the site proposed by the consultee.			The Settlement Break area should be amended to exclude the site proposed by the consultee.	The Settlement Break area should be amended to exclude the site proposed by the consultee.	To alter the boundary to exclude site proposed by consultee.	The 2018 Settlement Break report sets out the approach to these land areas, explaining how large areas of Settlement Break have been released for development, and why the remaining areas should be protected from development. This is further explained in the Compliance Statement which sets out the spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy), as well as Settlement Breaks (see Policy SP5 South Sunderland). The Council does not support the site put forward by Avant Homes (SHLAA site 638) for the following reasons. As explained in the Settlement Break Review (Chapter 2)	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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													this site (represented by field parcels 5 and 6) provides strong Settlement Break purpose, both by helping to maintain area identity and supporting an important Green Infrastructure and wildlife corridor that links the centre of the city to the coast. As the SHLAA Appendix N (South Sunderland) Report indicates (pages 141-143) there are numerous constraints that significantly impact on site suitability, achievability and deliverability- including the immediate impact on the adjacent Tunstall Hills SSSI and Local Nature Reserve, on priority species that are present on site, on the proximity of the coast (therefore subject to Habitats Regulations Assessment) and the impact to an area of higher landscape value and key city landmark. These are fundamental to the quality of the Green Infrastructure and wildlife corridor, and therefore to Settlement Break purpose.		
WYNARD HOMES	Wynyard Homes	PD4709	Policy	NE7	Object	There is a degree of conflict between Policy NE7 and the NPPF as Settlement Breaks are not afforded the same level of protection. Consider that land at Quarry House Lane should not be included in the Settlement Break between East Rainton and Hetton-le-Hole. With significant buffer of tree planting, open grassland and wetland proposed housing could be developed without unacceptably impinging on the Settlement Break.				There is a degree of conflict between Policy NE7 and the NPPF as Settlement Breaks are not afforded the same level of protection. Consider that land at Quarry House Lane should not be included in the Settlement Break between East Rainton and Hetton-le-Hole. With significant buffer of tree planting, open grassland and wetland proposed housing could be developed without unacceptably impinging on the Settlement Break.	There is a degree of conflict between Policy NE7 and the NPPF as Settlement Breaks are not afforded the same level of protection. Consider that land at Quarry House Lane should not be included in the Settlement Break between East Rainton and Hetton-le-Hole. With significant buffer of tree planting, open grassland and wetland proposed housing could be developed without unacceptably impinging on the Settlement Break.	Exclude land at Quarry House Lane from the Settlement Break and include as a housing allocation.	The Council has set out its spatial approach/justification to housing land supply (see Policy SP1 Spatial Strategy). The Council does not support the site put forward by Wynyard Homes due to the fundamental impact on Settlement Break. As explained in the 2018 Settlement Break Review (Chapter 13, pages 139-149) this site (represented by field parcels 8 and 10) provides strong Settlement Break purpose, helping to retain East Rainton distinct character and keep separate from Hetton-le-Hole. This is broadly supported by the 2012 NPPF (paragraph 58), which states that planning policies and decisions should aim to ensure that developments respond to local character and history. The Revised NPPF (2018) paragraphs 122 and 127 is more clear on this, stating that development should be sympathetic to local character and setting and maintain an area prevailing character and setting. Although East Rainton has witnessed expansion over recent decades (and very recently with the Avant Homes site to the north of the village), the village is mediaeval in origin, dating back to at least the 12th Century, and the scale of the development proposed would impact significantly on its character, expanding the urban envelope by more than 30%. In addition to this, the field parcels also plays a key role in terms of green infrastructure connectivity, supporting a district-wide corridor that links Hetton Bogs and the Moors Burn southwards into County Durham. Priority species are also found within or in close proximity to the site. (See Policy SP6 The Coalfield).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Barbara	Hooper	Historic England	PD113	Paragraph	10.46	Support						Historic England welcomes the reference to the Historic Landscape Characterisation Report within this section.	No modification proposed	Support noted. The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3256	Policy	NE9	Support						Support Policy NE9, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey		Taylor Wimpey	PD3877	Policy	NE9	Support						Supports the revisions to Policy NE9 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are

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												Policy E16 (as it was then referenced).			proposed.
James	Hudson	Environment Agency	PD210	Policy	NE10	Support						Support the policy	Could incorporate estuary edges techniques to soften hard edges and create habitat to enhance coastal ecosystems where opportunities arise.	A Statement of Common Ground has been agreed between the Council and the Environment Agency. The Council and the Environment Agency agree that no changes are required to Policy NE10 and the Policy is sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1396	Policy	NE10	Support							No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Angela	Templeman	Springwell Village Residents Association	PD5091	Policy	NE11	Object		Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. The site would particularly conflict with Part 3 of the Policy.	Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. The site would particularly conflict with Part 3 of the Policy.		Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. The site would particularly conflict with Part 3 of the Policy.	Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. The site would particularly conflict with Part 3 of the Policy.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	The Council considers that the objection relates more to Policy SS2 (HGA1) as opposed to the objectives of Policy NE11. The above impacts are discussed in detail in the Council's response to Policy SS2 (HGA1).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3257	Policy	NE11	Support						Support Policy NE11, which reflects National Guidance in the NPPF.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1221	Policy	NE12	Support						Support the policy but puts forward that all Grade 2 agricultural land should be safeguarded from development. Furthermore, in line with NPPF paragraph 170, the benefits of Natural Capital needs to be considered in all cases where agricultural land is considered" including lower grade land lying on the Magnesian Limestone Plateau.	The Strategy should address how to deal with the benefits of agricultural land and the potential it has for Natural Capital.	The Council considers that the proposals put forward by the CPRE are not in line with the NPPF which does not advocate safeguarding all Grade 2 agricultural land from development. There is no known evidence to justify the protection of lower grade land lying on the Magnesian Limestone Plateau.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ellen	Bekker	Natural England	PD2764	Paragraph	10.5	Support with mods					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.		Text should state that lower quality agricultural land should be used for development in preference to best and most versatile agricultural land.	The Council, in discussion with Natural England, have signed a Statement of Common Ground and have agreed that such a reference would replicate NPPF policy, and have agreed that such reference is not required in the CSDP text. The Council has signed a Statement of Common Ground with Natural England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey		PD3878	Policy	NE11	Support						Supports the revisions to Policy NE11 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and Policy E15 (as it was then referenced).	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey		PD3892	Policy	NE12	Support						Supports the revisions to Policy NE12 and the supporting text which aligns with the requested changes submitted as part of our responses to Draft CSDP, and Policy E16 (as it was then referenced).	No modifications proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Walters	National Trust	PD4056	Policy	NE11	Support with mods						The National Trust strongly supports reference to the long distance and panoramic views of land from Grade I	Policy NE11 could be strengthened by recognising that more significant development proposals, such as	The Council acknowledges this request but would also highlight that paragraph 10.45 (supporting Policy NE9 Landscape Character) states that applicants will be expected to submit a Landscape and Visual Impact	The Council considers there have been no soundness or legal compliance issues raised by this representation which

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											listed Peshaw Monument within the supporting text of Policy NE11 and the acknowledgement that these views make a substantial contribution to the quality of environment. In this respect we welcome the protection from intrusive developments afforded to these exceptional views in para. 10.48 of Policy NE1. We note that Policy HGA9, a strategic site allocation to the south and west of the monument, contains a similar requirement that new development respects views and the setting of Peshaw Monument.	allocated housing and employment sites, may need to be accompanied by a Landscape and Visual Impact Appraisal in order to assess impacts of iconic features.	Assessment to demonstrate that they have met the policy's requirements, which includes addressing key and distinctive landscape characteristics as identified in the city's Landscape Character Assessment. Furthermore, paragraph 10.49 states that the Allocations & Designations Plan will identify key local views and vistas to deliver Policy NE11- therefore this could also provide further detail as to when Landscape and Visual Impact Appraisal would be required in relation to protecting key views/vistas and iconic features. The Council concludes that no further amendment is required to the CSDP, but further detail can be provided at the Allocations & Designations Plan stage.	require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1421	Policy	WWE1	Object				CPRE is concerned that the policy does not recognise the effect of the Written Ministerial Statement of June 2015 regarding Wind Turbine development, now contained in the revised NPPF (see Footnote 49). The Strategy does not designate any area as being suitable for wind turbine development. Clearly, if any area were to be allocated, there would need to be full consultation in respect of it.		The Strategy should clarify that either no future wind turbine development is appropriate in the City or should specify where it can occur and fully consult in respect of any such allocation.	The CSDP will be followed by an Allocations and Designations Plan (DPD) which could set suitable locations for wind energy development, where appropriate, as set out in CSDP paragraph 11.7.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD152	Chapter	11	Support					Northumbrian Water supports policies WWE2 and WWE3, particularly WWE2 ii and WWE3 13 and 9.	No modification proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Carol	Dougherty		PD8205	Policy	WWE1	Object					The location of the proposed Renewable Energy Centre in Washington conflicts with Policy WWE1.	Energy from waste plants should only be considered as far away from schools and residential properties as possible, or not at all.	The policy sets an appropriate and justified approach to assessing decentralised, renewable and low carbon energy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ryan	Molloy	Thompsons of Prudhoe	PD193	Chapter	11	Object	The waste chapter of the Plan only deals with the management of municipal waste and not all waste streams. Municipal waste only covers 13% of the waste managed in the North East and the Plan should cover all types of waste. There is forecast to be a significant drop in recycling of C&I and C, D & E waste capacity between 2020 and 2025. There is also forecast to be a drop in landfill capacity in these years. Springwell Quarry remaining open can help to meet this demand. Springwell Quarry	The waste chapter of the Plan only deals with the management of municipal waste and not all waste streams. Municipal waste only covers 13% of the waste managed in the North East and the Plan should cover all types of waste. There is forecast to be a significant drop in recycling of C&I and C, D & E waste capacity between 2020 and 2025. There is also forecast to be a drop in landfill capacity in these years. Springwell Quarry remaining open can help to meet this demand. Springwell Quarry manages a		The waste chapter of the Plan only deals with the management of municipal waste and not all waste streams. Municipal waste only covers 13% of the waste managed in the North East and the Plan should cover all types of waste. There is forecast to be a significant drop in recycling of C&I and C, D & E waste capacity between 2020 and 2025. There is also forecast to be a drop in landfill capacity in these years. Springwell Quarry remaining open can help to meet this demand. Springwell Quarry manages a	The waste chapter of the Plan only deals with the management of municipal waste and not all waste streams. Municipal waste only covers 13% of the waste managed in the North East and the Plan should cover all types of waste. There is forecast to be a significant drop in recycling of C&I and C, D & E waste capacity between 2020 and 2025. There is also forecast to be a drop in landfill capacity in these years. Springwell Quarry remaining open can help to meet this demand. Springwell Quarry manages a	The chapter should be amended to consider waste streams other than municipal waste. Policy WWE9 2(v) should be altered to allow recycling operations to continue at an appropriate mineral or landfill site even after the original use of the site is ceased.	The Policies of the Plan deal with the management of all waste streams. Policy WWE8 indicates that the Council will safeguard all existing waste management sites from inappropriate development, not just those identified in Table 2.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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							manages a large volume of waste and should be identified as a safeguarded site. Policy WWE9 fails to acknowledge the push by Government to recycle waste and open facilities such as at Springwell will become established over time because of the need to recycle waste rather than dispose of the waste.	large volume of waste and should be identified as a safeguarded site. Policy WWE9 fails to acknowledge the push by Government to recycle waste and open facilities such as at Springwell will become established over time because of the need to recycle waste rather than dispose of the waste.			large volume of waste and should be identified as a safeguarded site. Policy WWE9 fails to acknowledge the push by Government to recycle waste and open facilities such as at Springwell will become established over time because of the need to recycle waste rather than dispose of the waste.			
Taylor Wimpey	Taylor Wimpey	PD3894	Policy	WWE2	Support with mods						Broadly supports the policy but puts forward that supporting paragraph 11.13 should also acknowledge that development (along with surface water management strategies) have the potential to result in betterment for a site and a local area.	Taylor Wimpey considers that paragraph 11.13 should acknowledge that development (along with surface water management strategies) have the potential to result in betterment for a site and a local area.	The purpose of paragraph 11.13 is to set out the appropriate mitigating techniques for surface water run-off and setting out the appropriateness of SuDS. Given the nature of this paragraph it is not considered necessary to set out that development (along with surface water management strategies) have the potential to result in betterment for the site and a local area.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD5141	Policy	WWE2	Support with mods					Broadly supports the policy but puts forward that supporting paragraph 11.13 should also acknowledge that development (along with surface water management strategies) have the potential to result in betterment for a site and a local area.	Taylor Wimpey considers that paragraph 11.13 should acknowledge that development (along with surface water management strategies) have the potential to result in betterment for a site and a local area.	The purpose of paragraph 11.13 is to set out the appropriate mitigating techniques for surface water run-off and setting out the appropriateness of SuDS. Given the nature of this paragraph it is not considered necessary to set out that development (along with surface water management strategies) have the potential to result in betterment for the site and a local area.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1976	Policy	WWE2	Support with mods	Does not object to overall policy approach, but should be amended to make clear that sites in higher flood risk areas can come forward subject to engineering solutions.					Amend Policy WWE2 to make clear that development in higher flood risk areas could come forward, subject to engineering solutions.	The CSDP sets out a justified approach to flood risk management. Setting out a sequential and exceptions test as part of policy WWE2 in alignment with the National Planning Policy Framework (2012) (paragraph 100) and directing growth to areas of lowest flood risk. This approach does not preclude the possibility of development within high risk flood zones, but such proposals must meet provisions set by Policy WW2 and the plan as a whole.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD215	Policy	WWE2	Support with mods					The EA support the policy and welcome the statement encouraging development towards flood zone 1 and that flood risk is reduced overall.	The EA would like to see the inclusion of text that the Plan would not support any development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain)	The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k). The CSDP already includes provisions to limit development within areas of the highest flood risk. This is set out in paragraph 1 of Policy WWE2 which sets out a sequential and exceptions test for applicable applications. Additionally, paragraph 11.9, sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Also, paragraph 11.10, states that development should be directed towards locations which are at the lowest risk from flooding.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5372	Policy	WWE3	Support with mods		Broad support for Policy WWE3 subject to minor changes proposed to ensure that the policy is more effective and flexible.				Changes proposed to Policy WWE3: Development must consider the effect on flood risk, on-site and off-site, commensurate with the scale and impact. Development "should seek to" ... 3. incorporate a SuDS "where appropriate" to manage surface water drainage.....	The Council acknowledge the support for the policy. It is not considered necessary to change the policy from "development must" to "development should". SuDS form a diverse category of surface water management techniques and will form a key feature of surface water management across all applicable developments. Therefore, it is considered the term "development must" is appropriate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD833	Policy	WWE3	Object					Northumbrian Water (NWL) have identified that there is a need for reservoir for the storage of drinking water in the Wearside area. NWL is concerned that there is no reference to the delivery of a new reservoir in the Plan. The reservoir	No modification proposed	With regards to the Northumbria Water comment, the Council do not consider the planning case for a reservoir has been proven to the Council. The Council has sought to address infrastructure requirements through the Infrastructure Delivery Plan (IDP) with Northumbria Water not expressing the need for the reservoir. In any event the Allocation and Designations Plan (DDP) will seek to allocate and designate land for the purposes of infrastructure	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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											needs to be located at a certain height, low enough to enable water to reach it by gravity flow but high enough so that a large area can be supported by gravity flow from the reservoir. The proposed site is in Springwell, at south Mount Lane. It will be partially buried with grass covered earth embankments on all sites and a grass covered roof. As the site is in Green Belt, very special circumstances will be justified through the planning application process. The Plan make no reference to the development of the reservoir and the need to address the boundary between the HGA site and it.		requirements.	
Peter	Nailon	Wear Rivers Trust	PD1483	Policy	WWE3	Support					Pleased that the Plan references Magnesian Limestone and associated water management vulnerabilities associated with thin and permeable glacial drift overlying the hard rock aquifer, which could affect the city's drinking water supply.	No modifications proposed.	The Council acknowledge the Wears River Trust support for the Policy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2732	Policy	WWE3	Support with mods		Suggest minor changes to Policy wording to ensure that Policy WWE3 is effective.				Amend Policy WWE3 by to indicate that development should, rather than must, incorporate SUDs where feasible and delete reference to the management of water being an intrinsic part of the overall development.	In response to the Burdon Lane Consortium comment, the Council acknowledge the broad support for the policy. It is not considered necessary to change the policy from 'development must' to 'development should'. SuDS form a diverse category of surface water management techniques and will form a key feature of surface water management across all applicable developments. Therefore, it is considered the term 'development must' is appropriate.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD216	Policy	WWE3	Support with mods					The EA support the policy however, if SuDS are to be incorporated into any or all of the proposed developments the EA 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.	No modifications proposed	The Council considers this policy to be sound. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey	PD3904	Policy	WWE3	Support with mods						The policy is broadly supported but the first 3 points should be deleted as there is considerable duplication with WWE2. Opening sentence should enable more flexibility and states "development should" rather than "development must". The final sentence of point 9 should also be deleted.	Opening sentence of policy should state "development should" rather than "development must". Points 1, 2 and 3 should be deleted. Final sentence of point 9 is recommended for deletion, i.e. "for all developments the management of water should be an intrinsic part of the overall development".	The Council acknowledge the broad support for the policy. It is not considered that there is duplication between parts 1 to 3 of Policy WWE3. Part 1 of the policy, sets out the requirement that development must be accompanied by a Flood Risk Assessment which should demonstrate that development will be safe without increasing or exacerbating flood risk elsewhere. Part 2, sets that development sets out the need to pass a sequential test and if necessary the exceptions test in flood risk zones 2 and 3. Part 3, sets out policy on Greenfield runoff rates for 1 in 1 and 1 in 100 flood events.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Jennifer	Nye	Hellens Land Ltd	PD5152	Policy	WWE3	Support with mods					The policy is broadly supported but the first 3 points should	Opening sentence of policy should state "development	The Council acknowledge the broad support of the policy. It is not considered that there is duplication	The Council considers there have been no soundness or legal

