

Core Strategy and Development Plan 2015-2033

Compliance statement

December 2018



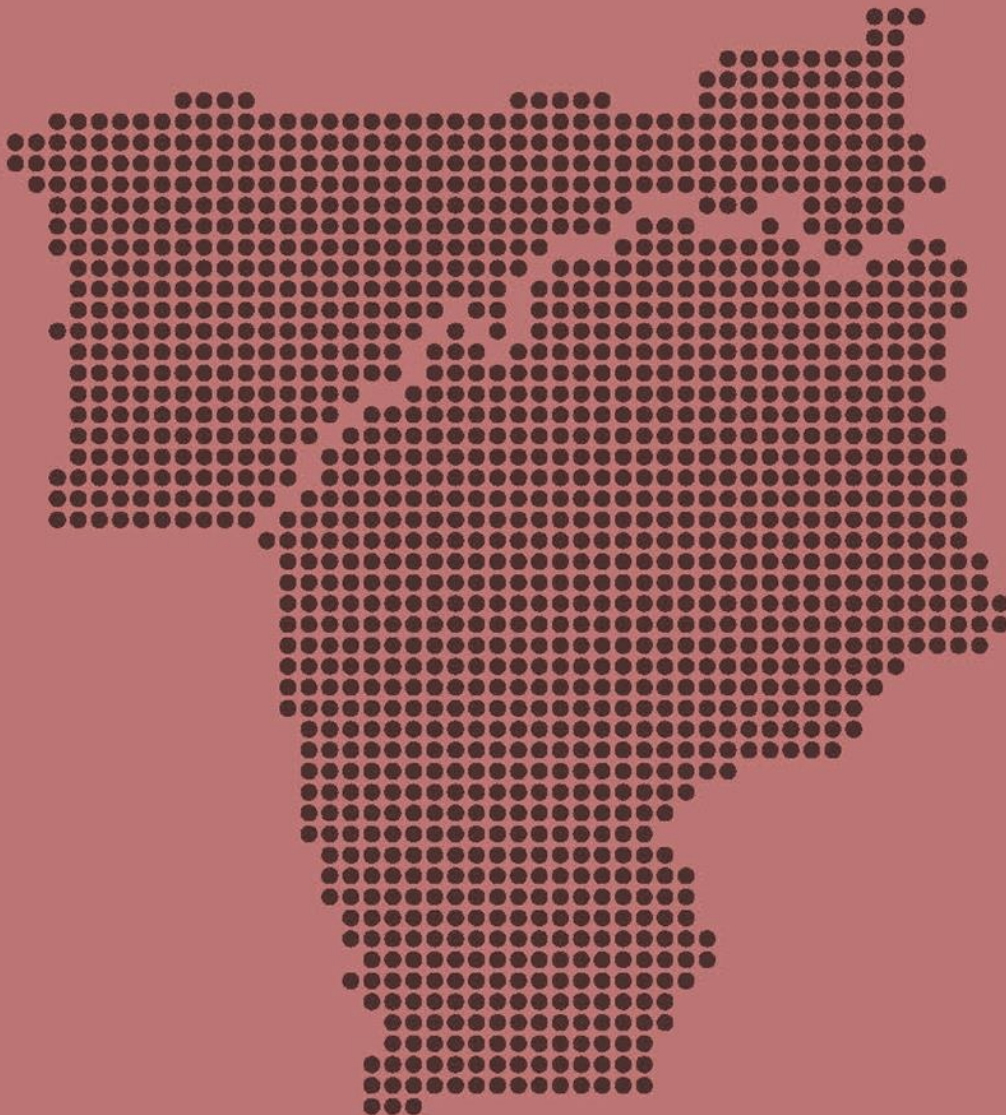
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1. Introduction

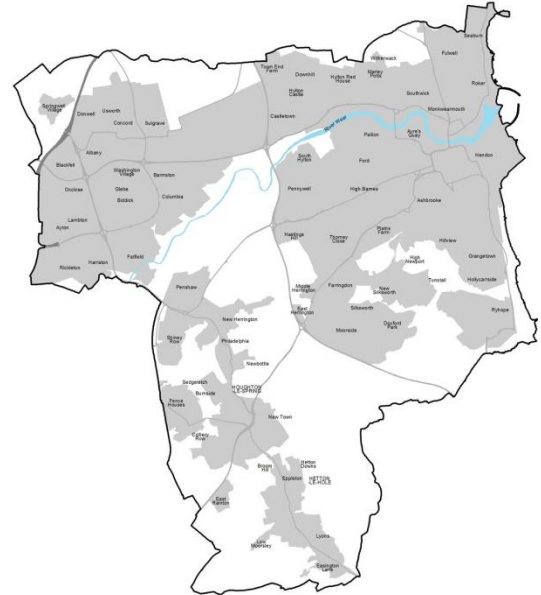


1. Introduction

1.1 The Core Strategy and Development Plan, here after referred to as 'this Plan' is being prepared by Sunderland City Council and once adopted will form part of the Local Plan. The Sunderland Local Plan is in three parts:

Part One – Core Strategy and Development Plan:

The Plan sets an overarching strategy, strategic policies and strategic allocations and designations for the future change and growth of Sunderland. This Plan also includes local policies for development management purposes. This Plan will cover the period from 2015 to 2033 and covers all land within Sunderland's administrative boundaries (Figure 1).



Part Two – Allocations and Designations Plan

(hereafter referred to as the A&D Plan): will set out local policies including site-specific policy designations and allocations for the development, protection and conservation of land in the city in order to deliver the overall strategy set out within this Plan. The A&D Plan will cover all land within Sunderland's administrative boundaries.

Part Three – International Advanced Manufacturing Park (IAMP) Area Action Plan

(AAP) 2017-2032¹ (hereafter referred to as the IAMP AAP): was adopted by Sunderland City Council and South Tyneside Council in November 2017. This part of the Local Plan sets out site specific policies for the comprehensive development of the IAMP.

Figure 1 Sunderland

1.2 This Plan (once adopted) and the IAMP Area Action Plan (SP.9) have superseded saved policies of the Sunderland Unitary Development Plan (UDP) 1998 and UDP Alteration No. 2 (2007). However, a number of policies will remain as saved policies and part of the Development Plan until such time as the A&D Plan is adopted. These saved policies will continue to be applied and be a consideration in the determination of planning applications, until they are replaced by policies in the A&D Plan. Appendix 1 sets out the saved policies which should be read alongside this Plan.

Purpose of the Compliance Statement

- 1.3 The Plan has been prepared in accordance with the following legislation and guidance:
- The Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations (2004) (as amended)("2004 Act")¹;
 - The Localism Act 2011 (which amended sections of the above 2004 Act) ("Localism Act 2011")²;
 - The Town and Country Planning (Local Planning) (England) Regulations 2012 ("2012 Regulations"³); and
 - The National Planning Policy Framework ("NPPF")⁴ and Planning Practice Guidance (PPG)⁵.

¹ <https://www.legislation.gov.uk/ukpga/2004/5/contents>

² <http://www.legislation.gov.uk/ukpga/2011/20/contents/enacted>

³ <http://www.legislation.gov.uk/uksi/2012/767/contents/made>

⁴ https://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- 1.4 The purpose of this Compliance Statement is to succinctly set out how the policies of the Plan are compliant with the requirements outlined above. This Compliance Statement is not a policy document. It should be read alongside the evidence in the Local Plan library (Appendix 2).

Structure of Compliance Statement

- 1.5 This Statement has three sections:

- Section 1. Introduction** – Introduction to this statement.
- Section 2. Legal and Procedural Compliance** – Sets out how this Plan is in compliance with legal and national requirements.
- Section 3. Soundness Check** – Sets out how the each policy in this Plan is considered to be sound.

⁵ <https://www.gov.uk/government/collections/planning-practice-guidance>

2. Preparing the Plan

2.1 The Council started preparing this Plan back in 2005. There have been eight key stages to Plan preparation as listed below:

Stage 1	LDF Key Issues & Options Consultation ⁶	November 2005 - January 2006
Stage 2	LDF Core Strategy Preferred Options Draft Consultation ⁷	December 2007 – February 2008
Stage 3	LDF Sustainability Appraisal Scoping Report Consultation ⁸	May – July 2009
Stage 4	LDF Alternative Approaches Consultation ⁹	15 September – 6 November 2009
Stage 5	Local Plan Draft Core Strategy & Development Management Policies Consultation ¹⁰	1 August – 11 October 2013
Stage 6	Local Plan Core Strategy Growth Options Consultation ¹¹	19 May – 1 July 2016
Stage 7	Local Plan Draft Core Strategy & Development Plan Consultation ¹²	7 August – 2 October 2017

⁶ [https://www.sunderland.gov.uk/media/20907/SP-3-LDF-Key-Issues-Options-Consultation/pdf/SP.3_LDF_Key_Issues_Options_Consultation_\(2005\).pdf?m=636803118812370000](https://www.sunderland.gov.uk/media/20907/SP-3-LDF-Key-Issues-Options-Consultation/pdf/SP.3_LDF_Key_Issues_Options_Consultation_(2005).pdf?m=636803118812370000)

⁷ [https://www.sunderland.gov.uk/media/20911/SP-7-LDF-Core-Strategy-Development-Plan-Draft-Preferred-Options-2007-/pdf/SP.7_LDF_Core_Strategy_Development_Plan_Draft_Prefered_Options_\(2007\).pdf?m=636803120846400000](https://www.sunderland.gov.uk/media/20911/SP-7-LDF-Core-Strategy-Development-Plan-Draft-Preferred-Options-2007-/pdf/SP.7_LDF_Core_Strategy_Development_Plan_Draft_Prefered_Options_(2007).pdf?m=636803120846400000)

⁸ [https://www.sunderland.gov.uk/media/20912/SP-8-LDF-Draft-Sustainability-Appraisal-Scoping-Report-2009-/pdf/SP.8_LDF_Draft_Sustainability_Appraisal_Scoping_Report_\(2009\).pdf?m=636803121279800000](https://www.sunderland.gov.uk/media/20912/SP-8-LDF-Draft-Sustainability-Appraisal-Scoping-Report-2009-/pdf/SP.8_LDF_Draft_Sustainability_Appraisal_Scoping_Report_(2009).pdf?m=636803121279800000)

⁹ [https://www.sunderland.gov.uk/media/20908/SP-4-LDF-Alternative-Approaches-Consultation-2009-/pdf/SP.4_LDF_Alternative_Approaches_Consultation_\(2009\).pdf?m=636803119304030000](https://www.sunderland.gov.uk/media/20908/SP-4-LDF-Alternative-Approaches-Consultation-2009-/pdf/SP.4_LDF_Alternative_Approaches_Consultation_(2009).pdf?m=636803119304030000)

¹⁰ [https://www.sunderland.gov.uk/media/20910/SP-6-SLP-Core-Strategy-and-Development-Management-Policies-Draft-Revised-Preferred-Options-2013-/pdf/SP.6_SLP_-_Core_Strategy_and_Development_Management_Policies_-_Draft_Revised_Prefered_Options_\(2013\).pdf?m=636803120307100000](https://www.sunderland.gov.uk/media/20910/SP-6-SLP-Core-Strategy-and-Development-Management-Policies-Draft-Revised-Preferred-Options-2013-/pdf/SP.6_SLP_-_Core_Strategy_and_Development_Management_Policies_-_Draft_Revised_Prefered_Options_(2013).pdf?m=636803120307100000)

¹¹ [https://www.sunderland.gov.uk/media/20909/SP-5-Local-Plan-Core-Strategy-Growth-Options-Consultation-2016-/pdf/SP.5_Local_Plan_Core_Strategy_Growth_Options_Consultation_\(2016\).pdf?m=636803119749370000](https://www.sunderland.gov.uk/media/20909/SP-5-Local-Plan-Core-Strategy-Growth-Options-Consultation-2016-/pdf/SP.5_Local_Plan_Core_Strategy_Growth_Options_Consultation_(2016).pdf?m=636803119749370000)

¹² [https://www.sunderland.gov.uk/media/20905/Sp-1-Core-Strategy-and-Development-Plan-2015-33-Draft-2017-/pdf/SP.1_Core_Strategy_and_Development_Plan_2015-2033_Draft_\(2017\).pdf?m=63680311778100000](https://www.sunderland.gov.uk/media/20905/Sp-1-Core-Strategy-and-Development-Plan-2015-33-Draft-2017-/pdf/SP.1_Core_Strategy_and_Development_Plan_2015-2033_Draft_(2017).pdf?m=63680311778100000)

Stage 8	Local Plan Core Strategy & Development Plan Publication Draft Consultation ¹³	15 June – 27 July 2018
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Stages 1 to 3

2.2 The first formal stage of preparing the Core Strategy began with the identification of initial Issues and Options for the City. Public consultation on these took place in late 2005 and this was used to inform and prepare the subsequent Core Strategy Preferred Options draft.

Stages 4 and

- 2.3 Due to changes in legislation on plan-making and emerging local circumstances (the adoption of the RSS, new evidence on housing and employment needs), and to ensure that the Core Strategy was founded on strong and sustainable development principles, it was deemed necessary to give further consideration to how the city might develop spatially. In particular, consideration needed to be given to the different ways that housing and employment might feature in Sunderland and the implications of these for future development patterns.
- 2.4 The Alternative Approaches document (September 2009, SP.4) set out four different strategic options for the growth of the City over the next 20+ years. The approaches were based upon previous Core Strategy consultation feedback, the policies of the adopted UDP Alteration for Central Sunderland, the city's Economic Masterplan and the principles of the (now revoked) Regional Spatial Strategy (RSS).
- 2.5 Following consultation on the Alternative Approaches document, in August 2013 the Council published its Draft Core Strategy and Development Management Policies plan for consultation (SP.6). This set out the levels of growth being planned for within the city, which were based on the Alternative Approaches consultation and also included a number of detailed Development Management policies.

Stages 6 to 8

- 2.6 Although work on the Plan commenced as early as 2005, the Council decided to rebase the Plan with a start date of 2015, to take account of the passage of time, updated evidence and changes to Government guidance.
- 2.7 In May 2016, the Council published its Growth Options (SP.5), which set out three alternative growth scenarios for the city over the revised plan period based on new evidence.
- 2.8 Following consultation on the Growth Options, the Council published its Draft Core Strategy and Development Plan for consultation in August 2017 (SP.1). This set out the proposed spatial strategy for the city, including a number of strategic site allocations. The draft plan also included detailed Development Management policies.
- 2.9 After making amendments to the plan to address issues raised in response to the consultation on the Draft Core Strategy and Development Plan, the Council published its Publication Draft Core Strategy and Development in June 2018 (SD.1).

¹³ https://www.sunderland.gov.uk/media/20849/SD-1-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft/pdf/SD.1_Core_Strategy_and_Development_Plan_2015-2033_Publication_Draft.pdf?m=636803778731670000

2.10 Following Council approval in November 2018, the Publication Draft Core and Development Plan (including minor modifications) has been approved for submission to the Secretary of State for Examination in Public.

2. Legal and Procedural Compliance



3. Legal and Regulatory Compliance

- 3.1 The Plan has been prepared in compliance with the Planning and Compulsory Purchase Act 2004 (2004 Act), the Town and Country Planning (Local Development) (England) Regulations (2004) (as amended), the Localism Act 2011 (which amended sections of the above 2004 Act), the Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (2012).
- 3.2 However, as set out in Chapter 2, the Plan has been prepared over a number of years and through an ever changing legislative context. This chapter confirms that the Publication Draft of the Plan meets the legal and regulatory requirements.

Planning and Compulsory Purchase Act 2004 (2004 Act)

- 3.3 A Local Development Scheme is required under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by the Localism Act 2011). This must specify (among other matters) the documents which, when prepared, will comprise the Local Plan for the area. Section 19 of the Act requires that when a development plan is prepared it must be in compliance with the Local Development Scheme¹⁴. This statement sets out how the Council is in accordance with the current Local Development Scheme.
- 3.4 A Statement of Community Involvement (SCI)¹⁵ is required under section 18 of the 2004 Act which development Plans should be in accordance with when preparing a development Plan. This statement explains how the Plan is aligned to the Councils SCI.