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											be deleted as there is considerable duplication with WWE2. Opening sentence should enable more flexibility and states "development should" rather than "development must". The final sentence of point 9 should also be deleted.	should" rather than "development must". Points 1,2 and 3 should be deleted. Final sentence of point 9 is recommended for deletion, i.e. "for all developments the management of water should be an intrinsic part of the overall development".	between parts 1 to 3 of Policy WWE3. Part 1 of the policy, sets out the requirement that development must be accompanied by a Flood Risk Assessment which should demonstrate that development will be safe without increasing or exacerbating flood risk elsewhere. Part 2, sets that development sets out the need to pass a sequential test and if necessary the exceptions test in flood risk zones 2 and 3. Part 3, sets out policy on Greenfield runoff rates for 1 in 1 and 1 in 100 flood events.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpey	Taylor Wimpey	PD3914	Policy	WWE4	Support						Broadly supports Policy WWE4 which appears to be an amended version of Policy CM6 in the Draft CSDP.	No modifications proposed.	The Council acknowledge Taylor Wimpey's broad support for policy WWE4.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD211	Policy	WWE4	Support					The EA fully support this policy, particularly point 4.	No proposed modifications	Support noted. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD2669	Policy	WWE5	Support with mods					Broadly supports the policy, but policy should be amended to extend this support to include water treatment works, in order to ensure that drinking water supply can meet increasing demand.	Policy should be amended to extend this support to include water treatment works, in order to ensure that drinking water supply can meet increasing demand.	The Council acknowledge Northumbria Waters broad support for the policy. The Council do not consider it necessary to include the term "water treatment works" into the policy. This would be inappropriate as the policy deals with foul water and not water processes for drinking water. The Allocations and Designation Plan DPD will provide an appropriate basis for allocating land for the purposes of water treatment plans where they are required.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1400	Policy	WWE6	Support with mods						No Modification proposed.	The Council note this response. The Council will engage with Durham County Council and other regional authorities on this matter. Any required allocations within Sunderland will be made through the emerging A&D Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD114	Policy	WWE6	Support					Historic England welcomes the reference to heritage assets in part (7).	No modification proposed	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Neil	Cole	South Tyneside Council	PD4424	Policy	WWE6	Support						No proposed modification	Comment noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD217	Policy	WWE5	Support with mods					The EA supports this policy, however would recommend that the policy also covers the requirement for any development proposing to discharge trade effluents to provide a water management plan. The EA would recommend that all foul and surface water drainage be directed to main sewer where possible. The policies will all prevail but the EA request that as part of any new development risks	No modification proposed	The Council acknowledges the response from the Environment Agency. The Statement of Common Ground (SD.8k) between the Environment Agency and the Council proposed the following major modification to be considered by the Inspector during the examination. The modification would set out a new part (part 4) to Policy WWE5 Disposal of Foul Water. This will set out the following, where the development involves disposal of trade effluent a Foul Water Management Plan/Drainage Assessment will be	The Statement of Common Ground between the Environment Agency and the Council proposed the following major modification to be considered by the Inspector during the examination. The modification would set out a new part (part 4) to Policy WWE5 Disposal of Foul Water. This will set out the following, where the development involves disposal of trade effluent a Foul Water Management Plan/Drainage Assessment will be

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											from the proposed uses of the site to underlying groundwater are assessed and addressed to ensure that the development is acceptable.			required to demonstrate how disposal of foul water is undertaken following the drainage 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.	
Stuart	Timmiss	Durham County Council	PD1399	Policy	WWE8	Support				Note Policy WWE8 has amended to safeguard all waste sites. This amendment is welcomed and addresses Durham County Council's previous representations.		No modifications proposed.	The Council note this representation.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Carol	Dougherty		PD8206	Policy	WWE10	Object					The proposed Renewable Energy Centre in Washington conflicts with Policy WWE10.	Energy from waste plants should only be considered as far away from schools and residential properties as possible, or not at all.	The Council considers this policy to be sound. The plan does not allocate an energy from waste site.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Frances	Nicholson	Bellway Homes Ltd	PD1825	Policy	SP10	Support with mods					Generally support Policy SP10 and the Doxford-Ryhope link road but would like the alignment to be altered to that it does not sterilise some of their land interest.	Re-align the route of the Ryhope Doxford link road on the Policies Map.	Comment noted. The alignment shown on the Policies Map is consistent with that within the existing UDP and SSGA SPD. The final alignment will be subject to detailed survey work and design.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Stephen, Baker, PD8114 Emma, Baker, PD8111 Laura, Bowden, PD8116 Marco, Bulmer-Rizzi, PD8153 Norma, Clark, PD8107 Linda, Cumming, PD8062 Malcolm, Cumming, PD8084 Andrew, Devlin, PD8056 Leanne, Greenlaw, PD8163 Karlene, Holbrow, PD8079 John, Houghton, PD8121 Andrew, Jackson, PD8129 James, Jolley, PD8151 Robin, Laybourne, PD8139 Karin, Laybourne, PD8146 Catherine, Mckie, PD8083 Paul, Moorhead, PD8134 Laura, Moorhead, PD8137 Daniela, Neri, PD8106 Ian, Plews, PD8089 Kelly, Plews, PD8103 Sheila, Robson, PD8144 Carl, Shevill, PD8124 Alan, Tate, PD8073 Diane, Tate, PD8085 Sacha, Thompson, PD8068 Andrew, Thompson, PD8078 Kim, Turnbull, PD8131 Pamela, Walton, PD8149 Paul, Waring, PD8156				Policy	SP10	Object	Object to Policy SP10 particularly the inclusion of a road through Elba Park. The development of the road would split a park into two and reroute heavy traffic between Industrial Estate Motorways and family homes. It is unclear if evidence has been prepared to justify the road, for example traffic surveys	Object to Policy SP10 particularly the inclusion of a road through Elba Park. The development of the road would split a park into two and reroute heavy traffic between Industrial Estate Motorways and family homes. It is unclear if evidence has been prepared to justify the road, for example traffic surveys				The reference to a road through Elba Park should be removed.	The Coalfield Regeneration Route is a longstanding commitment of the Council. It is included in the UDP and has a partially implemented planning permission. The section between the roundabout joining the A183 and A182 and the new housing site at Elba Park has already been completed. The entire proposed alignment is set out in the supporting text of the policy. The alignment is proposed as such to maximise the land available for housing at the Elba Park site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements. It is constrained by the presence of protected archaeological remains of a wooden waggonway to the west and encapsulated contaminated ground conditions as a result of historic cokeworks to the east. There is no available alternate alignment for the road. The road will support housing and employment regeneration and improve connectivity in the Coalfield. Developer contributions will be sought to fund completion of this road. Further justification for this Policy is set out in the Compliance Statement. The Council considers this Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Julie, Casey, PD8039 R, Casey, PD8066 Paul, Christer, PD1258 Katherine, Elliott, PD8022 Lee, Elliott, PD8038 Gina, Hewitt, PD8057 Sara, Horsley, PD8080 Peter, Horsley, PD8069 Gail, Mills, PD8090 Kim, Minshall, PD8123 Kelly, Moore, PD8105 Kelly, Moore, PD8099 Laura, Poxton, PD8152 Amy, Reid, PD8109 Michael, Robinson, PD8110 Kathleen, Rooney, PD8132 Christine, Savage, PD8143 Carl, Shevill, PD8108 Bernadette, Snell, PD8148 John, Walton, PD8127				Policy	SP10	Object			Object to the inclusion of the new road through Elba Park on the grounds that it would split a much loved family park into two, damage the wildlife and result in the loss of a natural green boundary with Durham. The Council need to explore alternative routes for the alignment of the Park. The road will not encouraging walking and will destroy cycle paths and footpaths. It will			Object to the inclusion of the new road through Elba Park on the grounds that it would split a much loved family park into two, damage the wildlife and result in the loss of a natural green boundary with Durham. The Council need to explore alternative routes for the alignment of the Park. The road will not encouraging walking and will destroy cycle paths and footpaths. It will	Remove Policy SP10	The Coalfield Regeneration Route is a longstanding commitment of the Council. It is included in the UDP and has a partially implemented planning permission. The section between the roundabout joining the A183 and A182 and the new housing site at Elba Park has already been completed. The entire proposed alignment is set out in the supporting text of the policy. The alignment is proposed as such to maximise the land available for housing at the Elba Park site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements. It is	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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Pamela, Walton, PD8133 Angela, Wilde, PD8136 Ian, Williams, PD8142 Norma, Williams, PD8150 Philip, Young, PD8119 Marie-Claire, Young, PD8113								lead to more vehicles on the network. The proposal does not take into consideration the use of drones, driverless cars and virtual trains in the future.			lead to more vehicles on the network. The proposal does not take into consideration the use of drones, driverless cars and virtual trains in the future.		constrained by the presence of protected archaeological remains of a wooden wagonway to the west and encapsulated contaminated ground conditions as a result of historic cokeworks to the east. There is no available alternate alignment for the road. The road will support housing and employment regeneration and improve connectivity in the Coalfield. Developer contributions will be sought to fund completion of this road. Further justification for this Policy is set out in the Compliance Statement. The Council considers this Policy to be sound.	
Paul	Dixon	Highways England	PD4850	Policy	SP10	Object		Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.			Highways England considers the Plan not be sound as the transport and infrastructure evidence base which will be prepared by HE is incomplete. Therefore, in order to make the policy sound Highways England needs to be fully assured that the individual and cumulative impacts of the Plan's proposed development and the requirements of new and improved transport infrastructure is fully assessed and understood, with particular regard to the Strategic Road Network. Provided clarification can be provided prior to the commencement of the hearing sessions and the Infrastructure Study can be updated and completed then we should be in a position to withdraw this representation and provide full support to the Plan.	No proposed modifications.	Following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850), the Council and Highways England have worked together to identify the mitigation measures required within the Plan period. As a result of this work, the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP. Consequently, Highways England have revoked their objection to the Plan and both parties have agreed to continue to work together to prepare a Memorandum of Understanding.	Policy SP10 iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP; 12.6 - The delivery of SSTC 4 will better manage traffic to and from the A19 and assist in managing potential queuing on the SRN off slip roads at the Wessington Way junction. The Council will continue to work with Highways England to deliver a junction improvement scheme at the Wessington Way junction with the A19. This scheme, along with the delivery of the full length of SSTC 4, aim to control and manage traffic flow on the local road network, with the specific intention of helping to better manage traffic flow on the SRN. The Council will also consider the delivery of new links on the local road network to mitigate capacity and safety concerns with the A19. Any proposals and delivery timescales will be agreed through a Memorandum of Understanding (MOU) with both parties. 12.8 The efficient operation of both the local and Strategic Road Network (SRN) (A19 and A194(M)) is vital to support the growth and long term viability of the Sunderland economy whilst also limiting the environmental effect of excessive congestion and minimising road safety concerns. In conjunction with Highways England it is anticipated that in the future a number of key junctions on the SRN will require improvement by major schemes, notably the A19 junctions with the A1231, A183 and the A690. In addition, traffic growth will result in traffic constraints on the A19 itself and widening of some sections will also be required. Nevertheless, whilst supporting improvements to the SRN highway infrastructure is important, managing existing and future

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															commuting patterns and reducing congestion by improved public transport provision and implementation of more travel planning management measures to reduce single car occupancy is essential. Working together, the Council and Highways England will also, during the lifetime of the plan, identify potential schemes to address capacity and road safety concerns on the SRN.
Nick	Horsley	Mineral Products Association	PD4433	Chapter	12	Support with mods						No indication is given of the likely resource requirements to deliver the infrastructure planned. The evidence base should include a resource assessment of the development needs and aspirations of the plan.	Update the evidence base to include a resource assessment of the development needs and aspirations of the plan.	The Maintaining Levels of Minerals Supply Topic Paper and Local Aggregates Assessment which form part of the evidence base provide an indication of the likely resource requirements. The Council will continue to work with neighbouring authorities on mineral planning issues through the North East Aggregates Working Party and will allocate any necessary sites through the A&D Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed
Karen	Jones		PD9	Policy	SP10	Object					Objection on the grounds that the population evidence base is double counting jobs and workers, and the Green Belt evidence base does not provide exceptional circumstances for each site to be released from the Green Belt. In addition Green Belt (HGA) sites will not meet the need for affordable housing provision or target the needs of the ageing population, the executive housing offer is likely to result in unacceptable pressure on an already congested road network, brownfield sites have not been exhausted as potential sites for housing, school provision is at capacity, and the five purposes of the Green Belt are compromised.	Objection on the grounds that the population evidence base is double counting jobs and workers, and the Green Belt evidence base does not provide exceptional circumstances for each site to be released from the Green Belt. In addition Green Belt (HGA) sites will not meet the need for affordable housing provision or target the needs of the ageing population, the executive housing offer is likely to result in unacceptable pressure on an already congested road network, brownfield sites have not been exhausted as potential sites for housing, school provision is at capacity, and the five purposes of the Green Belt are compromised through their release.	Suggest the plan is not legally compliant or sound and needs to be rejected.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. The Council has prioritised the development of brownfield sites, however there is an insufficient supply of deliverable brownfield sites to meet the housing requirement, the Council therefore consider that exceptional circumstances exist to amend Green Belt boundaries to accommodate this growth. Further detail is set out within the Exceptional Circumstances report and the Compliance Statement. The plan includes policies which seek to deliver affordable housing and accommodation for older people.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Peter	Sissons		PD718	Policy	SP10	Object			Object to creation of Central Route through Elba Park, which would split the parkland, adversely affect wildlife, sever walking and cycling routes and ultimately lead to more traffic congestion.			Object to creation of Central Route through Elba Park, which would split the parkland, adversely affect wildlife, sever walking and cycling routes and ultimately lead to more traffic congestion.	Remove the policy altogether from the plan.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Anthony	Erskine		PD131	Policy	SP10	Object					Objection on the grounds that the proposed road would result in loss of Green Flag park land, protected species and their habitats	Objection on the grounds that the proposed road would result in loss of Green Flag park land, protected species and their habitats	Suggest re-routing the road to the outskirts of the park following the railway lines.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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											and publically accessible green space. Also object to loss of park land as it is located in an area of high deprivation and high mental health issues and public access to parks for physical exercise can support emotional and mental wellbeing. Suggest road be re-routed via the outskirts of the park following the railway lines.	and publically accessible green space. Also object to loss of park land as it is located in an area of high deprivation and high mental health issues and public access to parks for physical exercise can support emotional and mental wellbeing. Suggest road be re-routed via the outskirts of the park following the railway lines.		permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings, that will help to minimise severance within the Park in terms of wildlife and recreational movements.	the Plan. Therefore no modifications are proposed.
Darren	Ord		PD8	Policy	SP10	Object			Objection on the grounds of concerns regarding the Central Route road and the threat to wildlife, increased speeding traffic, increased noise and proximity to existing Elba Park development.		Objection on the grounds of concerns regarding the Central Route road and the threat to wildlife, increased speeding traffic, increased noise and proximity to existing Elba Park development.	Suggests the traffic in the area is not of significance to warrant a new road and will cause permanent damage to the wildlife and wellbeing of residents. David Wilson Homes failed to inform potential residents of this road.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Richard	Harrison		PD2	Policy	SP10	Object					Objection on the grounds that a local search with the Council raised no record of a new road when purchasing a property at Elba Park and developing the road will result in damage to the park, loss of wildlife and reduction in house prices.	Suggests cancelling the plans to build a road through the park and look to re-route using the old railway line.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Ella	Fielding		PD134	Policy	SP10	Object	Objection on the grounds that there are alternative routes that the highway could take, loss of 2018 Green Flag park/green space used by families, and loss of wildlife and protected species/habitats. Object to the unsound assertion that the new highway will encourage cyclists and walkers. Object to the over capacity of the A19 and A1 as the policy will seek to add to the over capacity. Failure to working with Durham County Council to agree an alternative route around Elba Park.	Objection on the grounds that there are alternative routes that the highway could take, loss of 2018 Green Flag park/green space used by families, and loss of wildlife and protected species/habitats. Object to the unsound assertion that the new highway will encourage cyclists and walkers. Object to the over capacity of the A19 and A1 as the policy will seek to add to the over capacity. Failure to working with Durham County Council to agree an alternative route around Elba Park.		Object on the grounds that the plan is not consistent with NPPF paragraph 87 which states that Green Belt land must only be developed in exceptional or special circumstances and there is no other land available.	Objection on the grounds that there are alternative routes that the highway could take, loss of 2018 Green Flag park/green space used by families, and loss of wildlife and protected species/habitats. Object to the unsound assertion that the new highway will encourage cyclists and walkers. Object to the over capacity of the A19 and A1 as the policy will seek to add to the over capacity. Failure to working with Durham County Council to agree an alternative route around Elba Park.	Suggests Sunderland Council work jointly with Durham City Council to agree a route which goes around the 2018 Green Flag Elba Park instead of directly through it; and the Council should work to invest in the existing roads to make them suitable for the existing level of traffic	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Louise	Cumming		PD141	Policy	SP10	Object			Miss Cummings objects to the road proposed from the A182 to Fencehouses on the grounds of		Miss Cummings objects to the central route (road proposed from the A182 to Fencehouses) on the	No Modification proposed.	The Council considers this policy to be sound. The Coalfield Regeneration Route is a longstanding commitment of the Council. It is included in the UDP and has a partially implemented	The Council considers there have been no soundness or legal compliance issues raised by this	

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									loss of park land with Green Flag status, loss of protected species' habitats and increased pollution, particularly in an area of high deprivation and mental health related issues where public access to greenspace can help such conditions.			grounds of loss of park land with Green Flag status, loss of protected species' habitats and increased pollution, particularly in an area of high deprivation and mental health related issues where public access to greenspace can help such conditions.		planning permission. The alignment is proposed as such to maximise the land available for housing at the Elba Park site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements. It is constrained by the presence of protected archaeological remains of a wooden waggonway to the west and encapsulated contaminated ground conditions as a result of historic cokeworks to the east. There is no available alternate alignment for the road. The road will support housing and employment regeneration and improve connectivity in the Coalfield.	representation which require modifications to the Plan. Therefore no modifications are proposed.
Steve n	Harrison		PD234	Policy	SP10	Object	Objection to the central route's location/positioning which will divide a park and result in loss of habitat and wildlife and recreation/exercise areas. In addition, object to the transparency of the text within the document describing the central route.						Suggest removing description as it is misleading.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Claire	Howells		PD130	Policy	SP10	Object			Objection to the central route (A182 Biddick Woods/Sedgelech) on the grounds that it is incompatible with point 2.64 and SP10 in the Plan and the roads not being congested.				No Modification proposed.	The Council considers this policy to be sound. The Coalfield Regeneration Route is a longstanding commitment of the Council. It is included in the UDP and has a partially implemented planning permission. The alignment is proposed as such to maximise the land available for housing at the Elba Park site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements. It is constrained by the presence of protected archaeological remains of a wooden waggonway to the west and encapsulated contaminated ground conditions as a result of historic cokeworks to the east. There is no available alternate alignment for the road.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sophie	Smith		PD135	Policy	SP10	Object			Objects to Central Route proposal which would split Elba Park in two and would adversely affect wildlife.			Objects to Central Route proposal which would split Elba Park in two and would adversely affect wildlife.	SP10 needs to be removed from the plan.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sarah	Treadwell		PD13	Policy	SP10	Object					Objects to inclusion of central route section of Coalfield Regeneration Route within Policy SP10. This would damage the green	Objects to inclusion of central route section of Coalfield Regeneration Route within Policy SP10. This would damage the green	Consider alternative alignment alongside the Leamside Line.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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											flag park, which the Council state they are trying to protect. The green space contains a range of wildlife. The park provides support for health and wellbeing, physical exercise and educational visits. There are no traffic and congestion issues which justify the need for the new road. The Council should look at an alternative alignment alongside the old railway lines.	flag park, which the Council state they are trying to protect. The green space contains a range of wildlife. The park provides support for health and wellbeing, physical exercise and educational visits. There are no traffic and congestion issues which justify the need for the new road. The Council should look at an alternative alignment alongside the old railway lines.		permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	the Plan. Therefore no modifications are proposed.
Kenneth	Treadwell		PD14	Policy	SP10	Object					Objects to Policy SP10 particularly the central route section of coalfield regeneration route which is planned to run through Elba Park. It is a green flag park which the council says it is trying to protect and a refuge for wildlife.	Objects to Policy SP10 particularly the central route section of coalfield regeneration route which is planned to run through Elba Park. It is a green flag park which the council says it is trying to protect and a refuge for wildlife.	Use an alternative alignment such as Leamside Line which would have less impact on park but offer improved road network.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Paul	Dellow		PD140	Policy	SP10	Object	Mr Dellow objects to the road proposed from the A182 to Fencehouses on the grounds of loss of park land with Green Flag status, loss of protected species' habitats and increased pollution, particularly in an area of high deprivation and mental health related issues where public access to greenspace can help such conditions.		Mr Dellow objects to the road proposed from the A182 to Fencehouses on the grounds of loss of park land with Green Flag status, loss of protected species' habitats and increased pollution, particularly in an area of high deprivation and mental health related issues where public access to greenspace can help such conditions.		Mr Dellow objects to the road proposed from the A182 to Fencehouses on the grounds of loss of park land with Green Flag status, loss of protected species' habitats and increased pollution, particularly in an area of high deprivation and mental health related issues where public access to greenspace can help such conditions.	No Modification proposed.	The Council considers this policy to be sound. The Coalfield Regeneration Route is a longstanding commitment of the Council. It is included in the UDP and has a partially implemented planning permission. The alignment is proposed as such to maximise the land available for housing at the Elba Park site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements. It is constrained by the presence of protected archaeological remains of a wooden waggonway to the west and encapsulated contaminated ground conditions as a result of historic cokeworks to the east. There is no available alternate alignment for the road.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Paul	Skinner		PD8500	Chapter	12	Object			Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.		Objects to the Plan on the grounds that consultation was inadequate. Lack of basic facilities available at Seaburn including toilets, public transport, wheelchair access and cycling provision. Objects to bus services no longer using Park Lane Interchange and traffic calming measures along the seafront and recommends that some traffic light timings are adjusted. There is scope to develop brownfield sites rather than Green Belt and greenfield sites. Objects to the term safeguarded land.	Development should be focussed on brownfield sites and be for bungalows and affordable housing, not multi-storey units and executive housing. Basic facilities should be maintained at Seaburn and public transport links improved. Vaux site should be used to provide a walking and cycling link from the harbour, not offices. The affordable housing requirement should be raised to 50% instead of 15%.	Numerous rounds of consultation have been undertaken by the Council which have exceeded the minimum requirements set out within legislation and the adopted Statement of Community Involvement. Many of the issues raised are non-strategic, and can be reviewed as part of the Allocations and Designations Plan. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt boundary, as set out within the Exceptional Circumstances Report. The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained with the SHMA Addendum 2018. Further justification is set out within the Compliance Statement. The Council has set out its approach to the SHLAA and identifying sustainable housing sites in Policy SP1, which addresses the approach in relation to the viable use of brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
KENNETH	ROBSON		PD10	Policy	SP10	Object					Objects to the proposed Central Route section of the Coalfield Regeneration Route in Policy SP10 on the	Remove or amend Policy SP10 to remove the Central Route section of the Coalfield Regeneration Route	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The	The Council considers there have been no soundness or legal compliance issues raised by this representation which	

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												grounds that it would remove a leisure area, route traffic through a wildlife haven and destroy habitat. If a road is required the Leamside Line alignment should be used.	or choose an alternative alignment that does not destroy the leisure facilities and Elba Park.	alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings, that will help to minimise severance within the Park in terms of wildlife and recreational movements.	require modifications to the Plan. Therefore no modifications are proposed.
Neil	Cole	South Tyneside Council	PD4451	Chapter	12	Support							No modification proposed	The Council will continue to work with South Tyneside as part of the Duty to Cooperate. Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2753	Policy	SP10	Support						Support Policy SP10 and the delivery of the Ryhope to Doxford Park Link Road.	No modifications proposed.	The Council notes this representation.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
	Unknown	Harworth Estates	PD2017	Policy	SP10	Support						Support safeguarding of Leamside Line. There is agreement with Network Rail to connect the Leamside Line to the national rail network at Pelaw and there is a working group established to consider this.	No modifications proposed.	The Council note this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1335	Policy	SP10	Object		The policy should be more positive in light of how the Leamside Line could be re-used in future. There is no mention of how the Durham Coast line could be improved. In terms of walking and cycling, there is only broad commitment to "improve and extend" which appears weak given the detail given to the highway schemes mentioned in the policy.			The policy should be more positive in light of how the Leamside Line could be re-used in future. There is no mention of how the Durham Coast line could be improved. In terms of walking and cycling, there is only broad commitment to "improve and extend", which appears weak, given the detail given to the highway schemes mentioned in the policy.	The Policy needs to be more positive and include more details on rail schemes and on walking and cycling.	Policy SP10, point 4 sets out that the Council will support improvements to the Metro and rail network including new stations and routes where deliverable. It is considered that any future improvements to the Durham Coast Line would be supported by this part of the policy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Kristina	Roberts		PD8100	Policy	SP10	Object	Object to Policy SP10 particularly the inclusion of a road through Elba Park. The development of the road would split a park into two and reroute heavy traffic between Industrial Estate Motorways and family homes. It is unclear if evidence has been prepared to justify the road, for example traffic surveys.	Object to Policy SP10 particularly the inclusion of a road through Elba Park. The development of the road would split a park into two and reroute heavy traffic between Industrial Estate Motorways and family homes. It is unclear if evidence has been prepared to justify the road, for example traffic surveys.					The reference to a road through Elba Park should be removed.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings, that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1395	Policy	SP10	Support			Welcome the safeguarding of the Leamside Line in Sunderland which complements the safeguarding of this line through the				No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to