National Context

- 3.5 The Planning and Compulsory Purchase Act (2004) introduced a requirement for all Local Planning Authorities (LPAs) to produce a Local Development Framework (LDF). The LDF was intended to comprise a portfolio of Development Plan Documents that collectively provide the spatial planning strategy for the area. At the centre of an authority's LDF was the Core Strategy which should set a clear vision for the area and set out a strategic framework to guide and manage future growth and development. Through the publication of the NPPF, the introduction of the Localism Act 2011 and the Town and Country Planning (Local Planning) (England) Regulations 2012 there have been a number of significant amendments to the national planning context.

The Localism Act

- 3.6 The Localism Act 2011 includes a number of reforms that were intended to make the planning system clearer, more democratic, more effective and introduced the 'Duty to Cooperate'. The Act places a duty on LPAs, County Councils (where a two-tier planning system exists) and other bodies with statutory functions to 'cooperate' with each other. Those other bodies are defined in the Town and Country Planning (Local Planning) (England) Regulations 2012.

The National Planning Policy Framework (NPPF)

- 3.7 The NPPF sets out the Government's planning policies for England and aims to promote sustainable development and growth, while making the planning system less complex and more accessible.
- 3.8 National planning policy places Local Plans at the heart of the planning system, so it is essential that they are in place and kept up to date. Local Plans set out a vision and a

¹⁴ https://www.sunderland.gov.uk/media/20990/SD-15-Local-Plan-Local-Development-Scheme-2018-2020/pdf/SD.15_Local_Plan_-_Local_Development_Scheme_2018-2020.pdf?m=636807379594670000

¹⁵ <https://www.sunderland.gov.uk/media/17902/Statement-of-Community-Involvement-SCI-/pdf/SCI.pdf?m=635991841742530000>

framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for safeguarding the environment, adapting to climate change and securing good design.

- 3.9 The Framework emphasises that plans should provide a practical framework within which decisions on planning applications can be made by providing clear policies on what will or will not be permitted and where. To this end, it states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in a plan. The NPPF also states that a Local Plan should:
- plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
 - be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
 - be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;
 - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
 - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development, where appropriate;
 - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
 - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
 - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.
- 3.10 The original NPPF was published in March 2012 and established the national policy framework against which emerging plans would be assessed. Following consultation on proposed changes to the NPPF, the Government published a revised version of the NPPF in July 2018 (Hereafter referred to as NPPF¹⁶). As part of the transitional arrangements set out within Paragraph 214¹⁷ of the revised NPPF, as the plan has been submitted for Examination in advance of the 24 January 2019, it will be determined against the policies within the previous Framework. The Council considers that the requirements of the NPPF (2012) have been fully complied with.

Planning Practice Guidance (PPG)¹⁸

- 3.11 The government launched its Planning Practice Guidance (PPG) in March 2014. The website brings together many areas of English planning guidance into a new format, linked to the NPPF. The PPG is a live resource which is regularly updated. To reflect changes to the revised NPPF, the PPG has been updated to ensure that it is aligned to the new Framework. However, as the Council have submitted their plan under the transitional arrangements, it has been prepared to be in alignment with the previous version of the PPG.
- 3.12 Under section 18 of the 2004 Act (as amended), LPAs are required to produce a Statement of Community Involvement (SCI). The SCI is a statutory document that identifies the process

¹⁶ Para 214 NPPF, "*The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned.*" https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

¹⁸<https://www.gov.uk/government/collections/planning-practice-guidance>

of community involvement and engagement a Council will follow for each type of Development Plan Document and development management decision, enabling the community to know how and when they will be involved in the planning process. The following paragraphs set out details of the Councils SCI and the requirements of this document.

- 3.13 The Council adopted its latest SCI in February 2015, which is an amendment to the first SCI adopted in November 2006. The SCI sets out the specific consultation bodies and general consultation bodies to be consulted. The Council also maintains a list of individuals, groups and organisations to be notified during the various stages of the plan making process.
- 3.14 The Council must notify either by letter or email the specific and general consultation bodies at preparation, publication and submission stages of the plan. The SCI states that Sunderland City Council: *"may carry out additional consultation exercises as appropriate.... This may include staffed public exhibitions, public meetings, press releases, and publicity on the Councils website and social media pages... Further, there may be occasions whereby specific proposals may directly affect a specific geographical area, community or group and therefore requires more intensely focused publicity. This could, for instance, involve notifying individual households by letter, concentrating publicity material within the locality and embarking upon a more localised programme of public engagement events."*
- 3.15 The SCI encourages responses to be submitted via Sunderland City Council's website; however response forms can also be returned by email, post or in person.
- 3.16 Full compliance with the Council's SCI has been achieved through the consultation completed during the preparation of the Plan. The Plans compliance with the 2004 Act (as amended) and 2012 Regulations is demonstrated in the Consultation Statement (SD07)¹⁹.

Local Development Scheme (LDS) (SD15)

- 3.17 Paragraph 15 of the 2004 Act (as amended) requires all LPAs to prepare a Local Development Scheme (LDS). LDSs set out the purpose and coverage of Development Plan documents and the approximate timescales for their delivery. Paragraph 19 (1) states *'Local development documents must be prepared in accordance with the local development scheme'*.
- 3.18 Sunderland's latest Local Development Scheme was published in December 2018 and sets the following timetable for the preparation of the Plan. At this stage of Plan development, the Plan is in accordance with the LDS.

Core Strategy & Development Plan	LDS Timetable
Plan Preparation (Regulation 18)	Summer 2017
Consultation on Publication (Regulation 19)	Summer 2018

¹⁹

<http://www.sunderland.gov.uk/Committees/CMIS5/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=8mkc09LbMWv16ZRILJyMechyuK9%2FQSehOZaJviUORFMPXtO9fCTEqw%3D%3D&rUzwrPF%2BZ3zd4E7Ikn8Lvw%3D%3D=pwRE6AGJFLDNIh225F5QMaQWCTPHwdhUfCZ%2FLUQzgA2ul5jNRG4jdQ%3D%3D&mCTIbCubSFFxsDGW9IXnlq%3D%3D=hFflUdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFflUdN3100%3D&uJovDxwdjMPoYv%2BAJvYtyA%3D%3D=ctNJff55vVA%3D&FgPIIEJYlotS%2BYGoBi5oIA%3D%3D=NHdURQburHA%3D&d9Qji0aq1Pd993jsyOJqFvmyB7X0CSQK=ctNJff55vVA%3D&WGewmoAfeNR9xqBuxOr1Q8Za60lavYmz=ctNJff55vVA%3D&WGewmoAfeNQ16B2MHuCPMRKZMwaG1PaO=ctNJff55vVA%3D>

Submission (Regulations 22)	Winter 2018
Examination	2019
Adoption	2019

Duty to Cooperate (SD15)

3.19 The Duty to Cooperate (the duty) became a legal requirement under the provisions of section 110 of the Localism Act 2011 which inserted a new section 33A into the Planning Compulsory Purchase Act 2004 ("2004 Act"). This provision came into force in November 2011. The duty applies to all LPAs, national park authorities and county councils in England. Section 33A of the 2004 Act requires LPAs and other prescribed bodies to co-operate with each other on strategic matters so as to maximise the effectiveness of preparing development plan documents. In particular, the duty requires LPAs to engage with the aforementioned parties constructively, actively and on an ongoing basis in preparing a Local Development Document ("LDD"). In addition, the LPA must also have regard to the activities of the Local Enterprise Partnership (LEP) and the local nature partnership (LNP) as far as they are relevant to preparing the LDD.

3.20 The prescribed bodies relevant to this, as listed in Part 2 Regulations 2012, are:

- The Environment Agency
- Historic England
- Natural England
- The Civil Aviation Authority
- The Homes and Communities Agency (now called Homes England)
- Clinical Commissioning Groups
- Office for Rail Regulation
- Highways England
- The Marine Management Organisation
- Integrated Transport Authority (Nexus)
- Highways Authority (i.e. Sunderland City Council).
- Local Enterprise Partnerships

3.21 The statutory Duty to Cooperate is further expanded upon within paragraph's 178 to 181 of the NPPF (2012). Here the policy clearly states that the Government expects joint working on areas of common interest to be "*diligently undertaken for the mutual benefit of neighbouring authorities*". It refers in particular to the Duty to Cooperate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities set out in paragraph 156 of the NPPF (2012). Paragraph 156 refers to:

- *"The homes and jobs needed in the area;*
- *the provision of retail, leisure and other commercial development;*
- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- *the provision of health, security, community and cultural infrastructure and other local facilities; and*
- *climate change mitigation and adaptation, conservation*

3.22 LPAs should also work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual plans. Such joint working is envisaged as being able to meet development requirements which cannot wholly be met by the authority within its own area – for instance because of lack of

physical capacity or because to do so would cause significant harm to the principles and policies of the NPPF.

- 3.23 Paragraph 181 of the NPPF (2012) expects that LPAs must demonstrate evidence of having *“effectively cooperated to plan for issues with cross boundary impacts when their Local plans are submitted for examination”*. Examples of evidence may include *“plans or evidence prepared as part of a joint committee, a memorandum of understanding or a jointly prepared started which is presented as evidence of an agreed position”*. LPAs must demonstrate a continuous process of engagement from inception to implementation which will result in a final position, where a plan is in place, to provide land and infrastructure necessary to support current and future levels of development.
- 3.24 This is reinforced within the PPG, which sets out what is required and gives further guidance on the duty, including how local authority officers and councillors have an important role to plan in the process and that the duty requires active and sustained engagement, working together constructively from the outset of plan preparation.
- 3.25 Taking account all of the above, LPAs are obliged to demonstrate that they have undertaken effective and continuous collaborative working to plan for issues with impacts beyond their administrative area when their Local Plans are submitted for examination to the Secretary of State.
- 3.26 The Council’s Duty-to-Cooperate Statement sets out how the Council has met this requirement²⁰.

Consultation and Engagement

- 3.27 Consultation and engagement has been a key element to the preparation of the Plan. Paragraph 155 of the NPPF (2012) states that *“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”* At each stage of Plan preparation, the Council has followed the following legislation and guidance:
- The Planning and Compulsory Purchase Act 2004, the Town and Country Planning (Local Development) (England) Regulations (2004) (as amended)
 - The Localism Act (which amended sections of the above 2004 Act).
 - The Town and Country Planning (Local Planning) (England) Regulations 2012 and the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG).
- 3.28 The Council has published a Consultation Statement (SD07)²¹ which comprehensively demonstrates how the Council have satisfied the requirement of their SCI and met the

²⁰ [https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

²¹ <http://www.sunderland.gov.uk/Committees/CMIS5/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShqo=8mkc09LbMWv16ZRIJymecHyuK9%2FQSehOzaJviU0RFMPXtQ9fCTEqw%3D%3D&rUzwRPf%2BZ3zd4E7Ikn8Lyw%3D%3D=pwRE6AGJFLDNIh225F5QMaQWcPHwdhUfCZ%2FLUQzgA2uL5jNRG4jdQ%3D%3D&mCTIbCubSFFxsDgW9IXnlq%3D%3D=hFflUdN3100%3D&kCx1AnS9%2FpWZQ40DXFvdEw%3D%3D=hFflUdN3100%3D&uJovDxwdjMPoYv%2BAJvYtyA%3D%3D=ctNJff55vVA%3D&FgPIIEJYlotS%2BYGoBi5oIA%3D%3D=NHdURQburHA%3D&d9Qji0aq1Pd993jsyOJqFvmyB7X0CSQK=ctNJff55vVA%3D&WGewmoAfeNR9xqBuxOr1Q8Za60lavYmz=ctNJff55vVA%3D&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJff55vVA%3D>

requirements of Regulation 22 (1) (c) of The Town and Country Planning (Local Planning) (England) Regulations 2012 (SI. 2012 No.767) (2012 Regulations) by demonstrating:

- *Which bodies and persons the local planning authority invited to make representations under regulation 18;*
- *How those bodies and persons were invited to make representations made under regulation 18;*
- *A summary of the main issues raised by the representations made pursuant to regulation 18;*
- *How any representations made pursuant to regulation 18 have been taken into account;*
- *If representations were made pursuant to regulation 18 and regulation 20, the number of representations made and a summary of the main issues raised in those representations; and*
- *If no representations were made in regulation 20, that no such representations were made.*

3.29 In meeting this requirement, the plan making process must also meet the requirements of regulations 18, 19, 20 and 22 of the 2012 Regulations as set out below:

18. (1) A local planning authority must-

(a) Notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) Invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are—

(a) Such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) Such of the general consultation bodies as the local planning authority consider appropriate; and

(c) Such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1).

19. Before submitting a local plan to the Secretary of State under section 20 of the Act, the local planning authority must -

(a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and

(b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

3.30 The purpose of this section is to provide a summary of how these requirements have been met. This section should be read alongside the Consultation Statement (SD07).

Stages of Consultation

3.31 The Council has worked proactively to engage and involve as many people in the process as possible to ensure that the whole community has an opportunity to have their say and influence the Plan. The Council has exceeded both the requirements of national guidance and regulations listed above and their SCI. In line with our commitment to early and meaningful community engagement, extensive public consultation has preceded, and

informed, each stage of the Plan preparation. The Council has undertaken almost continuous consultation with our communities, and with other stakeholders including developers, landowners and infrastructure providers to input into the Plan's development.

3.32 The Council has consulted extensively on the Plan since 2005 and has undertaken 8 separate rounds of consultation on the Plan, as listed below.

Early Engagement Regulation 18	Stage 1	LDF Key Issues & Options Consultation	November 2005 - January 2006
	Stage 2	LDF Core Strategy Preferred Options Draft Consultation	December 2007 – February 2008
	Stage 3	LDF Sustainability Appraisal Scoping Report Consultation	May – July 2009
	Stage 4	LDF Alternative Approaches Consultation	15 September – 6 November 2009
	Stage 5	Local Plan Draft Core Strategy & Development Management Policies Consultation	1 August – 11 October 2013
	Stage 6	Local Plan Core Strategy Growth Options Consultation	19 May – 1 July 2016
	Stage 7	Local Plan Draft Core Strategy & Development Plan Consultation	7 August – 2 October 2017
Regulation 19	Stage 8	Local Plan Core Strategy & Development Plan Publication Draft Consultation	15 June – 27 July 2018

3.33 Although work on the Plan commenced as early as 2005, and consultation responses from these earlier stages have been taken into consideration, it was decided to rebase the Plan with a start date of 2015, to take account of the passage of time, updated evidence and changes to Government guidance. Consequently, this summary focuses on plan compliance with Regulations 18, 19 and 20 from 2015 onwards.

How Bodies and Persons were invited to make Representations

3.34 The Council has a comprehensive consultation database including residents, parish councils, elected representatives, community and voluntary groups, developers and businesses, infrastructure providers, government agencies and individuals. This database has grown significantly as the Plan has developed. Currently there are over 8000 consultees on the database.

Methods of Consultation (How were People Invited)

3.35 The SCI sets out how the Council will consult to achieve maximum coverage, inclusiveness and accessibility balanced against resource and time constraints. The following sets out how the Council has satisfied the requirements of regulation 18 and regulation 19.

3.36 The Consultation Statement (SD7) details the approach the Council undertook at each stage of plan preparation.

Appraisals

Sustainability Appraisal and Strategic Environmental Assessment

3.37 The purpose of the Sustainability Appraisal (SA) is to promote sustainable development through better integration of social, environmental and economic considerations into the preparation of planning documents. SAs incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC (the Strategic Environmental Assessment Directive) through assessing the effects of plans and policies on the environment, In addition to the social and economic effects.