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									emerging County Durham Plan.						the Plan. Therefore no modifications are proposed.
Peter	Coyne		PD12	Paragraph	12.6	Object			Mr Coyne objects to the Coalfield road link to the A182 due to concern for impacts on the natural beauty of Elba Park, increases in air pollution, reduction in wildlife and danger to children.		Mr Coyne objects to the Coalfield road link to the A182 due to concern for impacts on the natural beauty of Elba Park, increases in air pollution, reduction in wildlife and danger to children.	Mr Coyne objects to the Coalfield road link to the A182 due to concern for impacts on the natural beauty of Elba Park, increases in air pollution, reduction in wildlife and danger to children.	Mr Coyne proposes reusing the old railway line which is far away from existing housing and parks.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
David	Caslaw		PD4	Paragraph	12.9 & 12.10	Support							No Modification proposed.	Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Mary	Peel		PD8432	Policy	ST2	Object			Concern that removal of sites HGA 1,2 &3 from the Green Belt will be in direct conflict with policy SS3, section 2.		Concern that removal of sites HGA 1,2 &3 from the Green Belt will be in direct conflict with policy SS3, section 2.	Concern that removal of sites HGA 1,2 &3 from the Green Belt will be in direct conflict with policy SS3, section 2.	No Modification proposed.	The Council considers this Policy to be sound. The Council considers there to be exceptional circumstances which justify amendments to the Green Belt and the removal of HGA 1,2 and 3 from the Green Belt, as set out within the Exceptional Circumstances Report. Policy SS3, section 2 relates to safeguarded land, which is land that is removed from the green belt but designated as safeguarded land to meet the likely longer term development needs (beyond the plan period). Safeguarded land can only be released for development through a review of the Plan. The HGA sites within the plan are allocations required for the needs within the plan period and are to be removed from the green belt on adoption of the plan and not safeguarded sites.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Barbara	Hooper	Historic England	PD115	Policy	ST1	Support						Historic England welcomes 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.	No modification proposed	The Council considers this policy to be sound. The Council has agreed a Statement of Common Ground with Historic England (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Laura	Roberts	Northumbrian Water	PD2714	Policy	ST2	Support with mods			It is considered that Policy ST2(2) as worded in not effective as it will be achievable in every instance.				In relation to Policy ST2 (2) Criterion iii, the following amendment to make the policy effective: "where an existing access is to be used, substandard accesses will be, if possible, improved and/or upgraded in accordance with the current standards for road;"	The Council considers this policy to be sound. The inclusion of the wording 'if possible' to ST2 (2) criterion iii, would weaken the policy requirement and potentially have a detrimental impact on the local road network.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
S, Abrahams, PD5761 E, Adams, PD5065 Vicky, Adgar, PD4923 Dorrian, Affleck, PD2526 P, Aitken, PD1500 K, Aitken, PD870 George Edward, Alberts, PD3328 Paul, Aldridge, PD3457				Policy	ST2	Object		Object to the policy as it is considered to be at odds with Policies SS2 and SS3 as development at Springwell would have unacceptable adverse impacts on	Object to the policy as it is considered to be at odds with Policies SS2 and SS3 as development at Springwell would have unacceptable adverse impacts on		Object to the policy as it is considered to be at odds with Policies SS2 and SS3 as development at Springwell would have unacceptable adverse impacts on	Object to the policy as it is considered to be at odds with Policies SS2 and SS3 as development at Springwell would have unacceptable adverse impacts on	No proposed modification.	A Transport Assessment has been prepared for all HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no

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Callum, Aldridge, PD1992 Dominic, Aldridge, PD1990 Alison, Aldridge, PD2035 Riley, Allen, PD4145 Olivia, Allen, PD4626 Susan, Alnwick, PD5210 Alan, Alnwick, PD5480 Alistair, Amour, PD5358 George, Anderson, PD3153 Caroline, Anderson, PD3199 Ava, Anderson, PD3137 George Noah, Anderson, PD3178 Gary, Anderson, PD3410 Carolyn, Anderson, PD2271 W, Ankers, PD2065 Paul, Appleton, PD5871 K H, Appleton, PD4146 Joan, Armstrong, PD4763 Clem, Armstrong, PD2130 Joan, Ashman, PD2988 A, Askew, PD2540 A, Askew, PD2587 Michelle, Aubert, PD4269 Carol, Baggaley, PD739 Paul, Balmer, PD1730 Tracy, Balmer, PD1729 Margaret, Banks, PD6040 Dan, Banning, PD2684 Matt, Banning, PD2539 Alan, Barber, PD2205 Ann, Barber, PD5733 Samantha, Barker, PD4184 Sandra, Barker, PD3961 Kenneth, Barker, PD4187 William, Barker, PD5867 Adam, Barnes, PD5232 Alison, Barnes, PD5767 E, Barrass, PD327 M, Barrass, PD331 A, Barrett, PD5457 Amanda, Barron, PD4652 Sheila, Barron, PD4651 Linda, Barron, PD4741 Malcolm, Barron, PD4758 Alice, Barron, PD5765 Amelia, Bateman, PD335 Deborah, Bateman, PD347 John, Bateman, PD2652 Jean, Bateman, PD2651 Peter, Beal, PD4953 Gillian, Beal, PD4940 H M, Bechkok, PD2453 AM, Bechkok, PD2467 Kimberly, Beckwith, PD3416 John, Bell, PD3145 Sheila, Bell, PD3142 I, Bell, PD5400 Angela, Bell, PD1867 Edna, Bell, PD4438 Alan, Bell, PD4430 S, Bell, PD3823 Steve, Bell, PD2824 Frances, Bell, PD3803 Catherine, Bell, PD1785 Nicci, Best, PD8503 Sally, Best, PD1076 Robert, Best, PD3076 Nick, Best, PD3665 Donna, Bishop, PD875 Christopher, Bishop, PD910 Wendy, Black, PD5781 George, Black, PD2152 Patricia, Black, PD1874 Deborah, Blackett, PD4985 David, Blackett, PD1563 Andrew, Blackett, PD1319 Emma, Blackett, PD3986 Fay, Blackie, PD5322 Michelle, Bland, PD2113 Simon, Bland, PD3226 Robert, Bloomfield, PD4380 Sharon, Bloomfield, PD4408 Lilian, Blue, PD1307 Frank, Blue, PD4757 Susan, Booker, PD1586 Howard, Booker, PD1570 Andrew D, Bosworth, PD342 Michelle, Bosworth, PD354 Angela, Bowe, PD3712 Kevin, Boyd, PD4932 Jennifer, Boyd, PD4147 Jennifer, Boyd, PD946 Nikki, Boyle, PD2927 A M, Bradford, PD2595 T E, Bradford, PD2584 Rebecca, Bradley, PD3713 Helen, Brady, PD6005 Tilly, Brady, PD3166 Stephen, Brady, PD3126 Marley, Brady, PD3967 Lee, Brebner, PD1944 Terry, Brereton, PD2154							the Local Road Network.	the Local Road Network.		the Local Road Network.	the Local Road Network.		not only by private cars but for people on foot and bicycle as well. The Assessment recommends that these sites are deliverable and will not have an unacceptable impact on the local or strategic network. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which includes contributions for highways and public transport amongst other infrastructure. Further justification can be found in the above evidence base documents and relevant Compliance Statement. The Council considers the Policy to be sound.	modifications are proposed.

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Elisabeth, Brereton, PD2034 Kevin, Bricknall, PD361 Lynn, Bricknall, PD370 Mildred, Brodie, PD2452 ARTHUR, BRODIE, PD2435 Will, Brooke Lovell, PD6014 Evie, Brooke Lovell, PD6026 Carrie Ann, Brooke-Lovell, PD5858 M, Brooks, PD5079 Kristan, Brown, PD5671 Katherine, Brown, PD2874 Malcolm, Brown, PD4165 Matthew, Brown, PD2860 Alexandra, Brown, PD2915 Steven, Brown, PD2831 T, Brown, PD5162 Mary, Brown, PD6050 Dave, Brown, PD4057 Susan, Brown, PD5623 David, Brown, PD2493 Kenneth, Brunger, PD2089 Maurice, Bryson, PD3779 Jenna, Buglass, PD375 Gary, Bunt, PD5330 John, Burlinson, PD381 G, Burn, PD4442 F, Burn, PD4514 Carly, Burnett, PD909 Keith, Burnett, PD4070 Kathleen, Burns, PD996 Peter, Burns, PD3370 M, Burrows, PD2909 Paul, Burrows, PD2895 Jorja, Burrows, PD2949 Mitchell, Butler, PD2546 Stephen, Butler, PD393 Christine, Butler, PD387 Gary, Cairns, PD2944 Keith, Cameron, PD3338 Jacqueline, Cameron, PD3314 Vera, Carr, PD1864 Ada, Carr, PD4531 Peter, Carr, PD4925 W, Carrick, PD3224 Kathleen, Carroll, PD2817 Mary, Cartwright, PD1607 Peter, Cartwright, PD1491 Michael, Caruana, PD4133 Samantha, Carver, PD4235 Rachel, Chadwick, PD1309 Daniel, Chadwick, PD1314 Laura, Chambers, PD4294 Dorothy, Chandler, PD1942 Frank, Chandler, PD1909 Robert, Charlton, PD4811 Sarah, Charlton, PD4724 G, Chicken, PD2891 Ingrid, Chidgey, PD403 R W, Chilton, PD3832 Joan, Chilton, PD3933 Colin, Clark, PD2406 Maria, Clark, PD2495 M, Clark, PD2768 Brian, Clarke, PD422 Gina, Clarke, PD427 Victoria, Clayton, PD2162 Deborah, Clayton, PD1866 Ian, Clayton, PD2203 Lynn, Clayton, PD2112 Sophie, Cleasby, PD2537 A, Clements, PD2767 N D, Clements, PD2693 Marion, Coats, PD2420 Ron, Codling, PD3780 BM, Codling, PD3527 Alan, Coleclough, PD5135 Dorothy M, Coleclough, PD3591 James, Colledge, PD3091 Muriel, Colledge, PD3056 Alice, Colligan, PD4824 Elizabeth, Collins, PD3075 Laura, Condren, PD5427 Peter, Condren, PD5438 Olive, Cook, PD2629 Gemma, Cooke, PD4297 David, Cooper, PD2164 Evelyn, Cooper, PD1719 William, Cooper, PD3459 Carolyn J, Cooper, PD5365 Dave, Cooper, PD3260 Samuel, Cooper, PD432 Dawn, Cooper, PD3259 R L, Cooper, PD3520 Margaret, Copeland, PD2945 M, Corrigan, PD2047 Peter, Cottle, PD4946 Sara, Coulson, PD4573 Frances, Cowie, PD2880 Nicola, Cowie, PD1170 Niamh, Cowie, PD939 Hannah, Cowie, PD2482 Neil Edward, Cowie, PD2466														

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Melanie, Craig, PD5837 Dean, Craig, PD4810 Linda, Cryan, PD1110 J D, Cullen, PD3341 P W, Cullen, PD3299 P J, Cullen, PD2562 Beth, Cullen, PD5134 Richard, Curtis, PD5707 SARAH, CURTIS, PD5644 I, Dalby, PD1380 T, Dalby, PD1574 Anna, Dalby, PD4116 Steven, Dalby, PD3848 Imogen, Dalby, PD3873 Charlotte Elizabeth, Dalby, PD4122 M, Dawson, PD3000 A, Dawson, PD6024 Violet, Denham, PD442 Len, Denham, PD437 Dean, Derbyshire, PD5485 Joe, Devannney, PD453 Angela, Devannney, PD448 Jonathan, Dewart, PD2090 Bill, Dick, PD458 Christine, Dick, PD464 Ann, Dinning, PD5151 Alan, Dinning, PD5032 Sam, Dinsley, PD1572 Susan, Dinsley, PD1550 Shaun, Dinsley, PD1527 Brenda, Dodd, PD6039 E, Dodds, PD5440 J, Dodds, PD1665 John, Donnison, PD4947 Angela, Dover, PD5882 Keith, Dover, PD5878 John, Dowson, PD4293 Theo, Drummond, PD4679 Oliver, Drummond, PD4621 Kristopher, Drummond, PD5874 Kelly, Dryden, PD3587 Antony, Dryden, PD3781 Coel, Dryden, PD3783 Rhys, Dryden, PD3917 Katie, Dunbar, PD470 Kevin, Dunn, PD5105 Brian, Dunn, PD5701 Denise, Dunn, PD5663 Robert M, Edgar, PD3353 Patricia M, Edgar, PD3343 Vicki, Edmunds, PD4336 Janine, Edworthy, PD3209 Ian, Edworthy, PD5299 Bridget, Edworthy, PD3054 Miranda, Edworthy, PD3264 Paul, Ehrhardt, PD2327 Dianne, Ellwood, PD3144 William, Evans, PD5508 Joan, Evans, PD2575 Deborah, Ewart, PD4657 Kate, Ewart, PD5146 Stephen, Ewart, PD4650 Eleanor, Ewart, PD5164 James, Ewing, PD4384 Edward, Failes, PD1315 Maureen, Failes, PD1460 Amy, Falcus, PD3641 Craig, Falcus, PD3528 K, Faulkner, PD2706 N J, Faulkner, PD2727 Stephen, Fay, PD3833 Pauline, Fenwick, PD956 Colin, Fenwick, PD1059 David Alan, Fenwick, PD1311 Lynn, Fenwick, PD1346 Ronald, Ferguson, PD2153 E, Fife, PD4887 Amy, Fife, PD4917 Grahame, Fife, PD4918 Mark R, Fife, PD2496 Julie, Fife, PD2615 Adam, Finch, PD4871 Terry, Firman, PD1084 James Donnison, Fletcher, PD1172 O, Fletcher, PD1037 D, Flinn, PD6003 C A, Flinn, PD5966 R, Florance, PD1464 Heather, Florance, PD5835 Neil, Foggin, PD4828 Sandra, Foggin, PD2273 DW, Foggin, PD2232 Jacquelin, Foggin, PD4922 Brenda, Foote, PD3903 Richard, Foreman, PD5227 Jeannette, Forrester, PD6038 J, Forster, PD2504 Sonia, Forster, PD3919 David, Forster, PD3988 Heather, Forster, PD475 Steven, Forster, PD5954 Janine, Forster, PD1587														