3.38 Under Section 19(5) of the 2004 Act where an LPA is preparing a DPD it is mandatory for the Plan to be subject to a SA throughout its production, to ensure that it is fully consistent with, and helps to implement the principles of sustainable development. European Directive 2001/42/EC ("on the assessment of the effects of certain plans and programmes on the environment") (the Strategic Environmental Assessment or 'SEA Directive'), is transposed into United Kingdom law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the 'SEA Regulations'), and requires an environmental assessment of the Plan to be undertaken.

3.39 Whilst SA and SEA are distinct processes, the SEA is incorporated within the SA process. Government guidance (The Environmental Assessment of Plans and Programmes Regulations, 2004) advises that an integrated approach to SA and SEA should be pursued, to ensure that the SA process also meets the requirements of the SEA Directive and SEA Regulations.

3.40 As required by the relevant regulatory requirements, the process commenced with the production of an SA Scoping Report. This document (Sunderland Core Strategy SA & SEA Scoping Consultation (March 2016²²)) set out the methodology which underpins the SA of the Core Strategy and Development Plan. The main output was the production of an SA Framework, which comprised of a suite of 15 Sustainability Appraisal Objectives (SA Objectives) relevant to the Sunderland area which may affect (or be affected by) the Plan. These SA Objectives were accompanied by a set of guide questions to inform the assessment of the Plan components and any identified reasonable alternatives. This SA Framework has subsequently been tweaked in response to feedback from consultees, but it has not been necessary to make any substantive changes that would affect the SA methodology or conclusions.

²² SA Scoping Report (SP.63) [https://www.sunderland.gov.uk/media/20979/SP-63-Local-Plan-Sustainability-Appraisal-Scoping-Report-Consultation-2015-/pdf/SP.63_Local_Plan_Sustainability_Appraisal_Scoping_Report_Consultation_\(2015\).pdf?m=636806596039130000](https://www.sunderland.gov.uk/media/20979/SP-63-Local-Plan-Sustainability-Appraisal-Scoping-Report-Consultation-2015-/pdf/SP.63_Local_Plan_Sustainability_Appraisal_Scoping_Report_Consultation_(2015).pdf?m=636806596039130000)

- 3.41 Following the Scoping Report, an SA and SEA was undertaken on the Growth Options consultation document which outlined conceptual growth options (Baseline, Medium Growth and High Growth) and associated spatial strategy variants which could underpin the emerging Sunderland CSDP. The associated SA Report examined the relative sustainability implications of these growth options and spatial strategies. Following this consultation, the High Growth option was selected by the Council to underpin the emerging Plan, although significant changes in the evidence base now mean that a lower quantum of development would be required within the area to implement this option.
- 3.42 The outcomes of the Growth Options consultation and the SA were taken into consideration when preparing the Draft Plan.
- 3.43 The Draft Sunderland CSDP SA Report (2017)²³ identified, assessed and evaluated the likely significant effects of all substantive components of the Draft Sunderland CSDP. No significant adverse effects were predicted to arise, but the SA Report still identified a number of weaknesses within the emerging plan and therefore proposed a suite of mitigation and enhancement recommendations to address identified uncertainties and improve its sustainability performance. These recommendations were considered by SCC through the subsequent preparation of the Publication Draft Sunderland CSDP.
- 3.44 A final version of the SA was prepared for the Publication Draft of the Plan²⁴. This suggested further modifications to the plan which would improve its effectiveness. Where possible, these amendments were made to the Publication version of the Plan prior to it being published for consultation.

Legal Requirements for Habitats Regulation Assessment

- 3.45 Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Flora and Fauna – ("the Habitats Directive"²⁵), which is binding in English law and was transposed by the provisions of the Conservation of Habitats and Species Regulations 2010 ("Habitats Regulations") provides legal protection for habitats and species of European importance. Article 6 of this Directive introduced the requirement to undertake an assessment (a Habitats Regulations Assessment (HRA) of the implications of proposed land use plans on the integrity of nature conservation sites of European importance. Such sites are known as Natura 2000 sites, and include Special Areas of Conservation (SACs), candidate Special Areas of Conservation (cSACs), Special Areas of Protection (SPAs) as classified under the EC Birds Directive (2009/147/EC), potential Special Areas of Protection (pSPAs), Ramsar sites and Offshore Marine Sites (OMSs).
- 3.46 Regulation 102 of the Habitats Regulations specifies that an assessment needs to be carried out by the plan making authority, before the Plan is given effect, to determine whether the Plan is likely to have a significant effect on any European site. In making such an assessment, the plan making authority must consult the appropriate nature conservation body and have regard to any such representations made by the body within such reasonable time as the authority specifies. The authority must also, if they consider it appropriate, take the opinion of the general public, and if they do so, take such steps for that purpose as they consider necessary. If the conclusion is reached that it will have a significant effect or such

²³ [https://www.sunderland.gov.uk/media/19028/Sustainability-Appraisal-2017-pdf/2_Sustainability_Appraisal_\(2017\).pdf?m=636371793099070000](https://www.sunderland.gov.uk/media/19028/Sustainability-Appraisal-2017-pdf/2_Sustainability_Appraisal_(2017).pdf?m=636371793099070000)

²⁴ https://www.sunderland.gov.uk/media/20390/Sustainability-Appraisal-2018-pdf/02_CSDP_Publication_Draft_SA.pdf?m=636644853991600000

²⁵ http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm

effects are likely, on a European site then an appropriate assessment must be carried out to assess the implications for any such site and its conservation objectives.

- 3.47 The purpose of a HRA is to determine whether or not significant effects on European sites are likely and to suggest ways in which they could be avoided. Under the provisions of the Habitats Directive, consent can only be granted for such a plan if, as a result of the HRA, it can be demonstrated that the integrity of the sites will not be adversely affected or, where adverse impacts are anticipated, there is shown to be no alternative solutions and imperative reasons of overriding public interest for the plan to go ahead.
- 3.48 Sunderland undertook an HRA in 2017 to support the Draft Plan and updated the HRA in 2018 to support the publication draft of the Plan. The HRA identified any likely significant effects which may arise as a result of implementation of the Plan. The main effect was highlighted to be disturbance of birds caused by higher number of dog walkers using the coast. The assessment concluded that if the proposed mitigation measures are adopted, the Plan would not have an adverse effect on the integrity of the Northumbria Coast SPA/Ramsar sites or Durham Coast SAC, either alone or in combination with other plans and projects.
- 3.49 Following representations from Natural England on the HRA, the Council has undertaken further work on the HRA report in consultation with Natural England. The revised version of the HRA has been submitted alongside the Plan.²⁶

Equalities Impact Assessment and Health Impact Assessment

- 3.50 In accordance with best practice the Council has prepared an Equality Impact Assessment (EqIA)²⁷ and Health Impact Assessment (HIA)²⁸. Therefore the Councils have fulfilled their public sector equality duty requirement under the Equality Act 2010, by undertaking an Equality Impact Assessment.

²⁶ HRA (SD10) [https://www.sunderland.gov.uk/media/21026/SD-10-Report-to-Inform-Habitats-Regulations-Assessment-2018-/pdf/SD.10_Report_to_Inform_Habitats_Regulations_Assessment_\(2018\).pdf?m=63680842801250000](https://www.sunderland.gov.uk/media/21026/SD-10-Report-to-Inform-Habitats-Regulations-Assessment-2018-/pdf/SD.10_Report_to_Inform_Habitats_Regulations_Assessment_(2018).pdf?m=63680842801250000)

²⁷ EIA [https://www.sunderland.gov.uk/media/20853/SD-14-Equality-Analysis-for-Core-Strategy-and-Development-Plan-2018-/pdf/SD.14_Equality_Analysis_for_Core_Strategy_and_Development_Plan_\(2018\).pdf?m=636802937147470000](https://www.sunderland.gov.uk/media/20853/SD-14-Equality-Analysis-for-Core-Strategy-and-Development-Plan-2018-/pdf/SD.14_Equality_Analysis_for_Core_Strategy_and_Development_Plan_(2018).pdf?m=636802937147470000)

²⁸ HIA [https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_\(2017\).pdf?m=636803846820730000](https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_(2017).pdf?m=636803846820730000)

3. Soundness



4. Soundness

- 4.1 This section of the Statement demonstrates how policy within the Plan is considered to be sound.
- 4.2 The LPA should submit a plan for examination which it considers is “sound” – namely that it is:
- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development
 - Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence
 - Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities ; and,
 - Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 4.3 This section of the report will demonstrate how the Plan meets these tests and therefore is a ‘sound’ Plan. The section is sub-divided into the chapters contained in the Plan

5. Spatial Vision and Strategic Priorities

Spatial Vision

- 5.1 Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities. The Core Strategy and Development Plan is an opportunity for the LPA to set out a positive vision for the area, but the spatial vision needs to be realistic about what can be achieved and when (including in relation to infrastructure).
- 5.2 Sunderland's Plan is the spatial manifestation of the wider ambitions and goals of the Council and its partners. Throughout the preparation of the Plan, there have been various iterations of the spatial vision to respond to changes circumstances in Sunderland. The spatial vision builds on a number of corporate visions including;
- Sunderland's Economic Masterplan²⁹,
 - Sunderland's Corporate Plan³⁰,
 - Sunderland's Housing Strategy³¹, and
 - Sunderland Transforming our City, The 3,6,9 Vision³²
- 5.3 Building upon these visions, the Plan sets out a more detailed spatial vision of the type of place Sunderland will be by 2033. This spatial vision seeks to ensure that Sunderland will be a more prosperous, attractive and sustainable place to live and work, with improved quality of life and thriving communities. The spatial vision seeks to ensure that all communities are thriving and attractive places to live and that more sustainable patterns of living are achieved.
- 5.4 The vision is derived from key issues identified in the evidence (as listed in Appendix 1) and as summarised in Chapter 2 of the Plan.
- 5.5 Since consulting on the Publication Draft (SD01), in response to the representations raised by Persimmon Homes (PD3901), Karbon Homes (PD3380), Historic England (PD90), M&G Estates (PD3597) and the Mineral Products Association (PD4327 & PD4386) the Council has proposed a number of minor modifications as set out in the Schedule of Modifications (M4, M5, M7, M8, M9, M10 & M12). The modification are included in the Spatial Vision below.

Spatial Vision 2033

By 2033, Sunderland will be a place that:

- has a population in the order of 290,000 people;
- increased the working age population;
- is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations;
- is more socially, economically and environmentally sustainable;
- has improved its social infrastructure, with additional healthcare, education and community facilities;
- has easy access to useable open space, leisure and recreation;
- has vibrant, well supported, town, district and local centres that are places to meet as well as shop;
- offers a mix of good quality housing, both market and affordable of the types, sizes and tenures that meet the needs and demands of existing and future communities;
- offers residents the opportunity to live in sustainable communities accommodating all ages and abilities;
- has a Urban Core that is revitalised and has become a destination of choice, a place for people to live, work and spend their leisure time;

²⁹ https://www.sunderland.gov.uk/media/20930/SP-30-Sunderland-Economic-Masterplan/pdf/SP.30_Sunderland_Economic_Masterplan.pdf?m=636803131897070000

³⁰ https://www.sunderland.gov.uk/media/19258/Corporate-Plan-2016-2020/pdf/Corporate_Plan_2016-20.pdf?m=636407195031930000

³¹ [https://www.sunderland.gov.uk/media/20916/SP-13-Housing-Strategy-for-Sunderland-2017-2022-2017-/pdf/SP.13_Housing_Strategy_for_Sunderland_2017-2022_\(2017\).pdf?m=636803123165700000](https://www.sunderland.gov.uk/media/20916/SP-13-Housing-Strategy-for-Sunderland-2017-2022-2017-/pdf/SP.13_Housing_Strategy_for_Sunderland_2017-2022_(2017).pdf?m=636803123165700000)

³² https://www.sunderland.gov.uk/media/20931/SP-31-Sunderland-Transforming-Our-City-The-3-6-9-Vision/pdf/SP.31_Sunderland_Transforming_our_City_-_The_3_6_9_Vision.pdf?m=636803132329670000

- is open to business and is responsive to the changing needs and demands of our growing economy;
- is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills;
- is entrepreneurial, a University City at the heart of a low carbon regional economy;
- which creates new and diverse job opportunities particularly in advanced manufacturing;
- values the University of Sunderland and Sunderland College who play a vital role in attracting the best minds and ensuring a skilled workforce that choose to live here;
- has a high quality natural, built and historic environment;
- has a network of green infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all;
- is resilient to climate change, has maximised the opportunities for renewable energy, embraced sustainable design principles and has reduced the impacts of flooding on homes and businesses; ~~and has excellent transport links and sustainable access for visitors, businesses and residents;~~ and
- has excellent transport links and sustainable access for visitors, business and residents.

Spatial Priorities

- 5.6 The NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. It suggests that this should include strategic policies to deliver:
- the homes and jobs needed in the area;
 - the provision of retail, leisure and other commercial development;
 - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - the provision of health, security, community and cultural infrastructure and other local facilities; and
 - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 5.7 To assist in the delivery of this vision, 13 strategic priorities have been identified in the Plan. The plan was then structured around the themes of the Strategic Priorities.
- 5.8 Since consulting on the Publication Draft (SD01), in response to the representations raised by the Mineral Products Association (PD4327 & PD4386), Historic England (PD90) and M&G Retail (PD3597), the Council has proposed a number of modifications as set out in the Schedule of Modifications (M7, M8, M9, M10, M11 and M12). The modifications are illustrated below.

Spatial Strategy	Strategic Priority 1. To deliver sustainable economic growth and to meet objectively assessed needs for employment and housing, in particular through providing opportunities for young economically active age groups and graduates.	SP1, SP2, SS1, SP3, SS2, SS3, SS4, SS5, SS6, SS7, SP7, SP8, H1, H2, H3, H4, H6, EG1, EG2, EG4, EG5, VC1, VC5, WWE6, WWE7, SP11.
	Strategic Priority 2. To identify land we need for development in the right locations so we can protect our most vulnerable assets and while ensuring we meet our sustainable growth ambitions.	SP1, SP2, SS1, SP3, SS2, SS3, SP4, SS4, SP5, SS5, SS6, SP6, SS7, SP8, H1, H2, H3, H4, H6, EG1, EG2, EG3, EG4, EG5, VC1, VC3, VC4, NE1, NE2, NE4, NE6, NE7, NE8, NE9, NE11, NE12, WWE6, WWE7, WWE8, WWE9, SP11, M1.
Healthy Safe	Strategic Priority 3.	SP1, SP2, SP3, SP4, SP7,

Communities	To promote healthy lifestyles and ensuring the development of safe and inclusive communities, with facilities to meet daily needs that encourage social interaction and improve health & wellbeing for all.	HS1, HS3, HS4, H1, VC1, VC4, VC5, BH1, BH2, NE1, NE4, NE6, NE8, WWE1, WWE2, WWE3, WWE4, WWE10, SP10, ST1, ST3, ID1, ID2.
Homes	Strategic Priority 4. To provide a range and choice of accommodation, house types and tenures to meet the diverse needs of current and future residents.	SP1, SP2, SS1, SP3, SS2, SS3, SP4, SS4, SP5, SS6, SP6, SS7, SP7, SP8, H1, H2, H3, H4, H5, H6, H7, <u>SP11</u> .
Economic Growth	Strategic Priority 5. To provide a wide portfolio of employment sites to support the development of key employment sectors and expand the opportunities for new office development.	SP1, SP2, SS1, SP3, SP4, SS5, SP5, SP6, EG1, EG2, EG3, EG4, EG5, EG6, <u>SP11</u> .
Vitality of Centres	Strategic Priority 6. To <u>improve support</u> the vitality and economic performance of the Urban Core and designated centres.	SP1, SP2, SS1, SP3, SP6, EG5, VC1, SP9, VC2, VC3, VC4..
Built and Historic Environment	Strategic Priority 7. To protect, sustain and enhance the quality of our built and historic environment and the delivery of distinctive and attractive places.	SP2, VC1, BH1, BH3, BH7, BH8, ID1, ID2.
Natural Environment	Strategic Priority 8. 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.	SP1, SP5, SS6, SP6, BH1, BH2, NE1, NE2, NE3, NE4, NE6, NE7, NE8, NE9, NE10, NE11, NE12, WWE2, WWE4, WWE5, M4, ID1, ID2.
Water, Waste and Energy	Strategic Priority 9. To adapt to and minimise the impact of climate change by reducing carbon emissions, maximising the use of low carbon energy solutions and seeking to reduce the risk/impact of flooding.	BH1, BH2, NE1, WWE1, WWE2, WWE3, WWE4, WWE5, WWE10.
	Strategic Priority 10. To manage waste as a resource and minimise the amount produced and sent to landfill.	WWE5, WWE6, WWE7, WWE8, WWE9, WWE10.
Transport	Strategic Priority 11. To promote sustainable and active travel and seek to improve transport infrastructure to ensure efficient, sustainable access.	SS5, SS6, SP10, ST1, ST2, ST3, ID1, ID2.
Minerals	Strategic Priority 12. To manage the city's mineral resources ensuring the maintenance of appropriate reserves to meet needs.	WWE6, WWE7, WWE8, WWE9 <u>SP11, M1, M2, M3</u>
Infrastructure	Strategic Priority 13. To ensure that the city has the infrastructure in place to support its future growth and prosperity.	ID1, ID2.