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<p>Elsie, Foster, PD3822 Cliff, Fothergill, PD4639 Elaine, Fothergill, PD4563 Stacie, Fothergill, PD4549 Hazel, Framingham, PD481 Heather, Francios, PD4532 Kenneth, Francios, PD4582 Isabel, Franklin, PD5321 Mark, Franklin, PD5158 Peter, Franklin, PD4052 M, Freeman, PD1930 JG, French, PD835 V, French, PD853 P, Gale, PD6006 Deborah, Gallagher, PD1133 John, Gallagher, PD2227 Tom, Gallagher, PD2360 John, Gallagher (Senior), PD2330 Katrina, Garnett, PD3782, Linda, Garnett, PD3066, Ronald, Garnett, PD2655, S, Garrett, PD2586, D, Garrett, PD1652, Craig, Gartland, PD3937, Emma, Gatens, PD1688, Mark, Gatens, PD1653, James, Gatens, PD2369, Amelia, Gatens, PD2161, Dawn, Gault, PD4210, Chris, Gibson, PD4252, Ravender, Gill, PD3521, Zac, Gillbanks, PD5706, Ann Marie, Gillbanks, PD5590, Julie, Giloney, PD4427, M E, Glaister, PD2407, Lesley, Godfrey, PD5277, Julie, Goding, PD4284, Keeley, Gordon, PD487, Phil, Gordon, PD492, Christine, Goss, PD4492, Sarah, Gough, PD3739, David, Grady, PD3329, Janice, Graham, PD497, Colin, Gransbury, PD2229, Irene, Gransbury, PD2228, Carl John, Grant, PD504, Margaret Ann, Grant, PD509, Peter Alexander, Grant, PD5231, Ann Mildred, Grant, PD2975, Ronald Malcolm, Grant, PD2892, Paul, Gray, PD2280, Chris, Green, PD1245, Jean, Green, PD3529, Philip, Greenup, PD1993, Catherine, Greenup, PD1994, Kate, Gregory, PD5530, Ben, Gregory, PD5593, Josh, Grey, PD5491, Stuart, Griffiths, PD4343, Lucy, Griffiths, PD4552, Claire, Guy, PD4759, Susan, Hall, PD1435, Adam, Hall, PD5066, Stephen, Hall, PD4409, Roslyn, Hall, PD4441, Julie, Hall, PD2691, Jonathan, Hall, PD1913, Maureen, Hamilton, PD1373, Elaine, Hamilton, PD1372, Valerie, Hancock, PD2411, John, Hancock, PD5214, Joanna, Hand, PD519, Christopher, Hand, PD514, Denise, Hannan, PD524, Jake, Hannan, PD1943, Mark, Hannan, PD1821, Paul, Hanson, PD3235, Louise, Hanson, PD3279, Stuart, Harding, PD2457, Michael, Harding, PD5302, Michael, Harding, PD5301, Sophie, Harding, PD2333, Emma, Hardy, PD2683, Angela, Hardy, PD2458, Adam, Harper, PD2235, Lisa, Harris, PD3583, Ian, Harris, PD3585, Paul, Harris, PD2119, Anna Marie, Harris, PD3581, Gillien, Harris, PD1829, Janet, Harrison, PD2972, Andrew, Hartley, PD3482, Naomi, Hartley, PD3461, Aurora, Hartley-Hewitson, PD5766 Lynn, Hartridge, PD3666, Allen, Hartridge, PD1759, Demi, Hawyes, PD531, Margaret, Haywood, PD5087, Nigel, Hems, PD4725, E, Henderson, PD3354, Gemma, Henderson, PD3827, K, Hepburn, PD3924,</p>														

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Wendy, Hewitson, PD3431, Kasia, Heywood, PD2272, Philip, Higgins, PD4862, David, Higgins, PD3775, Pauline, Higgins, PD3750, Geoffrey, Higgins, PD3733, R, Hillier, PD1119, E, Hillier, PD3332, Callum, Hills, PD2300, Karen, Hills, PD3090, Kenneth, Hills, PD3262, Michael, Hills, PD2107, Caroline, Hills, PD3092, Michelle, Hills, PD2357, Andy, Hird, PD3072, Ruth, Hirst, PD4731, Margaret, Hodgson, PD1371, Elizabeth, Hogg, PD4072, Michael, Hogg, PD5136, Paris, Holland, PD5836, Janice, Holmes, PD4593, Rhiannon, Holmes, PD4345, Trevor, Holmes, PD4347, Bill, Holmes, PD5492, S M, Holt, PD1316, Allen, Hope, PD1264, Ryan, Hope, PD2650, Andrea, Hope, PD5528, Elonor, Horne, PD2516, Sarah, Horne, PD1619, Joyce, Horne, PD1709, Gary, Horne, PD3516, David, Horrigan, PD2986, Sarah, Horrigan, PD2827, Jane, Horrigan, PD2825, Keith, Horrigan, PD2987, Norma, Houghton, PD3225, Stephen, Houghton, PD1744, Amelia, Hudson, PD3077, Stephen, Hudson, PD3639, Isabella, Hudson Walker, PD537, Marc, Hughes, PD8317, Nicola, Hurst, PD1784, Jess, Illingworth, PD2635, David, Ingram, PD4030, Sue, Ingram, PD4010, E, Irwin, PD2459, Robert, Jackson, PD4486, Donna, Jackson, PD4468, Stella, Jacques, PD656, W, Jacques, PD2614, Mark, Jahn, PD2040, Janet, Jamieson, PD2581, Norman, Jamieson, PD2578, M A, Jennings, PD1908, John, Jennings, PD5694, J, Jeruskau, PD4320, Alma, Jobling, PD3531, L, Jobling, PD1109, D, Jobling, PD1094, Peter, Jobling, PD4488, Gavin, Johnson, PD5027, Robert, Johnson, PD5782, Mavis, Johnson, PD2695, Catherine, Johnson, PD4295, Relia, Jonas, PD5983, SA, Jones, PD5888, L, Jones, PD5784, Jensen, Jones, PD3586, Elliot, Jones, PD3664, Sarah, Jordison, PD4055, Brian, Jordison, PD4054, Ann Lorraine, Jordison, PD5988, Kristian, Judge, PD542, Linda, Judge, PD547, Dennis, Judge, PD5442, Suzie, Kaszefko, PD4890, Gregory, Kaszefko, PD4606, Anisha, Kaur, PD3455, Surena, Kaur, PD3481, Francesca, Keith, PD557, Alexander, Keith, PD552, Tony, Kelly, PD5185, Claire, Kelly, PD1736, Ronan, Kenny, PD2588, Diana, Kenny, PD1228, Lisa, Kimber, PD2252, Sean, Klein, PD5529, Dennis, Lambton, PD5186, Christopher, Lane, PD4960, Caroline, Lane, PD4899, Joanne, Langley, PD5253, David, Langley, PD4865, Zack, Langley, PD5430, Katie, Langley, PD5939, Abbie, Langley, PD1336, Will, Langley, PD1404, Beth, Lawrence, PD2070, Lyn, Laws, PD3524, Victoria, Laws, PD4564, David, Leach, PD4576, Audrey, Leach, PD5838,														

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Vivienne, Lee, PD4094, M. Lewins, PD4813, W. Lewins, PD4815, Joan, Liddle, PD3980, Wendy, Lindsay, PD4185, Joanne, Lisgo, PD2419, Richard, Littlejohn, PD4760, M. Livingstone, PD2613, Michele, Llaneza, PD5963, Dan, Llaneza, PD5077, Olivia, Llaneza, PD5075, Danielle, Llaneza, PD5018, Amanda, Llaneza, PD5015, Morgan, Llaneza, PD4754, Annie, Loadman, PD3642, Alison Jane, Logan, PD5833, Stuart, Logan, PD5702, Annabel, Logan, PD5668, Rachel, Luke, PD3709, Stephen, Luke, PD3684, Richard, Lumsdon, PD5566, Gemma, Lumsdon, PD5536, Peter, Lynn, PD1410, Carol, Lynn, PD1441, Louise, Lynn, PD3640, Helen, MacKay, PD562, Frank, Maghie, PD568, Stephanie, Mallam, PD4348, Ann, Manning, PD5038, Vahik, Mardirossian, PD1026, Emily Jane, Marriner, PD574, Amy, Marshall, PD1576, Elizabeth, Martin, PD3163, Amelia, Maxwell, PD768, Magdalena, Mazurek, PD4661, Malcolm, McArthur, PD967, Margaret, McArthur, PD318, Norma, McBride, PD1520, Thomas, McBride, PD3168, Kim, McBride, PD1533, Shaun, McCaffery, PD2890, S, McCaffery, PD2784, Jacqueline, McCaffrey, PD4965, David, McCaffrey, PD4981, T. McCartney, PD5298, D E, McCartney, PD5267, David, McClerence, PD5956, Ann, McCulla, PD3728, Andrew, McCulla, PD3689, Steven, McGill, PD4053, Karen, McGill, PD4011, Lee, McGill, PD3714, Craig, McGill, PD4087, Lynn, McInnes, PD4466, R, McInnes, PD5357, F, McInnes, PD5526, Gwynneth, McIntyre, PD3268, Daniel, McIntyre, PD3283, Brett, McIntyre, PD5642, A E, McKeon, PD4884, J, McKeon, PD4886, Claire, McLean, PD3711, Gillian, McMahan, PD1478, Claire, McMillan, PD4779, Emily, McNulty, PD5717, Gillian, McNulty, PD5689, Sophie, McNulty, PD5659, Greg, McPeake, PD579, Tracy, McPeake, PD586, C, Meek, PD2092, D, Meek, PD1223, I, Metcalf, PD2946, Alan, Milburn, PD3741, Denise, Milburn, PD1680, Susanne, Miller, PD1606, Audrey, Miller, PD1050, Richard, Miller, PD3983, E.Joan, Miller, PD5020, Graeme, Miller, PD1758, Garry, Miller, PD2270, Louise, Miller, PD4367, PM, Miller, PD4001, E, Mitton, PD5073, Maureen, Monaghan, PD1760, Ron, Monaghan, PD2182, D, Moore, PD5957, Daniel, Moravansky, PD2494, Leon, Morgan, PD1067, Marian, Morgan, PD1053, V, Morgan, PD8515, Bill, Morrell, PD1462, Yvonne, Morrell, PD1461, Edith, Morris, PD4086, Andrea, Morris, PD4141, Ray, Morris, PD1378, Patricia, Morris, PD1174, David, Morris, PD788, Brian, Morrissey, PD2708, Maureen, Morrow, PD1015, Peter, Mossop, PD1863, Rhoda, Mossop, PD1860, Tim, Mount, PD1337,														

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D, Mulholland, PD1681, Jean, Mulholland, PD1726, James, Mulholland, PD1703, Lindsey, Mulholland, PD1728, G, Mullen, PD2823, J G, Mullen, PD2766, Sue, Murdy, PD5281, Clifford, Murdy, PD5725, Colin, Murison, PD3790, Elizabeth, Murison, PD3819, Erik, Murison, PD2149, Emily, Murison, PD2166, J, Murison, PD2177, M, Murison, PD4180, Daniel, Murison, PD4197, Bethany, Murison, PD4217, Kathryn, Murison, PD4247, Kelly, Murray, PD1854, Elizabeth, Myers, PD2269, George, Myers, PD2091, Iris, Myers, PD1308, C, Nelson, PD5366, Paul, Nelson, PD1868, Rachel, Nelson, PD1786, Ian, Nelson, PD5165, P, Nelson, PD5233, John, Nesbit, PD4095, Clare, Nesbit, PD4253, John, Nesbitt, PD1244, Alison, Nesbitt, PD2741, Scott, Nesbitt, PD2742, Rachel, Nesbitt, PD1443, Jordan, Nesbitt, PD2744, Conor, Nesbitt, PD2748, Stephen, Nesbitt, PD2749, Danielle, Nesbitt, PD5901, Margaret, Nesbitt, PD3218, R, Neville, PD5586, C, Neville, PD5643, Sheila, Nuttall, PD3267, Dennis, Nuttall, PD3295, Lynda, O'Leary, PD4955, Debbie, Oliver, PD5283, S, Oliver, PD3032, Elizabeth, Oliver, PD3027, Eric, Oliver, PD2981, Gwenyth, Oliver, PD2960, Melissa, Oliver, PD3397, Kevin, O'Neill, PD3643, Kevin, O'Sullivan, PD598, Elizabeth, O'Sullivan, PD592, Alan, Oxley, PD3960, P, Panther, PD5519, Grahame, Parker, PD1007, Catherine, Parker, PD1317, Keith, Parker, PD8521, Christopher, Parker, PD5219, Katie, Parker, PD5861, Fiona, Parker, PD2882, M, Parkin, PD3217, George, Parkin, PD3216, Susan, Patrick, PD8310, R, Patterson, PD1551, Daniel, Patterson, PD1222, Andrew, Patterson, PD1693, Matthew, Patterson, PD1266, Victoria, Patterson, PD1164, W A, Pattison, PD1823, E.D, Pattison, PD1822, Malachi, Payne, PD4829, Michael, Payne, PD4764, Talia, Payne, PD4226, A H, Pearce, PD3365, Joan, Pearson, PD3339, Jim, Pearson, PD3499, Amanda, Pearson, PD3663, Patricia, Peele, PD3468, Chris, Pescod, PD605, Adrian, Pickering, PD5159, Janet, Pickering, PD629, K, Pickup, PD5498, David, Pickup, PD5592, Thomas, Pickup, PD5577, Dale, Pilkington-Smith, PD1186, Sheila, Platt, PD3858, Judith, Platt, PD2388, Jeffrey, Platt, PD3886, Karen, Pooley, PD5377, Keian, Pooley, PD5946, Tazmin, Pooley, PD5829, Ryan, Pooley, PD5786, Dillion, Pooley, PD5744, John, Pooley, PD5711, Tarryn, Pooley, PD3939, William, Portsmouth, PD5764, Mark William, Portsmouth, PD5769, George, Postle, PD4546, L, Potter, PD3101, S, Potter, PD3116, N, Potter, PD5580, Samantha, Potts, PD4619, Shauni, Pringle, PD2356,														