6. Spatial Strategy

- 6.1 The underlying principle of national policy is to deliver sustainable development to secure a better quality of life for everyone now and for future generations. All the policies within this Plan contribute towards achieving sustainable development.
- 6.2 Sustainable development is considered to be the golden thread running through this Plan. For the purposes of this Plan, the definition of sustainable development is contained in National Planning Policy Framework (NPPF). The NPPF emphasises the economic, social and environmental roles which the planning system must perform in order that sustainable development can be delivered. The three roles cannot be undertaken in isolation as they are mutually dependent and this Plan will seek to ensure that these roles are sought jointly and concurrently wherever possible. This Plan will positively seek opportunities to meet the development needs of Sunderland unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.3 This Plan seeks to provide a flexible policy framework to remove obstacles where appropriate and encourage sustainable development. The Plan should be read as whole and all policies taken into consideration if relevant.
- 6.4 Climate change is recognised as one of the most significant threats facing the 21st Century and as such, there are unprecedented challenges to the environment, economy and the future security of energy. Sunderland Partnership and the Council recognise that climate change is one of the greatest environmental challenges and the Climate Change Action Plan sets out how the city is going to reduce its energy consumption, emissions of carbon dioxide (CO₂) and other greenhouse gases, which are known to be the main cause of climate change. The spatial strategy and all policies in the Plan will seek to reduce the impacts of climate change.
- 6.5 This spatial strategy chapter sets out policies for the overall strategy for development, growth and investment in Sunderland to 2033. It also contains policies for each of the spatial sub- areas, for strategic allocations and it identifies locations where development should take place in order to create sustainable neighbourhoods and deliver our vision and objectives.
- 6.6 The delivery of the spatial strategy is illustrated on the Key Diagram (Figure 2) contained within the Plan.

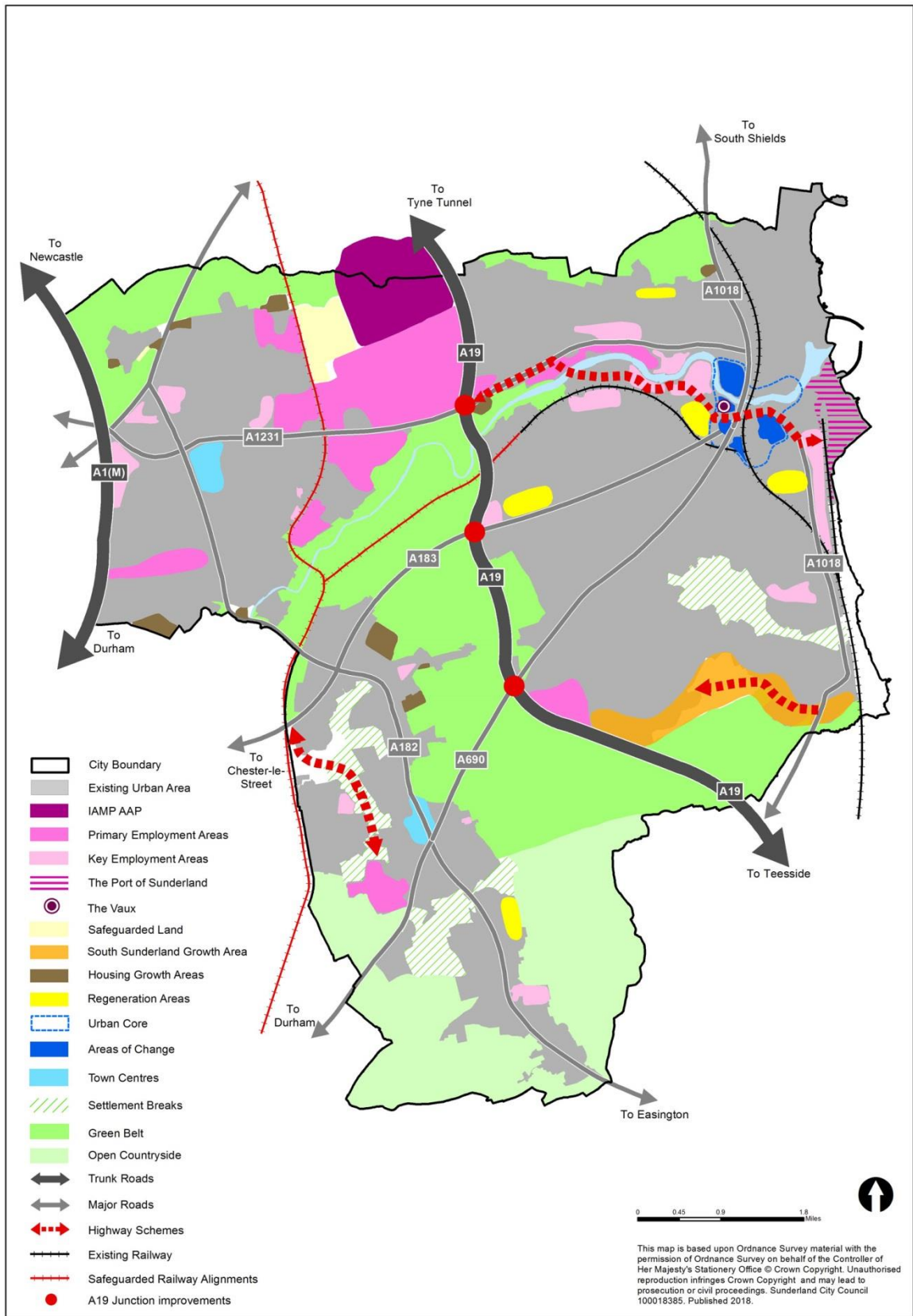


Figure 2 Key Diagram

SP1 Spatial Strategy

- 6.7 In order to meet identified development needs, the spatial strategy sets out the scale and distribution of new development for the Plan period up to 2033. Through the spatial strategy, the Plan seeks to enable sustainable economic growth. By 2033, it is the aim of the strategy to ensure that the city offers the right type of new homes in the right places and creates opportunities for job growth. The strategy seeks to align economic growth in the city with the housing offer, to ensure that past trends of out-migration are rebalanced. This will ensure the sustainability of our area into the future as a place to both live and work.

SP1 Spatial Strategy

1. To support sustainable economic growth and meet people's needs, the council, working with local communities, its partners and key stakeholders will:
 - i. deliver at least 13,410 new homes and create sustainable mixed communities which are supported by adequate infrastructure;
 - ii. create at least 7,200 new jobs, particularly in key growth sectors;
 - iii. develop at least 95ha of employment land;
 - iv. deliver at least 45,400m² new comparison retail development; and
 - v. ensure that sufficient physical, social and environment infrastructure is delivered to meet identified needs.
2. The spatial strategy seeks to deliver this growth and sustainable patterns of development by:
 - i. supporting the sustainability of existing communities through the growth and regeneration of Sunderland's sub areas including the Urban Core (Policy SP2); Washington (Policy SP3); North Sunderland (Policy SP4); South Sunderland (Policy SP5); and the Coalfield (Policy SP6);
 - ii. delivering the majority of development in the Existing Urban Area;
 - iii. emphasising the need to develop in sustainable locations in close proximity to transport hubs.
 - iv. encouraging higher density development around and in close proximity to transport hubs;
 - v. delivering the right homes in the right locations through the allocation of homes in the A&D Plan and amending the Green Belt boundary to allocate Housing Growth Areas;
 - vi. protecting Sunderland's character and environmental assets including Settlement Breaks, greenspaces, Open Countryside and Green Belt; and
 - vii. minimising and mitigating the likely effects of climate change.

Positively Prepared

Vision and Strategic Priorities

- 6.8 This policy will deliver the spatial vision and strategic priorities by establishing the overarching spatial strategy for the city and will help to deliver most aspects of the vision, in particular the homes to help grow the population and increase the size of the working age population; providing vibrant, well supported designated centres and help to revitalise the Urban Core; new and diverse job opportunities; protecting a network of green infrastructure; and providing resilience to climate change.

6.9 Policy SP1 will help to deliver Strategic Priorities 1, 2, 3, 4, 5, 6 and 8.

Draft Plan Comments

6.10 The following issues were raised against the spatial strategy;

- Would like the metro zone to be expanded.
- Challenged the economic strategy to promote development in the Urban Core rather than Washington.
- Concerned about the loss of Green Belt land.
- Concerned development in Green Belt will have an impact on the road network.
- The assumption for economic growth is not considered to be realistic.
- Barratt David Wilson Homes consider the Plan to be unsound as distribution of housing growth and economic growth is not aligned. They request Washington to be designated as a "Principle Growth Settlement" and the Spatial Strategy should allocate Washington Meadow as a Housing Release Site rather than safeguarded land.
- Town End Farm Partnership considers this strategy to be too optimistic and not justified. They also raise concerns that the strategy does not reflect the update to the IAMP AAP.
- The EA suggested it would be worth including some additional text on the viability work that has concluded that some brownfield SHLAA sites previously considered developable have since been discounted due to viability.

How Issues Have Been Taken into Account at Publication Draft

6.11 In response to the comments raised:

- Policy SP10 includes reference to improvements to the Metro and rail network. This includes extensions and new stations.
- The number of Housing Growth Areas identified within the Publication Draft of the Plan has been reduced from 15 to 11.
- The Council has prepared a detailed Transport Assessment (SD.51³³) which considers the potential impacts of development on the transport network. Where necessary, appropriate mitigation has been identified within the Infrastructure Delivery Plan to address the impacts of the Plan. A further two Addendums to the Transport Assessment (SD.52³⁴ & SD53³⁵) have been prepared to update the sites to reflect the latest evidence in the SHLAA (SD22a-e³⁶) and the Publication Draft of the Plan.

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[https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

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[https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_\(2018\).pdf?m=636803106569000000](https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_(2018).pdf?m=636803106569000000)

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[https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_\(2018\).pdf?m=636803107219430000](https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_(2018).pdf?m=636803107219430000)

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[https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

[https://www.sunderland.gov.uk/media/20861/SD-22a-Strategic-Housing-Land-Availability-Assessment-Appendix-L-Sunderland-North-Site-Assessments-2018-pdf/SD.22a_Strategic_Housing_Land_Availability_Assessment_Appendix_L_Sunderland_North_Site_Assessments_\(.pdf?m=636802946141500000](https://www.sunderland.gov.uk/media/20861/SD-22a-Strategic-Housing-Land-Availability-Assessment-Appendix-L-Sunderland-North-Site-Assessments-2018-pdf/SD.22a_Strategic_Housing_Land_Availability_Assessment_Appendix_L_Sunderland_North_Site_Assessments_(.pdf?m=636802946141500000)

https://www.sunderland.gov.uk/media/21009/SD-22b-Appendix-M-Urban-Core-Site-Assessments/pdf/SD.22b_Appendix_M_Urban_Core_Site_Assessments.pdf?m=636808162700200000

https://www.sunderland.gov.uk/media/21007/SD-22c-Appendix-N-Sunderland-South-Site-Assessments/pdf/SD.22c_Appendix_N_Sunderland_South_Site_Assessments.pdf?m=636808161220570000

https://www.sunderland.gov.uk/media/21006/SD-22d-Appendix-O-Washington-Site-Assessments/pdf/SD.22d_Appendix_O_Washington_Site_Assessments.pdf?m=636808160287970000

https://www.sunderland.gov.uk/media/21008/SD-22e-Appendix-P-Coalfield-Site-Assessments/pdf/SD.22e_Appendix_P_Coalfield_Site_Assessments.pdf?m=636808161932900000

https://www.sunderland.gov.uk/media/21008/SD-22e-Appendix-P-Coalfield-Site-Assessments/pdf/SD.22e_Appendix_P_Coalfield_Site_Assessments.pdf?m=636808161932900000

- The Plan has been updated to include strategic policies for each of the spatial areas, detailing the growth which will be supported.
- In response to the concerns raised by Barratt David Wilson Homes, the Plan allocates a number of Housing Growth Areas within the Washington sub-area. However the Council did not consider it necessary to allocate the Washington Meadows site to meet housing needs within this Plan period. Notwithstanding the above, the site has been identified as safeguarded land through Policy SS3.
- In response to comments expressed by Town End Farm Partnership, the Council has amended the publication draft to reflect that the IAMP AAP has been adopted.
- The Spatial Portrait section of the Plan has been amended to make reference to the viability challenges in delivering some brownfield land within the city.

Publication Draft Comments

6.12 The following issues were raised against the spatial strategy;

- Hellens suggested that Paragraph 4.24 should be amended to make clear that not all development in Settlement Breaks would have major impacts (PD4664).
- Friends of Sunderland Green Belt (PD3014 & PD3015) objects to the uplifting of the OAN to support economic growth and considers there is no evidence that there is a housing shortfall. They expressed concerns that job numbers are based on one data source and Government data is not used and there is an over-reliance on the IAMP, which may not deliver as anticipated.
- Landowners, developers and the HBF (PD1182) generally support the Policy (PD4207). Persimmon Homes (PD3905), Hellens Group (PD4712), Story Homes (PD5556), Taylor Wimpey (PD3470) and Esh Developments (PD1827) supports the minimum target and commend the Council for setting a housing requirement above the standardised methodology, which is required to support economic growth. However, Persimmon considers the housing requirement should be increased to support an uplift in Household Representative Rates for 25 to 44 year olds and to help the Council address the affordable housing imbalance.
- Karbon Homes (PD3382) supports the housing requirement set out in policy SP1. Karbon recognise that this exceeds the Government's indicative assessment using the standardised methodology, but this is a baseline figure which should be a minimum. Karbon support the housing growth areas. Miller Homes (PD889) support the housing figure but are disappointed that it's not the same as the previous draft.
- The Central Gospel Hall Trust (PD145) 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. The spatial strategy for Washington is supported. The amendments made to the Policies Map are also supported.
- Siglion (PD2912) request additional sites to be included in the SHLAA.
- Northumbrian Water (PD2681) 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. Northumbrian Water suggests the former Fulwell Reservoir site for housing and propose it for inclusion in the Plan.
- The Trustees of Athenaeum Pension Scheme (PD39, PD40) agree that an amendment to the Green Belt boundary is the most sustainable option. Additionally agree that exceptional circumstances have been demonstrated. The Trustees of Athenaeum Pension Scheme 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.

- Harworth Estates (PD2005, PD2126) supports proposed economic growth in the Plan including the IAMP and allocation for 95 hectares of employment land but do not consider there are exceptional circumstances to amend the Green Belt.
- South Tyneside Council (PD4363) supports the spatial strategy.
- Getten Construction (PD2616) considers the housing target is too low and should be increased to address the imbalance. The developer also suggests an alternative site at Albany Park to be allocated for housing development.
- Urban and Civic (PD855) considers the policy only deals with the theoretical quantitative capacity for new comparison retail floorspace.
- Thompsons of Prudhoe (PD191) consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The location of Springwell Quarry in the Green Belt would potentially limit the future development of the site by limiting the number of structures and development that can occur.
- Burdon Lane Consortium (PD2061) welcomes the spatial strategy, which includes the SSGA which is a long standing commitment by Sunderland City Council. The Consortium believe that focussing growth in this area represents a sound and sustainable approach.
- Highways England suggested further modelling work is needed on the Strategic Road Network.
- NHS Sunderland CCG (PD66) suggests that the policy is amended to ensure that the impacts of development are mitigated and suggests an additional criterion to make it sound. They would also request the IDP to be updated to include health care (PD67).
- Sunderland Civic Society (PD866) request clarity of the flexibility allowance.
- CPRE North East considers there to be a discrepancy as 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 taking such a significantly different approach from the standardised method. Additionally, Sunderland Green Party (PD4461) objects to the policy as the exceptional circumstances have not been justified for Green Belt incursion. The Party suggests the OAN is an inflated figure (weighted and using outdated methodology) and not justified, especially with latest population figures being low.
- The Minerals Products Association objects to the policy as it had failed to include reference to minerals within the spatial strategy.
- A significant number of Springwell Village and Seaburn residents and other members of the public responded to object to Policy SP1 for a range of reasons, including:
 - the Council has not produced evidence to support building over 13,000 homes when the government requires 7610;
 - need can be met on brownfield land;
 - there is sufficient land in brownfield register to deliver necessary housing;
 - inadequate consideration has been given to bringing empty homes into use.
 - the Council has not used the latest population projections. The requirement is based on the older 2014 based population projections, rather than the 2016 based projections which are lower;
 - the uplift to the housing requirement is predicated on one employment site – the IAMP, whose workers will be spread across a wide area;
 - there is overprovision of housing across North East authorities as there is double counting of housing numbers across local authorities;
 - there is no evidence or justification for economic growth intervention required, due to higher GVA in the north east;

- there are enough unemployed workers in Sunderland to fill the jobs growth and there is double counting of workforce growth;
- consented housing schemes pre-empted the Core Strategy;
- exceptional circumstances have not been demonstrated to release Green Belt land;
- 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.
- 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;
- o The housing densities used are too low;
- o Experian assumptions are not convincing and proposals for mainly executive housing is not consistent with the NPPF;
- o There is uncertainty over IAMP due to Brexit;
- o Development should be focused in the city centre;
- o Housing should be provided for first time buyers and the elderly;
- o House prices are static so there's no evidence of demand;
- o 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.
- o need for retail floor space is too high.
- o consultation has been inadequate;
- o the plan has not been amended to reflect previous objections.

How Issues Have Been taken into account prior to Submission (Proposed Modifications)

- 6.13 In response to the representation raised by Hellens (PD4664) the Council has proposed an additional modification as set out in the Schedule of Modifications.
- 6.14 The Council has taken into consideration the representations and are not proposing to make any further modifications to this policy. The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper (SD.33).
- 6.15 The Council has carefully considered the alternative sites put forward through the Green Belt Assessment (SD.29-33³⁷) and Boundary Review; however these have been discounted for various reasons as set out within the evidence base. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018) (SD.24). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

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[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)
https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32_Green_Belt_Assessment_-_2018_Addendum.pdf?m=636802953199630000
https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

6.16 The Council has prepared an Infrastructure Delivery Plan (SD.59³⁸), which has been informed by a Transport Assessment (SD.51-53) and Education Plan (SD.62³⁹). This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

Duty to Cooperate

6.17 The Duty to Cooperate Statement (SD.11⁴⁰) provides further detail on the duty-to-cooperate issues identified when preparing Policy SP1.

6.18 During the Draft Plan consultation, Durham County Council, Gateshead Council and Newcastle City Council requested that further information is provided regarding the assumptions over commuting and migration rates associated with the levels of growth proposed within the Plan. Gateshead Council also requested that further clarity was provided over the potential impact of the IAMP on housing need.

6.19 The Council has held regular meetings with neighbouring authorities, which included discussions on these matters. In addition, specific detailed discussions have been held with Gateshead Council and Durham County Council regarding the modelling used in the calculation of the Objectively Assessed Housing Need. In response to these meetings, the Council updated its Housing Requirement to ensure that it is based on fixed commuting rates, which is consistent with the approaches being adopted by neighbouring authorities. In addition, the IAMP Housing Impact Paper was updated to reflect comments made by Gateshead Council

6.20 The housing requirement within the Plan includes an uplift to support economic growth, including the IAMP, however it is agreed that additional work will be undertaken to identify the potential impacts of the IAMP, as the scheme progresses. These impacts will be taken into consideration as part of future plans, when there is more certainty over the speed of delivery of the IAMP and evidence of its impacts is available.

6.21 As a result of these meetings, Durham County Council, Gateshead Council and Newcastle City Council agree that Sunderland is a self-contained Housing Market Area and that the levels of housing growth being proposed within the Plan will not impact upon their proposals which are already contained within an adopted plan or will be based on the Local Housing Need methodology.

6.22 With regard to economic growth, the Council have worked jointly with South Tyneside Council to prepare a Joint Area Action Plan (AAP) (SP.9)⁴¹ to support the development of a new International Advanced Manufacturing Park on land to the north of the Nissan complex. This is a key project for the delivery of the North East Local Enterprise Partnership's Strategic Economic Plan (SP.33). The AAP was formerly adopted by both local authorities in November 2017. Jobs Growth. When preparing the Employment Land

³⁸[https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

³⁹[https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

⁴⁰[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴¹[https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-/pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_\(2017\).pdf?m=636803121719830000](https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-/pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_(2017).pdf?m=636803121719830000)

Review (SD.37 & SD.37A⁴²), a workshop was held with local stakeholders including officers from neighbouring authorities to ensure that any cross boundary issues were addressed.

- 6.23 Once it became clear that the Council would be unable to meet its Objectively Assessed Housing Needs in full without amending Green Belt boundaries, the Council wrote to neighbouring authorities to ascertain whether they would be able to accommodate any of Sunderland’s housing need without requiring amendment to their own Green Belt boundaries. In response to this request, Gateshead Council, Durham County Council and South Tyneside Council all responded to advise that they would be unable to meet any additional growth from Sunderland without revisions to their own Green Belt boundaries.
- 6.24 In regards to Green Belt, the Council liaised closely with Durham County Council, Gateshead Council and South Tyneside Council when preparing the methodology for its Green Belt Assessment to ensure a consistency of approach. Detailed discussions were held with Gateshead Council, Durham County Council and South Tyneside Council regarding the potential impact of proposed Housing Growth Areas on neighbouring authorities and the impact on the Green Belt. Gateshead Council expresses concern regarding the impact of the Housing Growth Areas around Springwell Village and to the north of Washington on the Green Belt separation to Gateshead and Eighton Banks. Despite every effort, it has not been possible to reach agreement on this matter. In response to the consultation on the Draft Core Strategy, Durham County Council highlighted the potential impact of sites HGA5 and HGA6 on Lambton Registered Park and Garden, however following amendments to the Plan these concerns have been addressed. South Tyneside have not raised any specific representations on the Green Belt impact, but would like further discussions if the land to the east of Washington was to be proposed for development.

Sustainability Appraisal (2017)

- 6.25 The following table is a visual summary of the detailed assessment provided in SA Appendix (SD.12)⁴³. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

- 6.26 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	To ensure the release of Green Belt land under this policy does not undermine this SA Objective or conflict with the policy requirement to direct development to sustainable locations, in the next iteration of the emerging Sunderland CSDP this policy should be amended to insert the word “inappropriate”	The policy has been amended accordingly. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.

⁴² [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)
[https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_\(2016\).pdf?m=636803862875470000](https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_(2016).pdf?m=636803862875470000)

⁴³ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

	before “development” within criteria 4 and to include a cross-reference to assessment criteria within Policy E11 – Green Belt.	
SA8: Land Use and Soils	In the next iteration of the emerging Sunderland CSDP, to ensure the release of Green Belt land under this policy does not undermine this SA objective or conflict with the policy requirement to direct development to sustainable locations, the policy should be amended to insert the word “inappropriate” before “development” within criteria 4 and to include a cross-reference to assessment criteria within Policy E11 – Green Belt.	The Policy has been amended accordingly. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.
SA10: Flood Risk and Coastal Erosion	To ensure that this policy directly contributes to this SA objective, in the next iteration of the emerging Sunderland CSDP the policy should be expanded to direct inappropriate development, as defined within the NPPF and Planning Policy Guidance, away from flood risk areas in the next iteration of the emerging Sunderland CSDP.	This is unnecessary as it would repeat the NPPF. Through the preparation of the Plan we have sought to direct development away from Flood Risk Areas. None of the site allocations within the Plan are located within Flood Zones 2 and 3, with the exception of the Port of Sunderland, where the Policy has been amended to make clear that any development proposal would be required to meet the sequential and exceptions tests, where necessary.
SA11: Air	To address the identified deficiency regarding consideration of environmental and potential flood risk impacts associated with the transport infrastructure projects supported by policy CC2– Connectivity and Transport Network it is recommended that this policy should be expanded to reference the need for these projects to accord with other relevant planning policies and to demonstrate that they would not give rise to any unacceptable environmental or amenity impacts.	All policies of the plan should be read together. This has been made clear in the introductory sections, so no need to specifically reference.
Cumulative Effects on SA Objectives	To ensure consistency between policy SS3 and subject specific policies, as well as to ensure that this policy does not undermine SA objectives, the policy should be expanded to define “sustainable locations” with reference to sustainability and environmental issues In the next iteration of the emerging Sunderland CSDP.	The wording of the Policy is consistent with that of Paragraph 156 of the draft NPPF, which also provides no further clarity on what is considered to be a sustainable location. Whether a development is located in a sustainable location will be determined on site-by-site basis.
Cumulative Effects on SA Objectives	In the next iteration of the emerging Sunderland CSDP, to ensure that the release of Green Belt land under Policy SS3 does not undermine multiple SA objectives or conflict with the policy requirement to direct development to sustainable locations, the	The Policy has been amended accordingly. The Plan should be read as whole and it is therefore not deemed necessary to cross

	<p>policy should be amended to insert the word "inappropriate" before "development" within criteria 4. For the same reason policy SS3 should also be amended to include appropriate cross-references to assessment criteria within relevant subject specific policies including Policy E11 – Green Belt, E14 – Landscape Character, E15 – Creating and Protecting Views, CC1 – Sustainable Travel, HWSS1 - Health and Wellbeing and E17 – Quality of Life and Amenity.</p>	<p>reference to other policies within the Plan.</p>
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Sustainability Appraisal (2018)

6.27 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.6)⁴⁴. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	++	+	~	++	+	++	++	+	+	+	++	~	+	+

6.28 The SA made the following recommendation for changes to be made to the publication draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
<p>Whilst the supporting text to this policy focuses on climate change mitigation and adaptation, the policy itself does not mention climate change. To address this inconsistency and enhance the environmental performance of Policy SP1, the policy should be expanded to include a reference to climate change in the context of the identified need to develop in sustainable locations (criterion 2c).</p>	<p>Recommendation agreed and implemented.</p>
<p>The supporting text should be expanded to provide a brief explanation of the A&D plan referred to in Policy SP1 and to make clear that additional sites not currently proposed for allocation within the CSDP will be considered for allocation through its preparation.</p>	<p>Recommendation agreed and implemented.</p>
<p>The supporting text (or the policy itself) should be expanded to define the "key growth sectors" which Policy SP1 seek to support. To further enhance the contribution of Policy SP1 to SA Objective 3, the policy could be expanded to direct employment generating development to particular locations (in the same high level way as the policy already does this for housing, with the details reserved to subsequent subject policies).</p>	<p>Text has been amended to say that it will support 7,200 jobs, particularly in the Key Growth Sectors, to make clear that it is total jobs growth rather than just in the Key Growth Sectors. The Economic Growth chapter provides further detail on what the key employment sectors are considered to be.</p>
<p>To enhance the contribution of this policy to SA Objective 11 the policy could be expanded to include a reference to the need to safeguard and improve air quality through planning and development decisions. This would not duplicate</p>	<p>This seems to be too specific for a strategic policy. We have however already included reference to minimising the impacts of climate</p>

⁴⁴ https://www.sunderland.gov.uk/media/20852/SD-6-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-Non-Technical-Summary-2018-/pdf/SD.6_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_Non-Technical_Summary.pdf?m=636802912395830000

criteria provided in other subject policies but would acknowledge the need to take account of air quality as a spatial strategy matter rather than only in development management contexts.

change, which does cross over with air quality.

Justified

6.29 A comprehensive and robust evidence base has been developed to establish growth projections which underpin our strategic approach to the quantity of housing provision and economic growth set out in Policy SP1.

Delivering at least 13,410 new homes

6.30 In accordance with the NPPF the Council is required 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. Paragraph 159 of the NPPF recognises that the objective assessment of housing need must be one that meets household and population projections, taking account of migration and demographic change; meets the need for all types of housing, including affordable, and caters for housing demand and the scale of housing supply necessary to meet that demand. The PPG recognises that establishing future need for housing is not an exact science (para 014 2a-014-29140306), although it should be informed by reasonable and proportionate evidence.

6.31 In order to establish OAHN, PPG recommends a logical progression of steps, as follows:

- Establishing the Housing Market Area;
- Making use of DCLG household projections as the starting point estimating the OAHN;
- Considering sensitivity testing specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates;
- Taking account of employment trends;
- Taking account of market signals;
- Considering an increase in the total housing figures where it could help deliver the total number of affordable homes.

6.32 The figure below demonstrates the process to be followed when calculating OAHN based on the guidance set out within the NPPF and the PPG.

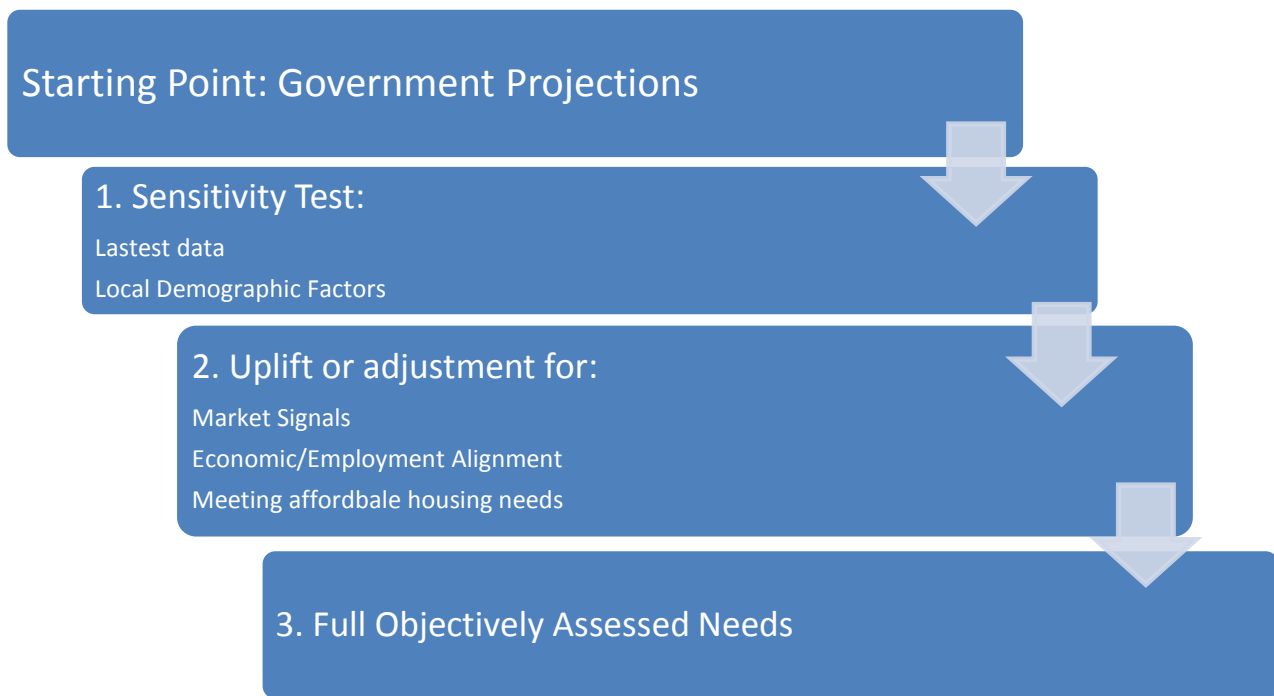


Figure 3 Calculating OAN

- 6.33 In order to calculate the OAHN for Sunderland, the Council prepared a Strategic Housing Market Assessment (SHMA) (SP.10)⁴⁵, which amongst other things would calculate the OAHN, taking into account detailed demographic modelling work which had been undertaken by Edge Analytics (Sunderland Demographic Analysis & Forecasts: December 2015 (SP.11)⁴⁶ and Sunderland Updating the Demographic Evidence: October 2016) (SD.21)⁴⁷.
- 6.34 Since the Plan was rebased in 2015, several iterations of the SHMA (SD.23, SD.24)⁴⁸ have been published to update the Council's OAHN based on the latest available evidence and to take account of representations made in response to the various rounds of consultation on the emerging Plan. The following sections of the compliance paper provide a narrative of this process and how the OAHN has changed during the course of the preparation of the Plan. This section of the Statement reviews the evolution of the calculation of the OAHN.