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Janice, Pringle, PD2355, Tracey, Pyburn, PD627, Luke, Pylan, PD618, Jon, Quine, PD5234, Helen, Quinn, PD2881, Robert, Quinn, PD2769, Margaret, Quinn, PD3505, L, Rae, PD637, D, Rae, PD5373, Nicola, Rae, PD1892, Ian, Ramsay, PD3677, Wendy, Ramsey, PD646, Jacob, Ramshaw, PD5873, Rosie, Ramshaw, PD6002, Joanne, Ramshaw, PD5975, James, Ramshaw, PD3189, Rachel, Ray, PD5949, James, Ray, PD5864, K, Reay, PD1575, Laurence, Reay, PD979, Simon, Reay, PD958, Christopher, Reay, PD8522, Janet, Regan, PD2401, Lisa, Reid, PD1370, Craig, Reid, PD5044, Anne, Rennie, PD664, Michael, Rennie, PD669, Stephen, Reveley, PD778, Julie, Reveley, PD3165, Alexia, Reynolds, PD1403, Jorge, Reynolds, PD1402, Gillian, Reynolds, PD1240, Anthony, Reynolds, PD1238, Amelia, Reynolds, PD1237, Malcolm, Richardson, PD1624, Claire, Richardson, PD976, Susan, Richardson, PD1660, J, Richardson, PD1642, Katrina, Ridley, PD697, Christopher, Ridley, PD680, Julie, Ridley, PD5320, Graeme, Ridley, PD2298, Catherine, Ritchie, PD707, Robin, Ritzema, PD3423, Linda, Ritzema, PD3422, Philip, Ritzema, PD4511, William, Robertson Walker, PD743 Amie, Robinson, PD4301, Ruth, Robinson, PD3994, Maureen, Robinson, PD4602, Keith, Robinson, PD4526, Kate, Robinson, PD1995, Callum, Robinson, PD5212, Hannah, Robinson, PD4808, Nicole, Robinson, PD5441, John, Robinson, PD2813, Maureen, Robinson, PD2816, Will, Robinson, PD2814, Simon, Robinson, PD734, Peter, Robinson, PD722, Evan, Robinson, PD5016, Sharon, Robinson, PD8331, Yvonne, Robson, PD4310, Dorothy, Robson, PD2331, Owen, Robson, PD5935, Les, Robson, PD1440, Luke, Robson, PD5129, Jane, Robson, PD5817, Gordon Alan, Robson, PD5948, Lyndsey, Robson, PD5947, T, Robson, PD4199, Kenneth, Robson, PD2395, Rachael, Rodger, PD2051, Julie, Rodger, PD2049, S, Rodger, PD2048, Lindsey, Ross, PD2201, Erlinda, Ross, PD2202, Lucy, Rouse, PD1932, Charlie, Rouse, PD1991, Millie, Rouse, PD1904, Paul, Routledge, PD3420, Brian, Rowntree, PD3758, P, Rudd, PD5096, Steven, Sambers, PD4236, Joss, Savory, PD3152, Angela, Savory, PD3183, Jason, Sayers, PD4358, T, Scott, PD5620, M, Scott, PD5777, Bryan, Scott, PD2274, Madeleine, Scott-Gray, PD2632, Irene, Searle, PD819, Ronnie, Senior, PD1614, Betty, Senior, PD1615, Chris, Shaftoe, PD5431, Pauline, Shaftoe, PD6052, Tom, Shaftoe, PD1514, Suzanne, Shaftoe, PD1515, Kevin, Sheppard, PD2033, Mason, Shotton, PD2451, June, Simpson, PD3669, George, Simpson, PD4675,														

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Debbie, Simpson, PD4676, Ronald John, Simpson, PD759, Chris, Simpson, PD751, Tristan, Simpson, PD5884, Amer, Singh, PD3497, Greg, Skeoch, PD5695, Rachel, Skeoch, PD5696, Joan, Slowther, PD4728, Kenneth, Slowther, PD5981, Doreen, Smith, PD1811, Kelly, Smith, PD6190, Jordan, Smith, PD6164, John, Smith, PD1407, Joan, Smith, PD1622, Charlotte, Smith, PD3460, Raymond, Smith, PD1006, Anita, Smith, PD1270, John, Smith, PD1310, Morris, Smith, PD1810, Susan, Smith, PD1516, Ian, Stafford, PD4261, June, Stafford, PD4307, Jessica, Stafford, PD5211, Alan, Stavers, PD4453, Jayne, Steanson, PD4653, Anna, Steanson, PD4518, Olivia, Steanson, PD4611, Mark, Steanson, PD4599, Marjorie, Stephenson, PD3963, Carole, Stephenson, PD1905, Peter, Sterling, PD3547, A, Stevens, PD2016, Alan, Stoddart, PD766, Alison, Stoddart, PD5244, Irene, Stoker, PD2275, H, Stoker, PD2336, Catherine, Stokoe, PD2976, Craig, Stokoe, PD3588, Dan, Stokoe, PD3918, Matthew, Stubbs, PD4062, T, Suchecki, PD5876, David, Sunley, PD2111, Lynda, Sutton, PD4157, Paul, Sutton, PD4152, Deborah, Swaddle, PD933, Michelle, Sweeney, PD773, P, Sweeney, PD1243, Barry, Taylor, PD3369, Gordon, Taylor, PD3627, Ben, Taylor, PD3653, G, Taylor, PD805, B, Taylor, PD791, Linsey, Taylor, PD3570, Greg, Taylor, PD5399, Mollie, Taylor, PD3445, David, Taylor, PD3548, Joshua, Taylor, PD3611, Jean, Taylor, PD5355, Lynn, Taylor, PD3662, Neil, Taylor, PD1966, Joyce, Taylor, PD1953, Steve C, Templeman, PD4548, Martin, Terry, PD5768, Joyce, Tetlow, PD5356, Kathryn, Tew, PD3355, F J, Thirlaway, PD2392, I, Thirlaway, PD2393, Jeremy, Thomas, PD1135, Steve, Thomas, PD3535, Jo, Thomas, PD8527, Delice V, Thompson, PD1907, Jack, Thompson, PD4038, Angela, Thompson, PD1783, David, Thompson, PD1781, Daniel, Thompson, PD5005, Andrew, Thompson, PD5428, Claire, Thompson, PD5487, Gladys, Thompson, PD3167, Allan, Thompson, PD1739, Chris, Thomson, PD4856, Maxine, Thornley, PD5354, Heather, Thornley, PD5446, Alex, Thornley, PD5548, Leanne, Tiffen, PD3002, Eva, Tiffen, PD1070, Alan, Tiffen, PD1040, Janette, Tiffen, PD2977, Terence, Tiffen, PD3039, Darren, Tiffen, PD3766, David, Todd, PD4211, James, Tracey, PD1973, Claire, Treadwell, PD3865, Sam, Treadwell, PD3864, John, Trewhitt, PD4898, M, Trewhitt, PD1722, Leslie, Trotter, PD2353, Lewis, Tuff, PD4617, Dianne, Tully, PD4096, John, Turnbull, PD5958, Clare, Turnbull, PD831, J H, Turnbull, PD1684, Emma, Turnbull, PD2545,														

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<p>Maureen, Turnbull, PD1683, Tracy, Turnbull, PD5340, Malcolm, Turnbull, PD4251, M, Turner, PD1437, Erin, Urwin, PD844, Nancy, Urwin, PD4455, Christine, Urwin, PD2389, Ray, Urwin, PD2326, Gemma, Venus, PD1423, Martin, Venus, PD841, Carole, Vorley, PD802, Neil, Waite, PD4827, Pauline, Waite, PD6051, Jill, Waite, PD5630, Michael, Wales, PD4465, Daniel, Wales, PD4460, Debbie Jane, Walker, PD858, Florence, Walker, PD1106, Amanda, Wallace, PD752, William James, Ward, PD989, Christina, Ward, PD3009, James, Warne, PD3330, Lynne, Warne, PD2889, David, Watson, PD6023, Maureen, Watson, PD4837, H, Watson, PD1173, J, Watson, PD8533, Danielle, Watson, PD874, Joanne, Watson, PD885, Paul, Watson, PD908, Julie, Watson, PD4777, Laura, Watson, PD5493, Martin, Watson, PD5364, J T, Watson, PD4614, Veronica, Watson, PD5905, Peter, Watson, PD5489, P, Weatherburn, PD3908, Malcolm, Weatherburn, PD4500, Xenia, Webster, PD1809, Mark, Weddle, PD915, Julie, Weedy, PD1229, Helen, Weir, PD4128, David, Weir, PD4101, Eileen, West, PD2901, R A, White, PD1120, Ann, White, PD1134, D, Whitfield, PD1467, F, Whitfield, PD1457, Maureen, Whittaker, PD1025, Matty, Wild, PD5940, J, Wilkinson, PD681, K, Wilkinson, PD711, D, Wilkinson, PD726, G, Wilkinson, PD2770, Helen, Wilkinson, PD2752, M, Wilkinson, PD696, Eleanor, Williams, PD3867, Lucy, Williams, PD4097, Carl, Williams, PD4727, L, Williams, PD4550, Lee, Williams, PD920, Thomas, Williams, PD2165, Sara, Williams, PD932, Sylvia, Williams, PD2848, Brian, Williams, PD2795, Laura, Williams, PD5710, Phillip, Williams, PD5013, Katie, Wilson, PD5936, Oliver, Wilson, PD4984, Deborah, Wilson, PD5640, James, Wilson, PD5555, Melanie, Wilson, PD648, Clare, Wood, PD4012, Dale Royce, Wood, PD5527, M, Wood, PD949, J, Wood, PD2511, Ciaran, Wood, PD3891, Madaleine, Wood, PD3874, M, Wood, PD3716, CH, Wood, PD1108, Michelle, Wood, PD3424, Stephen, Woodbridge, PD3300, Lucy, Woolley, PD2682, David, Woolley, PD2633, S, Wright, PD4366, Nicola, Wylde, PD2875, Barry, Wylde, PD3117, Gary, Yeaman, PD4463, Olivia, Yeaman, PD5220, Miley, Yeoman, PD4342, Danielle, Yeoman, PD3824, John, Young, PD5116, Helen, Young, PD4914,</p>															
Lynds ey	Burton		PD129	Chapt er	No point identified	Object	No comments made	No comments made	No comments made			No comments made.	No modifications proposed.	No issues have been raised by this representation.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no

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Stefania	Burns		PD7	Policy	SP10	Object			Objects to Policy SP10 on the grounds that the proposed Central Route is not needed by the residents and would impact negatively on their quality of life.				Remove the safeguarding for the Central route from Policy SP10.	The Council considers this policy to be sound. The Central Route is a long term road commitment that will support housing and employment regeneration and improve connectivity in the Coalfield. The alignment has full planning permission and has already been partly implemented (at High Dubmire). The road foundations through Elba Park were built as part of the reclamation of the former Cokeworks site. The alignment was chosen in order to avoid historic 18th Century waggonways (that were unearthed as part of the site reclamation) as well as areas of contaminated land that were buried and encapsulated on site. The planning permission also includes for the creation of biodiversity ponds and scrapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Roland	Buckingham		PD250	Policy	SP1	Object	Objects to Policy SP1 for the following reasons: the Council has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.	Objects to Policy SP1 for the following reasons: the Council has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.	Objects to Policy SP1 for the following reasons: the Council has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.		Objects to Policy SP1 for the following reasons: the Council has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.	Objects to Policy SP1 for the following reasons: the Council has identified more homes in SHLAA than needed to meet 745 homes per annum; the 10% buffer effectively equates to the homes needed to go into the Green Belt; economic growth level based on a 2016 consultation; the OAN is already inflated/based on ambitious figures/assumes high population growth; OAN much higher than 593 proposed by Government; OAN uplift not justified on economic grounds.	Not to amend the Green Belt boundary.	The housing requirement set out within the plan is consistent with the Council's latest OAN calculation, which is contained within the SHMA Addendum 2018. The Council is submitting its Plan under the NPPF transitional arrangements and therefore it is not considered appropriate to follow the standardised methodology.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.	
Angela	Templeman	Springwell Village Residents Association	PD5112	Policy	ST2	Object		Sites HGA1,2 and 3 would conflict with Policy ST2. Springwell has narrow roads which can't be widened. The installation of a 20mph speed limit in the village highlights existing traffic issues. Development of Sites HGA1,2 and 3 could not meet the criteria in Policy ST2.	Sites HGA1,2 and 3 would conflict with Policy ST2. Springwell has narrow roads which can't be widened. The installation of a 20mph speed limit in the village highlights existing traffic issues. Development of Sites HGA1,2 and 3 could not meet the criteria in Policy ST2.			Sites HGA1,2 and 3 would conflict with Policy ST2. Springwell has narrow roads which can't be widened. The installation of a 20mph speed limit in the village highlights existing traffic issues. Development of Sites HGA1,2 and 3 could not meet the criteria in Policy ST2.	Sites HGA1,2 and 3 would conflict with Policy ST2. Springwell has narrow roads which can't be widened. The installation of a 20mph speed limit in the village highlights existing traffic issues. Development of Sites HGA1,2 and 3 could not meet the criteria in Policy ST2.	Protect the existing Green Belt boundaries and remove the policies that propose deletion.	A Transport Assessment has been prepared for all HGA sites and the findings will have to be implemented as the sites come forward. This assessment will also ensure that site accesses are safe and also take into account how they will be accessed not only by private cars but for people on foot and bicycle as well. The Assessment recommends that these sites are deliverable and will not have an unacceptable impact on the local or strategic network. The Draft Infrastructure Delivery Plan (2018) has been prepared to support the delivery of the CSDP. It outlines the necessary supporting infrastructure required to support the growth proposed in the CSDP. The Council will work with its partners to ensure that infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Draft Planning Obligations SPD (2018) specifies the Council's approach to planning obligations, which includes contributions for highways and public transport amongst other infrastructure. Further justification can be found in the above evidence base documents and relevant Compliance Statement. The Council considers the Policy to be sound.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Taylor Wimpsey	Persimmon Homes and Story Homes	Burdon Lane Consortium	PD2760	Policy	ST3	Support with mods					Part 1(ii) and Part 3 of Policy ST3 should be amended to be consistent with Paragraph 32 of the NPPF which relates	Part 1(ii) and Part 3 of Policy ST3 should be amended to be consistent with Paragraph 32 of the NPPF which relates	Amend Part (ii) of Point 1 and Point 3 of Policy ST3 to refer to severe impacts to ensure consistency with NPPF.	Comments noted. Please refer to the Compliance Statement for a justification for Parking Standards and Home Charging points. The council acknowledges that highway mitigation is not always necessary	12.19 - It is therefore important that the potential impacts of development are understood and that any necessary	

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										to the residual impacts of development being severe. The policy refers to parking standards, but these are not included in the Plan and it's not clear what these standards are. Minor tweaks suggested regarding text on home charging apparatus. Concern over Paragraph 12.19 as highway mitigation is not always necessary prior to development taking place and should be at the appropriate time, which will also assist site viability.	to the residual impacts of development being severe. The policy refers to parking standards, but these are not included in the Plan and it's not clear what these standards are. Minor tweaks suggested regarding text on home charging apparatus. Concern over Paragraph 12.19 as highway mitigation is not always necessary prior to development taking place and should be at the appropriate time, which will also assist site viability.	Amend Minor modifications proposed to Point 5 relating to home charging apparatus. Amend Paragraph 12.19 to require infrastructure at the appropriate time, rather than prior to development taking place. Amend Paragraph 12.21 to change comply with the council's guidance on parking standards to take them into account. Modifications to Paragraph 12.22 to require development to enable home charging rather than make provision for the installation of apparatus.	prior to development taking place. Additional modifications are proposed to paragraph 12.19 and 14.14 to reflect this (M73 and M81).	improvements are identified prior to the development taking place and implemented at an appropriate time during the proposals development. 14.14 - In such circumstances the council will consider requests to reduce the level of planning obligations to a level which ensures that a scheme remains viable. The Council will, where possible, work with applicants to prevent plan developments stalling.
Adam	McVickers	Persimmon Homes (Durham)	PD4159	Policy	ST3	Object				There is inconsistency between Points 1(ii) and Point 3 of Policy ST3 and the NPPF. The tests in the policy should be amended to ensure consistency with the NPPF. The policy is not clear whether home charging apparatus would be required within every home, which would be unnecessary and could affect scheme viability. Object to Paragraph 12.19 as it is not always necessary for mitigation to be provided before development commences.	There is inconsistency between Points 1(ii) and Point 3 of Policy ST3 and the NPPF. The tests in the policy should be amended to ensure consistency with the NPPF. The policy is not clear whether home charging apparatus would be required within every home, which would be unnecessary and could affect scheme viability. Object to Paragraph 12.19 as it is not always necessary for mitigation to be provided before development commences.	Amend Points 1(ii) and Point 3 of Policy ST3 to ensure consistency with the NPPF. Make clear what would be expected with regard to home charging apparatus. Amend Paragraph 12.19 to require that infrastructure is provided at the appropriate time.	Comments noted. Please refer to the Compliance Statement for a justification for Parking Standards and Home Charging points. The council acknowledges that highway mitigation is not always necessary prior to development taking place. Additional modifications are proposed to paragraph 12.19 to reflect this (M73).	It is therefore important that the potential impacts of development are understood and that any necessary improvements are identified prior to the development taking place and implemented at an appropriate time during the proposals development.
Nick	Horsley	Mineral Products Association	PD4464	Policy	SP11	Object					Objects to Policy SP11 on the grounds that it is weak and repetitive. The Council already state that there is a need for minerals in Paragraph 2.77 and the LAA, and Policy HS1 identified the matters to be considered for proposed development.	The policy appears unnecessary.	Comment noted. The policy sets out the material planning considerations for minerals development and is considered necessary. The policy requires the applicant to demonstrate need, as this will change over time.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Melanie	Lindsley	The Coal Authority	PD1252	Policy	SP11	Support					Support Policy SP11 which sets out criteria against which proposals for mineral extraction will be considered.	No modifications proposed.	The Council notes this response. Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Richard	Cowen	CPRE North East	PD1379	Policy	SP11	Support					Supports the policy. The Policy should also refer to establishing Liaison Committees in appropriate cases to ensure that such amenity is adequately addressed throughout the duration of the works and that any decisions of the committee should be meaningful.	The Policy needs to refer to the establishment of meaningful Liaison Committees.	Comment noted. Supporting text has been amended at 13.3 to encourage the establishment of liaison committees (M77).	Potential cumulative impacts must also be considered. The Council encourage applicants to engage with local communities at an early stage when preparing development proposals and where appropriate, consider establishing liaison committees with representatives from the local communities.
James	Hudson	Environment Agency	PD218	Policy	SP11	Support					The EA supports this policy.	The 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	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. Policy SP11 sets out	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. Any site specific allocations will be made

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													coast. It should also be noted that on page 142 where the limestone is defined the name should be Magnesian not magnesium.	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 Council propose additional modifications to the glossary and paragraph 13.2 (M76 and M92). The Council has agreed a Statement of Common Grounds with the Environment Agency (SD.8k).	<u>through the Allocations and Designations Plan.</u> Glossary - Magnesian <u>Magnesian</u> Limestone Aquifer The eastern part of the city is built on Magnesian limestone 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.
Nick	Horsley	Mineral Products Association	PD4456	Chapter	13	Object					With the exception of Minerals Safeguarding, the policies in Chapter 13 fall short of the requirements of the NPPF.		The Plan should be amended to properly address the requirements of NPPF Paragraphs 204-208.	Comment noted. The Council considers that the policies within the plan meet the requirements of the NPPF. Further detail of how each of the policies within the chapter comply with the NPPF are set out in the Compliance Statement. However the Council has proposed an additional modification (M76) to clarify this in paragraph 13.2.	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 a landbank of at least 7 years for sand and gravel and at least 10 years for crushed rock, the aggregates landbank.
Melanie	Lindsley	The Coal Authority	PD1253	Policy	M1	Support						Support Policy M1 which relates to development proposals in MSAs	No modifications proposed.	The Council notes this response. Support noted.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	Horsley	Mineral Products Association	PD4471	Policy	M3	Object						Being located in the minerals chapter, this implies that only mineral developments need to consider the matter identified, but in reality all new development should consider these matters.	Delete Policy M3 and dovetail its requirement into Policy HS1.	The Council propose an additional modification to paragraph 5.6 to address this representation and to cross reference to land stability issues identified in Policy M3 (M33).	Where a site is affected by land stability issues (including mineral legacy issues as set out in Policy M3), the responsibility for securing a safe development rests with the developer and/or landowner.
Melanie	Lindsley	The Coal Authority	PD1255	Policy	M2	Support						Support Policy M1 which sets out criteria for the extraction of surface coal.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Melanie	Lindsley	The Coal Authority	PD1256	Policy	M3	Support						Support the inclusion of Policy M3 and the notification in it that development proposals of areas of coal mining legacy should be supported by a Coal Mining Risk Assessment.	No modification proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Stuart	Timmiss	Durham County Council	PD1401	Policy	M2	Support				Welcome the amendments made to Policy M2.			No Modification proposed.	The Council note this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McLellan	Story Homes	PD5386	Policy	ID1	Object	Policy ID1 is not effective or consistent with the planning obligations test set out in paragraph 104 of the NPPF and the CIL Regulations. Sub-point 2 is overly restrictive as it may not be feasible for		Policy ID1 is not effective or consistent with the planning obligations test set out in paragraph 104 of the NPPF and the CIL Regulations. Sub-point 2 is overly restrictive as it may not be feasible for		Policy ID1 is not effective or consistent with the planning obligations test set out in paragraph 104 of the NPPF and the CIL Regulations. Sub-point 2 is overly restrictive as it may not be feasible for		The following changes are necessary to make the policy sound: 1. Development will be expected to provide, or contribute towards the provision of: i. measures to directly mitigate the impacts	The Council propose to make additional modifications to 14.9 (M79) and 14.14 (M81) to make clearer that contributions will only be sought where they meet the tests provided in CIL regulations (122). The Council does not propose to amend point 2 of the policy. The IDP is a live document and will be reviewed annually and updated where necessary, to ensure scheme	This will be secured either through planning conditions, or where this is not appropriate, by planning obligations or other similar infrastructure tariffs in accordance with the <u>planning obligation tests set out in paragraph 14.11</u> , to

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
							the timing and prioritisation of the delivery of essential infrastructure to accord with the priority needs established in the IDP. More flexibility is required to accord with para 204 of NPPF.		the timing and prioritisation of the delivery of essential infrastructure to accord with the priority needs established in the IDP. More flexibility is required to accord with para 204 of NPPF.		the timing and prioritisation of the delivery of essential infrastructure to accord with the priority needs established in the IDP. More flexibility is required to accord with para 204 of NPPF.		of the development and make it acceptable in planning terms "and where appropriate contribute towards the delivery of essential infrastructure identified in the IDP. Planning obligations will only be sought where they are necessary, directly related and reasonably related to the development scheme." Strikethrough point ii. 2. The timing and prioritisation in the delivery of essential infrastructure "should seek to" accord with the priority needs established through the IDP. "The council will work with applicants to prevent planned development from becoming stalled."	timings and prioritisation are accurate and current.	ensure that the planned and necessary infrastructure is available to serve the development when it is first required. In such circumstances the council will consider requests to reduce the level of planning obligations to a level which ensures that a scheme remains viable. The Council will, where possible, work with applicants to prevent plan developments stalling.
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2779	Policy	ID1	Support with mods						Policy ID1 needs to be clearer that contributions will only be sought where they meet the tests provided in Regulation 122 of the CIL Regulations. Point 2 of the Policy is overly restrictive as it may not be feasible for the timing and prioritisation of the delivery of essential infrastructure to accord with the IDP. The Policy needs to be more flexible to reflect changing market conditions over time.	Amend Policy ID1 to make it clear that tests must meet the CIL Regulations, where appropriate contribute towards essential infrastructure in the IDP and introduce more flexibility.	The Council propose to make an additional modification to 14.9 (M79), to make clearer that contributions will only be sought where they meet the tests provided in CIL regulations (122).The Council does not propose to amend point 2 of the policy. The IDP is a live document and will be reviewed annually and updated where necessary, to ensure scheme timings and prioritisation are accurate and current.	This will be secured either through planning conditions, or where this is not appropriate, by planning obligations or other similar infrastructure tariffs in accordance with the <u>planning obligation tests set out in paragraph 14.11</u> , to ensure that the planned and necessary infrastructure is available to serve the development when it is first required.
		NHS Sunderland CCG	PD73	Policy	ID1	Object			Policy ID1 not effective as the Infrastructure Delivery Plan and schedule needs updating in terms of Healthcare.				Update/change Infrastructure Delivery Plan.	The Council will continue to work with Sunderland NHS CCG to develop an evidence base to identify where deficiencies in health infrastructure exist and where there is an identified need for new health provision across the city. Development of this evidence will dictate whether amendments to the Infrastructure Delivery Plan and Planning Obligations Supplementary Planning Document, as requested, are necessary. The Council has signed a Statement of Common Ground with the CCG (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Nick	McClellan	Story Homes	PD5421	Policy	ID2	Object		Broad support for ID2.However, regards sub-point 2, the Council should not require planning obligation monitoring fees and should therefore be removed. Sub-point2 of ID2 and Appendix 3 of Draft Planning Obligations SPD should therefore be removed.	Broad support for ID2.However, regards sub-point 2, the Council should not require planning obligation monitoring fees and should therefore be removed. Sub-point2 of ID2 and Appendix 3 of Draft Planning Obligations SPD should therefore be removed.		Broad support for ID2.However, regards sub-point 2, the Council should not require planning obligation monitoring fees and should therefore be removed. Sub-point2 of ID2 and Appendix 3 of Draft Planning Obligations SPD should therefore be removed.	Broad support for ID2.However, regards sub-point 2, the Council should not require planning obligation monitoring fees and should therefore be removed. Sub-point2 of ID2 and Appendix 3 of Draft Planning Obligations SPD should therefore be removed.	Sub-point 2 should be removed from the Policy.	The Council considers it necessary to enforce a fee structure within the policy to ensure that the full cost of planning contributions is secured through S106 agreements. The council consider this position to be legally sound. A monitoring fee obligation will only be sought where; The monitoring fee obligation is shown to be linked to at least one freestanding planning obligation; The decision to approve the obligations are outwardly shown to fully meet the planning tests and CIL Regulation 122(2); and The fee is a one-off payment (payable upon execution of the deed) or charged at trigger points (payable upon dates specified within the deed).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Adam	McVickers	Persimmon Homes (Durham)	PD4160	Policy	ID2	Object					Object to the inclusion of monitoring fees in Policy ID2 as these are not necessary to make applications acceptable in planning terms, are not justified and do not accord with national policy.	Object to the inclusion of monitoring fees in Policy ID2 as these are not necessary to make applications acceptable in planning terms, are not justified and do not accord with national policy.	Remove the requirement for monitoring fees from Policy ID2.	The Council considers it necessary to enforce a fee structure within the policy to ensure that the full cost of planning contributions is secured through S106 agreements. The council consider this position to be legally sound. A monitoring fee obligation will only be sought where; The monitoring fee obligation is shown to be linked to at least one freestanding planning obligation; The decision to approve the	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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														obligations are outwardly shown to fully meet the planning tests and CIL Regulation 122(2); and The fee is a one-off payment (payable upon execution of the deed) or charged at trigger points (payable upon dates specified within the deed).	
Taylor Wimpsey	Persimon Homes and Story Homes	Burdon Lane Consortium	PD2800	Policy	ID2	Support with mods					Object to the use of planning obligation monitoring fees. This is not justified and consistent with the NPPF.	Object to the use of planning obligation monitoring fees. This is not justified and consistent with the NPPF.	Remove sub point 2 from Policy ID2.	The Council considers it necessary to enforce a fee structure within the policy to ensure that the full cost of planning contributions is secured through S106 agreements. The council consider this position to be legally sound. A monitoring fee obligation will only be sought where; The monitoring fee obligation is shown to be linked to at least one freestanding planning obligation; The decision to approve the obligations are outwardly shown to fully meet the planning tests and CIL Regulation 122(2); and The fee is a one-off payment (payable upon execution of the deed) or charged at trigger points (payable upon dates specified within the deed).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Caroline	Strugnell	Bellway Homes Ltd	PD1986	Policy	ID2	Object		Objects to Policy ID2 on the grounds that Part 1 of the Policy does not make clear that it may not apply in all cases. The explanatory text regarding CIL in the supporting text should be in the Policy. Policy should also make clear that each site will be assessed on its merits.			Objects to Policy ID2 on the grounds that Part 1 of the Policy does not make clear that it may not apply in all cases. The explanatory text regarding CIL in the supporting text should be in the Policy. Policy should also make clear that each site will be assessed on its merits.	Objects to Policy ID2 on the grounds that Part 1 of the Policy does not make clear that it may not apply in all cases. The explanatory text regarding CIL in the supporting text should be in the Policy. Policy should also make clear that each site will be assessed on its merits.	Policy should be revised to make clear that the requirements may not apply in all cases.	The Council considers paragraphs 14.12 to 14.16, provide sufficient clarity in regard to planning obligations and viability issues that may affect a proposals viability and deliverability and demonstrates that each proposal will be assessed on its merits. The Council also considers paragraph 14.11 should remain in the supporting text of the policy as it would reiterate existing policy identified in the National Planning Policy Framework, Planning Practice Guidance (Paragraph: 001 Reference ID: 23b-001-20161116) and statutory tests identified in the Community Infrastructure Levy Regulations 2010.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
KARON HOMES		PD3391	Policy	ID2	Support with mods							Support the inclusion of point 3 to Policy ID2, however feel that the benefits of regeneration and meeting housing need in Paragraph 14.15 should be in the Policy. Due to uncertainty over grant funding and increased build costs planning obligations may become undeliverable. Further viability assessment should be undertaken to consider the viability of affordable schemes.	Include reference to regeneration and housing need in Policy ID2.Undertake further viability work on for affordable schemes.	The Council does not consider it appropriate to include specific reference to "regeneration" and "housing need" within the policy, as they are identified within paragraph 14.15 for example only. Inclusion within the policy would serve to exclude other infrastructure requirements as detailed within the draft Planning Obligations Supplementary Planning Document.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
		NHS Sunderland CCG	PD74	Policy	ID2	Object		Considers Policy ID2 is not positively prepared.	Considers Policy ID2 not to be effective.			Considers Policy ID2 not justified. In particular paragraph 14.15 in relation to preference given to the needs and priorities of an area when viability is an issue. This is not considered sound when all NHS premises are at capacity. The approach should be to apportion contributions towards the various infrastructure which is required to mitigate by equal percentage. The methodology for doing so should be set out in the Policy and not in an SPD.	When viability issues arise apportion contributions equally towards the various infrastructure which is required to mitigate the impact of the development. Set methodology for this out in Policy.	Comment noted. The Council consider as the infrastructure needs of an area vary throughout the city and may change over time, that it would not be appropriate to establish a prescriptive approach for Planning Obligations. The Council will publish more detailed guidance with regard to its approach for Planning Obligations through the Planning Obligations SPD. The Council have signed a Statement of Common Ground with the CCG (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ellen	Bekker	Natural England	PD2808	Chapter	Appendix 2 (Sustainability Appraisal)	Support with mods						Broadly welcome the amendments made to the CSDP SA. The SA assessment does not take mitigation into account in relation to the HGA	The SA assessment does not take mitigation into account in relation to the HGA sites. Therefore, as the HRA identifies likely	Comments noted. The policies in the plan provide the framework to secure any required mitigation identified. Any necessary mitigation will be agreed at the application stage. The Monitoring Framework has been updated. The Council and	The Monitoring Framework has been updated.