Sunderland Housing Market

- 6.35 The first requirement when establishing to identify the OAHN is to identify the most appropriate Housing Market Area. The OAHN should then be calculated for the Housing Market Area as a whole.

⁴⁵[https://www.sunderland.gov.uk/media/20914/SP-10-Sunderland-Objectively-Assessed-Need-and-Strategic-Housing-Market-Assessment-Update-2016-91770000.pdf/SP.10_Sunderland_Objectively_Assessed_Need_and_Strategic_Housing_Market_Assessment_Update_\(2016\).pdf?m=636803122291770000](https://www.sunderland.gov.uk/media/20914/SP-10-Sunderland-Objectively-Assessed-Need-and-Strategic-Housing-Market-Assessment-Update-2016-91770000.pdf/SP.10_Sunderland_Objectively_Assessed_Need_and_Strategic_Housing_Market_Assessment_Update_(2016).pdf?m=636803122291770000)

⁴⁶[https://www.sunderland.gov.uk/media/20915/SP-11-Sunderland-Demographic-Analysis-and-Forecasts-2015-91770000.pdf/SP.11_Sunderland_Demographic_Analysis_and_Forecasts_\(2015\).pdf?m=636803122749930000](https://www.sunderland.gov.uk/media/20915/SP-11-Sunderland-Demographic-Analysis-and-Forecasts-2015-91770000.pdf/SP.11_Sunderland_Demographic_Analysis_and_Forecasts_(2015).pdf?m=636803122749930000)

⁴⁷[https://www.sunderland.gov.uk/media/20859/SD-21-Sunderland-Updating-the-Demographic-Evidence-2016-91770000.pdf/SD.21_Sunderland_Updating_the_Demographic_Evidence_\(2016\).pdf?m=636802945060500000](https://www.sunderland.gov.uk/media/20859/SD-21-Sunderland-Updating-the-Demographic-Evidence-2016-91770000.pdf/SD.21_Sunderland_Updating_the_Demographic_Evidence_(2016).pdf?m=636802945060500000)

⁴⁸[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-91770000.pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-91770000.pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)
[https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-91770000.pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-91770000.pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

- 6.36 The SHMA (SP.10) (2016; Chapter 3; pg 33-47) reviewed a range of data including house price, migration and travel to work data, which provided evidence that Sunderland exhibits a high degree of self-containment in terms migration (the 2011 Census indicated that 76.2% of movers originated in Sunderland). In addition, the 2012 Household Survey (rebased to 2015) which informed the SHMA, also identified that 84.4% of those who had moved within the preceding 5 years originated in Sunderland and that 80.6% of households planning to move in the next five years intend to remain within Sunderland.
- 6.37 It was concluded that Sunderland is an appropriate Housing Market Area for the purposes of Local Plan policy making.

Calculating the OAN for Growth Options 2016 – Step 1 Sensitivity Testing

- 6.38 The PPG requires that local planning authorities to use the latest DCLG household projections as the 'starting point' in the assessment of housing need. At that point in time, the 2012-based population and household projections were the latest available and were therefore utilised as the starting point for the demographic analysis. The 2012 based projections indicated that the population of Sunderland was expected to increase by 4,710 people over the period from 2017-2037, representing an increase in population of 1.7%.
- 6.39 At that point in time, the Plan period was considered to be 2015-2035 and the household projections suggested an increase of 9,063 households, or approximately 45 households per year and an annual increase of 467 dwellings (Sunderland Demographic Analysis & Forecasts 2015: (SP.11) Table 8; pg 22).

Calculating the OAN for Growth Options 2016 – Step 2 Uplift or Adjustment

- 6.40 After establishing the starting point for the calculation of the OAHN, the PPG then recommends considering adjustments to the starting point to take account of local demographic trends, future jobs, past delivery, market signals and other local circumstances which may not have been captured by past trends. Each of these was considered in turn when identifying the OAHN for Sunderland.

Local Demographic Trends

- 6.41 The 2012-based Subnational Population Projections were based on projection data using demographic assumptions over a five-year historical period to 2012. However, in order to understand whether this was likely to be an accurate reflection of demographic projections moving forward, a range of alternative demographic scenarios were modelled (see Sunderland Demographic Analysis & Forecasts 2015: (SP.11) Table 8; pg 22). This included a 5 year trend using the more up to date 2014 mid-year population estimates and a longer term trend by modelling 10 years of data. In addition, at the request of the Council, three sensitivity scenarios were modelled as follows:
- **SNPP 2012 SENS 20-29** – this sensitivity was based on the 2012 Subnational Population Projections scenario, but with adjustments made to reduce the annual 'loss' of internal out-migrants aged 20-29 during the period 2015-2035 (as shown in Table 1 below);
 - **SNPP-2012 SENS 25-29** - this sensitivity was based on the 2012 Subnational Population Projections scenario, but with adjustments made to reduce the annual 'loss' of internal out-migrants aged 25-29 during the period 2015-2035 (as shown in Table 1 below).
 - **PG-10yr SENS:** internal migration rates and international migration flow assumptions were based on the last 10 years of historical evidence (2004/05-2013/14), with net internal out-migration reduced by 105 in each year of the forecast

Table 1 Proportion of internal out-migrants 'retained' in the SNPP-2012 sensitivities

Year of Plan period	1-5	6-10	11-15	26-20
	2015-2020	2021-2025	2026-2030	2031-2035
Proportion of internal out-migrants retained	25%	35%	50%	60%

6.42 The above demographic scenarios resulted in the following outputs:

Table 2 Sunderland Demographic scenario outcomes (2015-2035)

Scenario	Change 2015 - 2035				Average per year	
	Population Change	Population Change %	Household Change	Households Change %	Net Migration	Dwellings
SNPP-2012 SENS 20-29	45,863	16.6%	32,833	27.0%	2,175	1,691
SNPP-2012 SENS 25-29	33,977	12.3%	27,520	22.6%	1,580	1,417
PG-5Yr	7,119	2.6%	9,778	8.0%	142	504
PG-10yr SENS	5,040	1.8%	9,609	7.9%	76	495
SNPP-2012	4,216	1.5%	9,063	7.5%	92	467
PG-10yr	2,560	0.9%	8,586	7.1%	-29	442
Natural Change	811	0.3%	9,457	7.7%	0	487

Market Signals

6.43 The SHMA (SP.10)(2016; Para8.13; pg 120) considered a range of market signal evidence focusing on price and quantity indicators, with comparisons to 'comparator districts' in the North East and England. The review of this analysis concluded that no further uplifts to the starting point were necessary as a result of the market signals data.

Past Completions

6.44 Past completions over the period from 1998/1999 to 2014/2015 demonstrated that there was a total of 11,794 dwellings completed during this period (see SHMA (SP.10) 2016; Para 8.14; pg 121). However, due to significant levels of stock losses also taking place during this period, primarily as a result of the regeneration and renewal programme of Gentoo, the number of net additional homes provided over this period was 5,534 or an average of 324 net additional homes per annum.

6.45 However, the SHMA (2016 Para 8.15; pg 121) (SP.10); concluded that any dwelling backlog that is already accounted for as part of the OAHN calculation and there was therefore no need to further update the OAHN to account for this. This was based on the basis of a High Court decision (Zurich Assurance v Winchester City Council and South Downs National Park Authority 18 March 2014), where the judgement stated that it would be highly contrived to add backlog onto any OAHN as this would 'mix apples and oranges in an unjustified way'. In addition, the market signals did not suggest a suppressed housing

market with house prices remaining relatively static, median house price rentals falling and with house prices remaining consistently lower than both the regional and national averages.

Jobs Growth

6.46 Consideration of the alignment of housing growth with economic growth is a key requirement of the PPG. In order to consider this, Edge Analytics ran a number of scenarios which sought to align likely levels of economic growth within Sunderland with housing growth. In order to assess the likely number of jobs which could be supported under the demographic scenarios, Edge Analytics modelled this using POPGROUP software. To model these scenarios, the following base assumptions were used:

- **Economic Activity Rates** for Sunderland from the 2011 Census, by sex and 5-year age-group (ages 16-74), have been applied in 2011, with adjustments applied, to 2020, to account for changes to the State Pension Age (SPA). After 2020, the rates are fixed.
- The 2014 **unemployment rate** for Sunderland (9%), has been applied, reducing to a pre-recession (2004-2007) average of 6.5% by 2020 and remaining fixed thereafter. These unemployment rates have been sourced from the ONS model-based estimates of unemployment for Sunderland.
- A fixed **commuting rate** of 0.96, from the 2011 Census Travel to Work data for Sunderland, has been applied in each year of the forecast period.

6.47 Taking into account the above, none of the demographic scenarios modelled would support economic growth, excluding the very ambitious scenarios which sought to retain greater proportions of the working age population. The outputs of the modelling were as follows:

Table 3 Sunderland labour force and jobs change (2015-2035)

Scenario	Change (2015-2035)			Average Annual Jobs Growth (2015-2035)
	Labour Force (16-74)	Employed People	Unemployed People	
SNPP-2012	-10,336	-6,878	-3,457	-357
PG-5yr	-9,548	-6,126	-3,422	-318
PG-10yr	-11,372	-7,834	-3,538	-407
Natural Change	-12,734	-9,103	-3,632	-473
SNPP-2012 SENS 20-29	22,582	23,900	-1,318	1,241
SNPP-2012 SENS 25-29	12,819	14,772	-1,952	767
PG-10yr SENS	-10,050	-6,596	-3,453	-342

6.48 To determine the likely levels of economic growth anticipated within the city, the Council obtained the May 2015 Experian jobs growth forecast for the city, which projected that there would be a total of total jobs growth of 11,021 within the city over the period from 2015 to 2035. In order to calculate the likely level of housing growth that would be required in Sunderland to support the anticipated level of economic growth, Edge Analytics utilised POPGROUP software again (see Sunderland Demographic Analysis & Forecasts 2015: (SP.11) Chapter 6; pg 24-36) .

6.49 In order to fully consider the alignment between economic and housing growth, a number of sensitivity analyses were modelled which included adjustments to the core assumptions over economic activity rates and commuting rates. The assumptions used in the alternative scenarios are set out within Table 4.

Table 4 Economic assumptions used in the Jobs-led Experian scenario and sensitivities

		Jobs-led Experian sensitivities											
		Jobs-led Experian	SENS A	SENS B	SENS C	SENS D	SENS E	SENS F	SENS G	SENS H	SENS I	SENS J	SENS K
Economic Activity	2011 Census economic activity rates by sex and 5-year-age-group (ages 16-74), with SPA uplifts applied to males and females aged 60-69 to 2020, then fixed	/				/				/			
	2011 Census economic activity rates by sex for the aggregate 16-74 age-group, fixed		/				/				/		
	2011 Census economic activity rates by sex and 5-year age-group (ages 16-74), with OBR adjustments applied to males aged 60-74 to 2031, then fixed			/				/				/	
	2011 Census economic activity rates by sex and 5-year age-group (ages 16-74), with OBR adjustments applied to males aged 60-74 and females aged 30-74 to 2031, then fixed				/				/				/
Unemployment	ONS (2014) unemployment rate for Sunderland (9%) applied, reducing to a pre-recession (2004-2007) average of 6.5% by 2020 and fixed thereafter	/	/	/	/	/	/	/	/	/	/	/	/
Commuting	2011 Census commuting ratio for Sunderland (0.96) fixed	/	/	/	/								
	2011 Census commuting ratio for Sunderland (0.96) reducing to 0.94 between 2014-2021, then fixed					/	/	/	/				
	2011 Census commuting ratio for Sunderland (0.96) reducing to 0.92 between 2014-2015									/	/	/	/

6.50 The outputs of the demographic modelling work showed that there was significant variances between each of the scenarios, depending on the assumptions used, however it was clear that in order to achieve an alignment between the forecast levels of jobs growth and housing growth, there would need to be a substantial increase in the housing requirement, as shown in Table 5 below.

Table 5 Jobs-led Experian sensitivity outcomes

Scenario ⁴⁹	Change 2015 - 2035				Average per year		
	Population change	Population change %	Households change	Households change %	Net migration	Dwellings	Jobs
Jobs-led Experian	39,160	14.1%	23,527	19.2%	1,557	1,212	551
Jobs-led Experian SENS B	34,429	12.4%	21,574	17.7%	1,357	1,111	551
Jobs-led Experian SENS A	34,047	12.3%	21,352	17.5%	1,362	1,100	551
Jobs-led Experian SENS D	33,281	12.0%	21,031	17.2%	1,333	1,083	551
Jobs-led Experian SENS C	31,298	11.3%	20,271	16.6%	1,228	1,044	551
Jobs-led Experian SENS F	28,604	10.3%	19,099	15.7%	1,135	984	551
Jobs-led Experian SENS H	27,841	10.0%	18,873	15.5%	1,074	972	551
Jobs-led Experian SENS E	27,693	10.0%	18,641	15.3%	1,123	960	551
Jobs-led Experian SENS G	25,566	9.2%	17,833	14.6%	1,010	919	551
Jobs-led Experian SENS J	23,179	8.3%	16,946	13.9%	877	873	551
Jobs-led Experian SENS I	21,289	7.7%	16,098	13.2%	819	829	551
Jobs-led Experian SENS K	20,186	7.3%	15,698	12.9%	754	809	551

6.51 Taking account of the modelling work and the need to support economic growth within the city, the SHMA (SD.10) (2016; Paras 8.16-8.20 pg 121-122) identified that an uplift to the

⁴⁹ Note that scenarios are listed in order of the average annual dwelling growth requirement

starting point figure was required to support economic growth within the city. However, the uplift applied, also needed to be realistic and achievable. Taking this into consideration, the SHMA (SP.10) (2016; Para 8.18 pg 121-122) identified that the Jobs-led Experian SENSKE scenario would represent the most likely scenario on which to base the OAHN.

- 6.52 In addition to the uplift applied to for economic growth to align to the Experian jobs growth forecast, in order to support the evidence base for the International Advanced Manufacturing Park (IAMP), a separate piece of work was undertaken jointly with South Tyneside Council to consider the potential housing impacts resulting from the IAMP. As the Experian jobs growth forecast was predicated on past trends and did not forecast any jobs growth within the IAMP related sectors, it was considered prudent to consider the growth associated with the proposed IAMP separately, as this would be additional growth which had not been taken into consideration as part of the Experian forecast. Indeed, the Experian jobs growth forecast from May 2015 actually identified a contraction in the two employment sectors most closely aligned to those anticipated on the IAMP (Machinery & Equipment and Transport Equipment sectors). On this basis, it was therefore considered that the IAMP should be treated as additional growth which hadn't already been accounted for.
- 6.53 As the IAMP was considered to be an employment site of national and regional importance, with good accessibility to the strategic road network, it was recognised that workers on the IAMP would likely to be drawn from a much larger area than most employment sites. This is similar to the existing Nissan plant and its supply chain which draw their workforces from a considerable distance and reinforced by home postcode data gathered from two Tier 1 Nissan suppliers which was used to inform the IAMP Housing Impact Paper (September 2015) (SP.12)⁵⁰.
- 6.54 It was also recognised that the vast majority of the proposed jobs at the IAMP would likely be taken by existing residents within the North East who are already housed within the area, therefore it was only necessary to identify the housing needs of those residents who would be drawn from outside the region to work at the IAMP.
- 6.55 The IAMP Housing Impact Paper (September 2015 pg. 8) (SP.12) modelled a number of different scenarios ranging from 50% of the workforce being drawn from outside of the region to 5%, however based on an analysis of similar employment parks throughout the UK it was determined that 5-10% (or Scenarios C and D), would be the most likely. After arriving at the number of employees who would need to be housed, the paper assumed that one dwelling per worker would be required to meet their housing needs and that the locations in which they are likely to live, is based on the types of jobs that they would undertake. Using the SOC data of the likely jobs to be created on IAMP and then comparing this to the postcode data from the Tier 1 suppliers, a broad housing distribution for the IAMP was arrived at as set out in Table 6 below.

Table 6 Overall Housing Requirements from IAMP impacts

Local Authority	Total	Scenario			
		A	B	C	D
County Durham	1,577	789	394	158	79

⁵⁰ [https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_\(2015\).pdf?m=636807531803700000](https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_(2015).pdf?m=636807531803700000)

Darlington	53	27	13	5	3
Gateshead	467	234	117	47	23
Hartlepool	104	52	26	10	5
Middlesbrough	15	8	4	2	1
Newcastle upon Tyne	159	80	40	16	8
North Tyneside	252	126	63	25	13
Northumberland	251	126	63	25	13
Redcar & Cleveland	23	12	6	2	1
South Tyneside	502	251	126	50	25
Stockton on Tees	60	30	15	6	3
Sunderland	1,765	883	441	177	88
Total	5,228	2,618	1,308	523	262

6.56 For the purposes of calculating the OAHN, it was assumed that Scenario C would be the most likely uplift to the starting point figure.

Affordable Housing Need

6.57 The SHMA (SP.10) (2016; Paras 6.107-6.110; pg 101) identified an annual imbalance of 615 affordable dwellings each year over the next five years. However, the SHMA (SP.10) (2016) also recognised that this was not an identification of affordable housing need, but instead simply sought to identify the imbalance between supply and demand. The delivery of affordable housing will be met through a number of delivery mechanisms including as part of new housing sites and through Homes England funding. In addition, in reality households may pay more for their housing than the modelling assumes (25% for rental and 3.5x income for owner occupation) and newly forming households may share accommodation until they can afford to buy. On this basis, the SHMA (SP.10) (2016; Para 8.21; pg 122) did not identify any need to uplift the OAHN for affordable housing need.

Calculating the OAN for Growth Options 2016 – Step 3 OAN

6.58 Taking into account the factors identified above, the SHMA (SP.10) (2016; Para 8.25 pg 123) indicated that the OAHN for Sunderland was 819 net additional dwellings per annum. This was arrived at by using the Subnational population and household projections (2012 based) as the starting point, which identified an annual requirement for 467 net additional dwellings per annum. An uplift to this starting point was applied to take account of short term migration trends which had been more positive than those accounted for within the subnational projections which were based on slightly older data. This increased the requirement to 504 net additional dwellings per annum.

6.59 In order to try and align the housing growth with economic growth, a number of scenarios were modelled using POPGROUP software. This demonstrated that all of the demographic scenarios would not facilitate economic growth within Sunderland, due to the shrinking size of the working age population. Edge Analytics therefore run a number of economic-led scenarios to determine the levels of housing growth that would be required to facilitate the levels of economic growth predicted through the Experian jobs growth forecast (May 2015; Table 13; pg 36) (SP.11). This indicated that depending on the economic activity rate and commuting assumptions used, a housing requirement of between 809 and 1,212 net additional dwellings would be required to support the levels of economic growth forecast. It was considered that Jobs-led Experian SENSK would provide the most reasonable and realistic scenario and therefore this was used at the basis for an uplift of the OAHN to support economic growth. This raised the starting point to 809 net additional dwellings per annum.

- 6.60 Finally, in order to identify the likely housing impacts of the IAMP, the IAMP Housing Impact Paper (September 2015) (SP.12) was prepared. As it was not considered that the growth anticipated on the IAMP had been captured in the past trends used to inform the Experian jobs growth forecast (May 2015) (SP.11), this was considered to be additional growth which would need to be factored in on top of the economic uplift. The SHMA (2016; Para 8.26; pg 123) (SP.10) therefore recommended a further uplift of the starting point of 10 dwellings per annum, resulting in an OAHN for Sunderland of 819 net additional dwellings per annum. The SHMA (2016) (SP.10) was used to inform the consultation on the Core Strategy Growth Options which took place in Spring 2016. This OAHN figure of 819 net additional dwellings per annum was presented as the medium growth scenario within the Growth Options consultation document.
- 6.61 A number of representations were received in response to the Growth Options consultation, which made specific reference to the OAHN and the assumptions that underpinned this. Durham County Council, Newcastle City Council and Gateshead Council all expressed concerns regarding the implications that the medium and high growth scenarios could have upon their respective Local Plans (see Core Strategy Growth Options Consultation Responses Report July 2016: Section 5) (SP.2)⁵¹.
- 6.62 Firstly, concerns were raised regarding the Council not using a fixed commuting rate in their calculation of the OAHN. There was concern that this would then be incompatible with the assumptions used by other neighbouring authorities, all of whom had used a fixed commuting rate when calculating their respective OAHN's.
- 6.63 Secondly, there were concerns raised regarding the potential impacts that the medium and high growth scenarios would have upon the migration rates between Sunderland and other authorities. Newcastle and Gateshead Councils had recently adopted their joint Core Strategy and Urban Core Plan, the housing numbers within which were predicated on demographic projections available at the time. Therefore, they are planning for a continuation of existing trends. Similarly, Durham were seeking to adopt a demographic-led approach which was based on a continuation of past trends. Concern was therefore expressed that by planning for higher levels of growth, Sunderland were seeking to adjust migration patterns and effectively neighbouring authorities could be planning to meet the same growth.
- 6.64 Finally, Gateshead Council highlighted some concerns over the approach adopted within the IAMP Housing Impact Paper (SP.12)⁵². Firstly, they highlighted that the full net additional jobs which were anticipated as a result of the IAMP had not been taken into consideration in the Impact Paper (SP.12). In addition, they also questioned the approach to the Impact Paper (SP.12), as it only sought to model the housing impact of the proportion of the workforce that would be drawn from outside of the North East region. It was considered that as there would be a need to 'back fill' jobs that existing workers had vacated to take up employment on the IAMP, the impacts of this should be taken into account as part of the IAMP Housing Impact Paper (SP.12). In addition to the comments raised by neighbouring authorities, concerns were expressed by some representations that the economic forecasts used within the demographic modelling work were too optimistic and

⁵¹ [https://www.sunderland.gov.uk/media/20906/SP-2-Core-Strategy-Growth-Options-Consultation-Responses-Perort-2016-/pdf/SP.2_Core_Strategy_Growth_Options_Consultation_Responses_Report_\(2016\).pdf?m=636803118435070000](https://www.sunderland.gov.uk/media/20906/SP-2-Core-Strategy-Growth-Options-Consultation-Responses-Perort-2016-/pdf/SP.2_Core_Strategy_Growth_Options_Consultation_Responses_Report_(2016).pdf?m=636803118435070000)

⁵² [https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_\(2015\).pdf?m=636807531803700000](https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_(2015).pdf?m=636807531803700000)

that in particular, they had not taken into consideration the likely impacts of the EU Referendum which took place in June 2016.

Calculating the OAN for Draft Plan – Step 1 Sensitivity Testing

6.65 Following the publication of the SHMA (SP.10) in March 2016 and consultation on the Growth Options (SP.2) in Spring 2016, the Office for National Statistics (ONS) published its 2014-based subnational population projections. Subsequently, the Government published its 2014-based household projections utilising the data from the ONS. The PPG indicates that in order to calculate the OAHN, the starting point should be the latest published population and household projections, therefore in order to meet the requirements of Government guidance, the Council updated its demographic modelling based on the 2014-based projections (see Sunderland: Updating the Demographic Evidence Report October 2016) (SD.21). This additional modelling work was used to inform the OAHN calculation within the SHMA Update (May 2017) (SD.23).

6.66 When undertaking the additional modelling work, the Council also considered that it would be prudent to utilise a post-EU referendum economic forecast, to address concerns raised during the Growth Options consultation that the economic forecasts were overly optimistic. The September 2016 Experian jobs forecast for Sunderland was therefore used within the updated modelling work. This predicted a significantly lower level of economic growth within the city, from in excess of 15,000 net additional workforce jobs in the previous forecasts to 7,200 jobs within the September 2016 forecast (see Employment Land Review: Post EU Referendum Forecasting Analysis, 2017; pg 4-5) (SD.38)⁵³. In addition, in order to understand the potential implications of following a demographic-led approach with reductions to the levels of net internal out-migration (i.e. out migration to other authority areas within the UK), the Council also modelled two additional scenarios as follows:

- **SNPP-2014 SENS Zero Mig:** the inflow and outflow of internal migrants results in a net migration balance of zero, for all years of the forecast period.
- **SNPP-2014 SENS Reducing Mig:** this scenario also seeks to achieve zero net internal migration but does so through a gradual change in the net balance over the course of the forecast period.

6.67 The outputs of analysis were presented within in the 'Updating the Demographic Evidence' report (SD.21) which was published in October 2016. Under the revised modelling, the subnational population projections showed a notably higher level of population growth was anticipated within Sunderland over the forecast period, with population growth of 8,560 forecast by 2033, compared to the population growth of 4,216 projected by the 2012 based subnational population projections. The outputs of the demographic scenarios from the 2014 based subnational population projections are shown in Table 7 below.

Table 7 Sunderland demographic scenario outcomes 2015-2033

Scenario	Change 2015-2033				Average per year	
	Population change	Population change %	Households change	Households change %	Net Migration	Dwellings
SNPP-2014 SENS Zero Mig	21,594	7.8%	16,540	13.6%	982	947
SNPP-	14,354	5.2%	12,958	10.6%	652	742

⁵³

[https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_\(2017\).pdf?m=636802955887300000](https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_(2017).pdf?m=636802955887300000)

2014 SENS Reducing Mig						
SNPP-2014	8,560	3.1%	9,965	8.2%	360	570
PG-5Yr	7,544	2.7%	9,325	7.7%	318	534
SNPP-2012	4,043	1.5%	8,454	7.0%	72	484
PG-10-10yr SENS CD Mig	3,674	1.3%	8,631	7.1%	147	494
PG-10yr	1,675	0.6%	7,829	6.4%	51	448
Natural Change	-898	-0.3%	8,887	7.3%	0	509

6.68 In developing OAHN's in other areas, it is often cited that Headship rates have been suppressed as a result of the recession (i.e. that young adults who would have normally formed new households have been restricted in doing so). In order to determine the impact on housing numbers of a return of headship rates to pre-recession levels, the Council modelled a number of scenarios using Headship rates from the 2008, 2012 and 2014 population projections and also a scenario which would gradually return Headship rates to 2008 levels by the end of the forecast period. Table 8 below identifies the outputs of the varying demographic scenarios using the different Headship rates:

Table 8 Sunderland demographic scenario dwelling growth outcomes using variant headship rates

Scenario Name	Average Dwellings per year (2015-2033)			
	HH-08	HH-12	HH-14	HH-14-Return
SNPP-2014 SENS Zero Mig	996	944	947	987
SNPP-2014 SENS Reducing Mig	794	738	742	782
SNPP-2014 PG-5yr	620	566	570	608
Natural Change	543	504	509	540
PG-10yr SENS CD Mig	537	489	494	529
SNPP-2012	528	479	484	519
PG-10yr	491	443	448	483

6.69 Despite the notable increase in the levels of population growth anticipated within Sunderland over the plan period between the 2012 and the 2014 subnational population projections, table 8 shows that this would still not provide a sufficient sized working age population to support economic growth within the city. The only demographic scenarios that would support economic growth are the policy-on scenarios which seek to reduce the levels of net internal outmigration. In order to understand the levels of household growth which would be required to support the levels of economic growth set out within the September 2016 Experian economic forecasts, the demographic modelling again utilised POPGROUP software. Similar to the previous modelling work, a number of alternative scenarios were modelled, as follows:

Table 9 Economic assumptions used in the Jobs-led Experian scenarios and sensitivities

		Jobs-led Experian	SENS A	SENS B	SENS C	SENS D	SENS E	SENS F	SENS G	SENS H
Economic Activity	2011 Census economic activity rates by sex and 5-year-age-group (ages 16-75+), with OBR adjustments to males and females aged 60-75+ to 2033.	/			/			/		
	2011 Census economic activity rates by sex and 5-year-age-group (ages 16-75+), with OBR adjustments to males and females aged 60-75+ and females aged 30-75+ to 2033.		/			/			/	
	2011 Census economic activity rates by sex for the aggregate 16-75+ age-group, maintained throughout the plan period.			/			/			/
Unemployment	ILO (International Labour Organisation) unemployment rate from the Experian assumptions	/	/	/	/	/	/	/	/	/
Commuting	2011 Census commuting ratio for Sunderland (0.96) fixed	/	/	/						
	2011 Census commuting ratio for Sunderland (0.96) reducing to 0.94 between 2015-2020, then fixed				/	/	/			
	2011 Census commuting ratio for Sunderland (0.96) reducing to 0.92 between 2015-2033							/	/	/

Table 10 Jobs-led Experian sensitivity outcomes

Scenario	Change 2015-2033				Average per year		
	Population change	Population change %	Households change	Households change %	Net Migration	Dwellings	Jobs
Jobs-led Experian	19,436	7.0%	14,184	11.6%	904	812	317
Jobs-led Experian SENS A	16,516	6.0%	13,017	10.7%	763	745	317
Jobs-led Experian SENS B	3,377	1.2%	7,718	6.3%	131	442	317

Jobs-led Experian SENS C	13,079	4.7%	11,533	9.5%	619	660	317
Jobs-led Experian SENS D	10,244	3.7%	10,400	8.5%	481	595	317
Jobs-led Experian SENS E	-3,999	-1.4%	4,620	3.8%	-198	264	317
Jobs-led Experian SENS F	3,797	1.4%	7,950	6.5%	142	455	317
Jobs-led Experian SENS G	1,047	0.4%	6,848	5.6%	9	392	317
Jobs-led Experian SENS H	-15,394	-5.6%	209	0.2%	-784	12	317

6.70 Table 10 demonstrates that as a result of the higher starting point figure, due to the more positive 2014-based subnational population projections and the significantly reduced economic forecasts, the alignment between the housing and economic growth forecasts is much closer than in the previous modelling work, however, the modelling does still indicate that without changes to the commuting rate, the Council would need to rely upon additional in-commuting to support economic growth. In order to calculate the revised OAHN, the SHMA Update 2017 (SD.23) (Chapter 6) took into consideration the updated demographic evidence and also responses received on the Growth Options consultation regarding the OAHN.

6.71 In accordance with the PPG, the latest published population and household projections were used as the starting point for the calculation of the OAHN. In this instance, these were the 2014-based subnational projections which indicated an annual housing need for 570 net additional dwellings per annum (see Sunderland: Updating the Demographic Evidence 2016; Para 4.16; pg 22) (SD.21).