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												sites. Therefore, as the HRA identifies likely significant effects pre-mitigation, the same level of effect should be applied to the SA (significant negative effects). 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.	significant effects pre-mitigation, the same level of effect should be applied to the SA (significant negative effects). 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.	Natural England, following discussions, have agreed that the SA will not need to be updated if the HRA for the Core Strategy is updated and takes in to consideration the site HRAs. The Council has signed a Statement of Common Ground with Natural England (SD.8k).	
Julian	Borthwick	Friends of Sunderland Greenbelt	PD3010	Chapter	Appendix 2 - Consultation Statement		Given economic uncertainties and delay in preparing the Plan the Plan period is too long. The Plan period should be shortened and refreshed in 2 to 3 years. The Plan is inconsistent with first two principles of the NPPF in terms of being plan-led and empowering local people to shape their surroundings. The Plan has changed little since start of preparation in 2008. Objects to Alternative Approaches leaflet. Objects to previous rounds of consultation. Insufficient number of responses to Growth Options consultation to draw any conclusions.					Given economic uncertainties and delay in preparing the Plan the Plan period is too long. The Plan period should be shortened and refreshed in 2 to 3 years. The Plan is inconsistent with first two principles of the NPPF in terms of being plan-led and empowering local people to shape their surroundings. The Plan has changed little since start of preparation in 2008. Objects to Alternative Approaches leaflet. Objects to previous rounds of consultation. Insufficient number of responses to Growth Options consultation to draw any conclusions.	Reduce the length of the Plan period	The plan period is consistent with the NPPF which requires plans for be drawn up over an appropriate time period, preferably 15 years. The policies of the plan will be regularly monitored and the plan reviewed where necessary. The plan will be reviewed at least every 5 years in accordance with the NPPF. Numerous rounds of consultation have been undertaken by the Council which have exceeded the minimum requirements set out within legislation and the adopted Statement of Community Involvement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Pippa	Cheetham	O&H Properties	PD4250	Chapter	Appendix 2	Object						It is recommend that a Strategic HRA is undertaken for whole of city to gain clear understanding of how to mitigate across the whole area. This would feed in to the preparation of a policy to inform on appropriate delivery.	Specific wording provided for a new policy on Strategic Habitat Regulations Assessment.	The Council has undertaken HRA for all allocated sites for the Core Strategy, and as a result, 2 sites have been identified as having a potential impact on the European sites. Mitigation measures has been identified for both of these sites and are included in the Core Strategy HRA. This Plan does not allocate housing- this will be addressed in full at the next Plan stage (Allocations & Designations), and will be supported by an appropriate strategic mitigation strategy for impacts on European designations.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Ellen	Bekker	Natural England	PD2787	Chapter	Appendix 2 (HRA)	Support with mods						More certainty is required to demonstrate that mitigation can be delivered for the 2 HGA sites within the coastal zone of influence, to ensure that there are no adverse effects.	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.	The Council, Natural England, and Hellens Group have signed a Statement of Common Ground (SD.8k) outlining that further HRA work is required to identify and secure appropriate mitigation for site HGA7: North Hylton. The council and Natural England have signed a Statement of Common Ground (SD.8k) outlining that a HRA has been done for HGA8 and the Plan HRA has been updated to identify mitigation measures necessary for site HGA8.	The Council has signed two Statements of Common Ground with Natural England which set out the approach to mitigation for HGA sites and agreements with Hellens Land regarding the HRA.
Janice	Nicholson		PD418	Chapter	Appendix 2 - SHLAA	Object		Objects to building behind South Bents due to the traffic impact. Instead of housing we need more activities on the sea front.	Objects to building behind South Bents due to the traffic impact. Instead of housing we need more activities on the sea front.			Objects to building behind South Bents due to the traffic impact. Instead of housing we need more activities on the sea front.	No modifications proposed.	This representation relates to a planning application and not proposals within the Core Strategy and Development Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Nicholson		PD417	Chapter	Appendix 2 - SHLAA	Object						Objects to planning permission for building new houses at South Bents as does not believe that luxury homes are necessary and it would increase traffic making the existing estate dangerous	No modifications proposed.	This representation relates to a planning application and not proposals within the Core Strategy and Development Plan.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Kathy	Dobson		PD290	Chapter	Appendix 2 - SHLAA	Object			Objects to SHLAA Site 87 being included as a developable site as			Objects to SHLAA Site 87 being included as a developable site as	Would like more green areas for children to be	The site is a previously developed site considered suitable for housing due to the nature of the area. It is an	The Council considers there have been no soundness or legal

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					Site 87			Fencehouses is a small village and does not need any further housing. The site is the only grass area for children to play. The schools cannot cope with extra children. Concerns over increased pressure on doctor's surgeries and traffic.			Fencehouses is a small village and does not need any further housing. The site is the only grass area for children to play. The schools cannot cope with extra children. Concerns over increased pressure on doctor's surgeries and traffic.	provided in Fencehouses.	available site and has developer interest and as such is considered deliverable. It is recognised that the area has over time functioned as a local green space and this will be taken into consideration before any allocation is made within the allocations and designations plan and through any planning application that comes forward.	compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Dave	McGuire	Sport England	PD4462	Chapter	Appendix 2	Object		Sport England does not consider the Plan to be sound as the Built sports facilities strategy is not up to date. The Playing Pitch Strategy (PPS) is considered to be up to date.				No modification proposed	The Council has an up-to-date Playing Pitch Strategy and Indoor Sports Facilities Assessment Report which Sport England have been involved preparing.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Allan	Coxon		PD282	Chapter	Appendix 2	Support with mods		Support proposals in the Plan, but feel that SHLAA Site 464B should be included as a firm proposal and not a windfall site. Including the site in the Plan would support proposals by SME's and could deliver small self-build plots. The site would provide a turning head and natural gas supply to the village, which others would benefit from.			Support proposals in the Plan, but feel that SHLAA Site 464B should be included as a firm proposal and not a windfall site. Including the site in the Plan would support proposals by SME's and could deliver small self-build plots. The site would provide a turning head and natural gas supply to the village, which others would benefit from.	No modifications proposed.	The site out forward for inclusion within the supply is within the Green Belt and has not been put forward for release. See Compliance in relation to Spatial Strategy.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
Sharon	Coxon		PD283	Chapter	Appendix 2 - SHLAA Site 464B	Object					Support proposals in the Plan, but feel that SHLAA Site 464B should be included as a firm proposal and not a windfall site. Including the site in the Plan would support proposals by SME's and could deliver small self-build plots. The site would provide a turning head and natural gas supply to the village, which others would benefit from.	No proposed modifications.	The site referred to is within the Green Belt and has not been put forward for release. See the Compliance Statement.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Hudson	Environment Agency	PD206	Policy	Appendix 2 - SFRA	Support with mods					The EA find the Plan to be sound but require 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 EA 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 would find the plan to be Sound	Request that the appendices are submitted alongside the Level 1 SFRA, which support the allocated sites within the Local Plan.	The Council has submitted the SFRA Level 1 and Level 2 as part of the evidence base supporting the Plan. This includes the appendices in SFRA level 1	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
John	Jameson	Miller Homes Ltd - NE Region	PD888	Chapter	Appendix 2 - SHLAA	Support					Supports the inclusion of land at South Bents (Ref 154A) in the SHLAA as a suitable site for residential development and anticipate that the site will be included as a housing allocation in the emerging A&D Plan.	No modifications proposed.	The Council notes this response.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.
James	Ebdale		PD3239	Chapter	Appendix 2 - Schedule of Representations	Object	The Council's full schedule of representations was not published alongside the release of the Publication Draft Plan. The full schedule was not published until 4 weeks into the					The Council should do a full audit of the Schedule of Representations, publicise the information and re-start the consultation process.	The Council has prepared a Schedule of Representation for the Draft Plan. These were published on the website during the Consultation. Hard copies are available at the Civic Centre.	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.

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							statutory consultation period. This is a breach of statutory duty and a legal error.										
James	Hudson	Environment Agency	PD221	Chapter	Appendix 2	Support with mods		The EA supports the Green Infrastructure and consider it to be positively prepared.					Paragraph 3.1.2 Existing Data - the EA wish to advise that the EA 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. The EA would expect this should have a net positive impact on overall development.	The Council acknowledge the response from the Environment Agency. The Council and the Environment Agency have agreed a Statement of Common Ground (SD.8k).	The Council considers there have been no soundness or legal compliance issues raised by this representation which require modifications to the Plan. Therefore no modifications are proposed.		
Nick	Horsley	Mineral Products Association	PD4473	Chapter	Appendix 3	Object							The Plan is vague and would benefit from identifying the existing mineral infrastructure sites.	Amend the plan accordingly.	Comment noted. The Council consider that there is a sufficient level of detail already included in Paragraph 2.76. Appendix 3 has been updated to identify the 5 existing sites (M84).	Replaced map, adding more detailed key (see Appendix 1)	
Nick	Horsley	Mineral Products Association	PD4477	Chapter	Appendix 5	Support with mods							The scope of the information goes beyond the information which is necessary for restoration.	Amend the list accordingly.	Comment noted. The Council recognise whilst all of the issues in Appendix 5 should be addressed, some of these issues may be dealt with through the planning application process rather than through the restoration plan. Paragraph 13.16 and Appendix 5 have been updated accordingly (M85).	Appendix 5 Restoration Plan Issues to be addressed through restoration Restoration Plan A restoration plan should include: The following issues should be addressed through restoration:	
		NHS Sunderland CCG	PD71	Chapter	Glossary	Object			Glossary is not effective as there should be a definition of local services in the glossary.				Set out definition of Local Services in Glossary.	The Council propose an additional modification to the glossary (M91) which has been agreed with the CCG in a Statement of Common Ground (SD.8k).	Local Services A facility that provides a valuable local service to the community such as a small convenience store, post office or public house.		
Ray	Delaney		PD37	Chapter	Glossary	Object		The Glossary should include a definition of Executive Homes as set out in the SHMA and self-build homes					The Glossary should include a definition of Executive Homes as set out in the SHMA and self-build homes	The Glossary should include a definition of Executive Homes as set out in the SHMA and self-build homes	The SHMA sets out what executive housing comprises, however due to the difficulties in defining it, the plan refers to larger detached dwellings for families, as such a definition of executive homes is not required for the glossary. The City Council have included a definition of self-build homes within the glossary (M94).	Self-Build and Custom-Build Housing built by an individual, a group of individuals, or persons with or for them, to be occupied by that individual. Such housing can be either market or affordable housing.	
Ray	Delaney		PD36	Figure	Policies Map	Object		SHLAA site 464B should be shown as a housing allocation on the Plan.	SHLAA site 464B should be shown as a housing allocation on the Plan.				SHLAA site 464B should be shown as a housing allocation on the Plan.	SHLAA site 464B should be shown as a housing allocation on the Plan.	SHLAA site 464B should be shown as a housing allocation on the Plan.	Site 464B at Offerton is not supported- the site is now considered to constitute greenfield land whereas the previous assessment considered the site to be brownfield land.	The Council considers there have been no soundness or legal compliance issues raised by this

Given Name	Family Name	Company/Organisation	Rep ID	Chapter/Policy		Object Support	Summary Compliant with Law	Summary Positively Prepared	Summary Effective	Summary DTC	Summary Consistent with National Policy	Summary Justified	Summary Proposed Modification	Council Response	Council Proposed Modifications
														Supporting the removal of this site from the Green Belt would require major alteration to the city's Green Belt boundary (removing existing strong and durable boundaries), and such boundary alteration cannot be justified. It should be noted that the assessment in this addendum supersedes the assessment contained within the Green Belt Assessment Stage 1 Updated and Stage 2 (2017) in relation to this site.	representation which require modifications to the Plan. Therefore no modifications are proposed. .