6.72 When considering demographic trends, the modelling on this occasion showed the subnational population projections indicated the highest dwelling requirement, with both the 5 year and 10 trend based adjustments being lower. It was therefore determined that there should be no adjustment to take account of local demographic factors. In considering Headship rates, PAS guidance⁵⁴ recommends that when starting on a new housing assessment or updating an earlier one, plan-makers should set aside headship rates that pre-date CLG 2012 (which were the latest available projections when the guidance was

⁵⁴ Objectively Assessed Need and Housing Targets: Technical Advice Note, Second Edition (July 2015).

published). It is therefore implied that the latest headship rates are used as a basis for calculating OAHN. This is reinforced by the following factors:

- Median house prices within Sunderland have remained relatively flat despite;
- Nationally the percentage of younger home owners is decreasing, suggesting a continuation of this trend;
- The number of first time house buyers has been generally declining since the early 2000s;
- Increased deposits are generally required to buy a first home as a result of restrictions by mortgage lenders; and
- The number of young adults aged 20-24 living with their parents has increased from 1 in 5 in 2008 to 1 in 4 in 2014.

- 6.73 A wider consideration of market signals was also undertaken which did not justify an uplift to the housing requirement. However, as identified earlier, despite the positive increase in the 2014-based population projections when compared to the 2012-based version, the levels of population growth projected were still unable to support economic growth within the city (see Sunderland: Updating the Demographic Evidence 2016; Table 9; pg 27) (SD.21).
- 6.74 Consideration was therefore given to the levels of population growth that would be required to meet the employment numbers anticipated within the September 2016 Experian jobs growth forecast. It should be noted that the modelling utilised the workplace based jobs growth of 5,700 over the plan period. Whilst it is recognised that this is lower than the 7,200 workforce jobs figure, the model uses work-place based employment, as it is a people measure of employment, whilst the headcount and FTE figures are a jobs count measure, in which more than one person might occupy more than one job. Therefore, the 'Employment-led' scenarios developed in POPGROUP use the annual change in workplace-based employment, as it aligns with the people measure of employment growth in the demographic modelling.
- 6.75 A number of variant scenarios were modelled (as set out within Table 10 of the Sunderland: Updating the Demographic Evidence 2016; Table 10, pg 33) (SD.21)⁵⁵. It was considered that Experian Jobs-led SENS A would provide the most realistic scenario, as this was based on a fixed-commuting rate which would ensure consistency with the methodology being used by other neighbouring authorities. This scenario also fully takes into account the OBR adjustments to economic activity rates. The SHMA Update (2017; Para 8.9; pg 127) (SD.23) therefore indicated that an upward adjustment of the starting point to 768 net additional dwellings was required to support economic growth, including the IAMP. As the Experian jobs forecasts are based on past trends, at that time it was considered that these would not include the jobs growth associated within the International Advanced Manufacturing Park. A separate study was therefore undertaken to identify the likely housing impacts of the IAMP.
- 6.76 In order to take account of the representations made by neighbouring authorities on the original IAMP Housing Impact Paper (2015) (SP.12), an amended version was published in October 2016. This sought to identify the full net job benefits of the IAMP, once displacement and multiplier effects had been taken into account. As the multiplier benefits

⁵⁵ [https://www.sunderland.gov.uk/media/20859/SD-21-Sunderland-Updating-the-Demographic-Evidence-2016-/pdf/SD.21_Sunderland_Updating_the_Demographic_Evidence_\(2016\).pdf?m=636802945060500000](https://www.sunderland.gov.uk/media/20859/SD-21-Sunderland-Updating-the-Demographic-Evidence-2016-/pdf/SD.21_Sunderland_Updating_the_Demographic_Evidence_(2016).pdf?m=636802945060500000)

were considered to outweigh the displacement effects of the scheme, it was considered that the IAMP would result in a total of 11,230 net additional jobs.

- 6.77 The IAMP Housing Impact Paper (October 2016) (SP.12)⁵⁶, identified that the impacts would be distributed as follows, based on the same scenarios as those used within the initial Impact Paper.

Table 11 Overall housing requirement resulting from the IAMP

Local Authority	Total	Scenario			
		A	B	C	D
County Durham	2,909	1,455	727	291	145
Darlington	93	47	23	9	5
Gateshead	1,092	546	273	109	55
Hartlepool	285	143	71	29	14
Middlesbrough	45	22	11	4	2
Newcastle upon Tyne	431	215	108	43	22
North Tyneside	502	251	125	50	25
Northumberland	382	191	96	38	19
Redcar & Cleveland	40	20	10	4	2
South Tyneside	1,222	611	305	122	61
Stockton on Tees	127	64	32	13	6
Sunderland	4,101	2,050	1,025	410	205
Total	11,230	2,618	2,808	1,123	562

Calculating the OAN for Draft Plan 2017 – Step 3 OAN

- 6.78 Consistent with the previous OAHN calculation, it was considered that Scenario C, which assumes that 10% of the IAMP workforce would move to the region to work on the IAMP was the most realistic taking into consideration case studies of other similar advanced manufacturing parks elsewhere within the UK (see IAMP Housing Impact Paper October 2016; pg 7-8) (SP.12). On this basis, a further uplift of 23 net additional dwellings was included as part of the economic uplift, bringing the OAHN to 768 net additional dwellings per annum (See SHMA Update 2017; Para 8.9 pg 127) (SD.23). This OAHN figure of 768 net additional dwellings per annum was taken forward as the housing requirement within the draft Plan, which was published for consultation between August and October 2017.

Calculating the OAN for Publication Draft 2018

- 6.79 Following the consultation on the draft CSDP and the representations received as a result, the Council decided to re-evaluate the calculation of its OAHN to ensure that it was robust. As set out earlier, without making an upward adjustment to the demographic baseline projections the Council would not be able to support economic growth within the city, as the size of the resident workforce is forecast to reduce by 3,383 people over the plan period (see Sunderland Updating the Demographic Evidence – Table 9: pg 27) (SD.21). The only way that economic growth could be supported within the city would be to rely upon significant levels of additional in-commuting from other areas, which is not considered to be a sustainable option. Furthermore, this would also make the Council's strategy inconsistent with that of neighbouring authorities who highlighted concerns over the Council not using a fixed commuting rate during the Growth Options consultation.

⁵⁶ [https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_\(2015\).pdf?m=636807531803700000](https://www.sunderland.gov.uk/media/20998/SP-12-Impact-Study-International-Advanced-Manufacturing-Park-Topic-Paper-Housing-2015-/pdf/SP.12_Impact_Study_-_International_Advanced_Manufacturing_Park_-_Topic_Paper_-_Housing_(2015).pdf?m=636807531803700000)

- 6.80 The post EU Referendum Experian-jobs forecast (September 2016) (SD.38)⁵⁷ which has been used for the modelling work is considered to represent a realistic level of jobs growth for the city over the plan period. The forecast represents a workforce jobs growth of 7,200 over the plan period (2015-2033), which would be slightly lower than the level of jobs growth experienced over the previous 18yr period (1997-2015), when 9,630 jobs were created (see Employment Land Review (2016), para 3.12, pg 14) (SD.37)⁵⁸.
- 6.81 However, when the growth sectors within the Experian forecast were considered in more detail, it was recognised that 3,400 of the predicted jobs growth is anticipated to be within the Transport Equipment and Machinery & Equipment sectors, which are those most likely to take place on the IAMP. The Council was therefore concerned that adding a further additional jobs growth uplift onto the OAHN calculation for the IAMP, as had been done as part of the OAHN calculation for the SHMA Update (2017) (SD.23)⁵⁹, would likely result in double-counting of jobs growth within the city. Furthermore, this would represent the vast majority of the IAMP jobs that would be anticipated to take place within Sunderland, which is home to approximately 60% of the IAMP. Notwithstanding this, under the duty-to-cooperate, the Council will work with other authorities to undertake additional work to further consider the impacts of the IAMP in the future once there is more certainty over the speed of delivery and its likely impacts. The monitoring framework for the IAMP AAP includes several specific indicators which will assist in undertaking this work.
- 6.82 The Council therefore prepared a further SHMA Addendum (2018) (SD.24)⁶⁰ to recalculate the OAHN for Sunderland (see SHMA Addendum 2018; Chapter 2) (SD.24). The calculation follows the same approach as that adopted in the previous SHMA Update (2017) (SD.23), but does not include a further uplift for IAMP, for the reasons set out above. The SHMA Addendum (2018) (SD.24) concludes that the OAHN for Sunderland is 13,410 dwellings over the plan period, which equates to an average of 745 dwellings per annum. This is the housing requirement taken forward in the plan.
- 6.83 It is recognised that a calculation of OAHN is not an exact science, but that reasonable assumptions must be used when undertaking the calculation. The Council considers it necessary to apply an uplift to support economic growth, as to fail to do so would result in planning for economic decline, or becoming more reliant on significant levels of in-commuting which is not considered to be sustainable. The level of uplift is considered to be reasonable as it is based on a realistic level of employment growth, which is broadly comparable (if slightly lower) than levels achieved over the last 18 years. The plan requirement would represent a significant level of population growth of above the demographic baseline forecasts and therefore to plan for higher levels of growth is considered to be unrealistic.

⁵⁷ [https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_\(2017\).pdf?m=636802955887300000](https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_(2017).pdf?m=636802955887300000)

⁵⁸ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

⁵⁹ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

⁶⁰ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

6.84 In May 2018 the ONS published its 2016 based subnational population projections, which showed a significant reduction in the levels of population growth forecast for the North East region as a whole, but particularly Sunderland, as set out in Table 12 below.

Table 12 Comparison between 2014 and 2016 based subnational population projections

	Population Growth (2014 based projections)	Population Growth (2016 based projections)	Change
Sunderland	+8,600	+2,450	-6,150
North East	+137,500	+84,579	-52,921

6.85 Subsequent to this, in September 2018 the ONS published the latest household projections, based on the 2016 based subnational population projections. As would be expected, the levels of household growth anticipated within Sunderland and the wider North East are forecast to be significantly lower under the 2016 based projections, as set out below.

Table 13 Comparison between 2014 and 2016 based household projections

	Household Growth (2014 based projections)	Household Growth (2016 based projections)	Change
Sunderland	+9,963	+5,044	-4,919
North East	+107,686	+75,894	-31,792

6.86 Whilst it is acknowledged that the PPG indicates that the latest population and household projections should be utilised when calculating OAHN, on 26 October 2018 the Government published its 'Technical consultation on updates to national planning policy and guidance'⁶¹.

6.87 This consultation document set out the Government's intention to amend national planning policy and guidance to update the methodology for assessing housing need to ensure that it is consistent with increasing housing supply, to ensure that the Government can deliver upon its ambition to enable the housing market to deliver 300,000 homes a year on average by the mid-2020s. As part of this consultation, paragraph 19 of the consultation document states that the Government propose to make the following three changes to the planning guidance:

1. For the short-term, to specify that the 2014-based data will provide the demographic baseline for assessment of local housing need;
2. To make clear in national planning practice guidance that lower numbers through the 2016-based projections do not qualify as an exceptional circumstance that justifies a departure from the standard methodology; and
3. In the longer term, to review the formula with a view to establishing a new method that meets the principles in paragraph 18 above by the time the next projections are issued.

6.88 Whilst it is acknowledged that these proposed changes relate to the calculation of local housing need for authorities submitting their plans for examination after the transitional period, it does signal the Government's commitment to using the 2014 based subnational population projections in the short-term to ensure that local plans continue to support housing growth.

⁶¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf

- 6.89 In addition, paragraph 22 of the consultation document acknowledges that in cases where the minimum annual housing need figure calculates using the standard method its identifying a number below the figures being taken forward by plan-making authorities (as is the case in Sunderland), the standard method is being used as the basis to challenge previous conclusions. The Government recognises that considering this challenge is likely to have resource implications and has the potential to cause delays.
- 6.90 As the OAHN and housing requirement within the Plan is based on the 2014 based projections, it is considered that this is the most appropriate approach, as this is consistent with emerging Government guidance.

Standardised Methodology for Calculating Local Housing Needs

- 6.91 In July 2018, the Government published its revised NPPF and updated the supporting PPG. Paragraph 60 of the updated Framework requires Local Planning Authorities to utilise a new methodology for calculating their Local Housing Need when preparing their emerging Local Plan.
- 6.92 In order to ensure that there were no unnecessary delays in the preparation of emerging Local Plans which had reached an advanced stage of preparation, Annex 1 of the new Framework includes transitional arrangements which ensure that any Local Plans submitted on or before the 24 January 2019 would be examined against the previous Framework (NPPF 2012). As the Plan has been submitted during this transitional period it has been prepared in accordance with the 2012 NPPF and associated guidance. It is therefore not considered appropriate for the Plan to utilise the standardised methodology for calculating Local Housing Need, which only applies to Local Plans being prepared and submitted under the provisions of the new Framework.

Housing Requirement

- 6.93 The housing requirement within this Plan has therefore been set at a level that supports the economic growth aspirations established by Experian and to meet housing needs.

Creating at least 7200 new jobs in Growth Sectors

- 6.94 The employment growth figure identified within the plan is consistent with the Experian jobs forecast which has been used calculate the OAHN (see Employment Land Review; Post EU Referendum Forecasting Analysis; pg 4-5) (SD.38). As noted earlier, this is considered to represent a realistic level of growth when compared to past trends.
- 6.95 In November 2017, Sunderland City Council and South Tyneside Council jointly adopted the International Advanced Manufacturing Park Area Action Plan (IAMP AAP) (SP.9), which allocates 150 hectares of land for automotive and advanced manufacturing uses on land to the north of the existing Nissan manufacturing complex. The significance of the site is recognised by the North East Local Enterprise Partnership through its inclusion within the North East Strategic Economic Plan (SP.33)⁶² as a key driver for economic growth within the region. The site has also been designated as a Nationally Significant Infrastructure Project (NSIP). Planning permission has been secured for the first phase of development on the site and work is well underway on the first building.
- 6.96 Furthermore, in order to ascertain whether the levels of employment growth within the plan are realistic, the Council has given consideration to existing pipeline schemes within the

⁶² [https://www.sunderland.gov.uk/media/20933/SP-33-More-and-Better-Jobs-The-North-East-Strategic-Economic-Plan-2017-/pdf/SP.33 More and Better Jobs The North East Strategic Economic Plan \(2017\).pdf?m=636803133284870000](https://www.sunderland.gov.uk/media/20933/SP-33-More-and-Better-Jobs-The-North-East-Strategic-Economic-Plan-2017-/pdf/SP.33%20More%20and%20Better%20Jobs%20The%20North%20East%20Strategic%20Economic%20Plan%20(2017).pdf?m=636803133284870000)

city. Since 2015, the Sunderland Economic Leadership Board have kept an investment profile for its 3,6,9 Vision (SP.31)⁶³, which includes known and planned private and public investments completing between 2015 and 2024. The latest update to the investment profile (dated 12/11/2018) shows a total of 12,122 jobs being created or announced within the city, which demonstrates strong jobs growth within the city. It should be noted however that the jobs identified within the investment profile identify new jobs being created and also included some jobs which are temporary in nature, which explains why this jobs number exceeds that proposed within the emerging plan which is a net jobs figure. A copy of the ELB's investment profile is shown in Table 14 below.

Table 14 ELB Investment Profile
Sunderland 369 Plan Investment Profile

Includes known and planned private and public investments completing between 2015 and 2024	Investment	Jobs (where known)	Floorspace (where known)
	£m		m2
Major Public investments and those in the public domain:			
Central Business District (Vaux Site)	25.4	432	5,481
Keel Square, St Mary's Boulevard and Vaux site access	12.6		
Commercial Development at Keel Square	10		
Hilton Hotel	12	100	
Hind Street Premier Inn Hotel	7.5	60	
Enterprise and Innovation Hub at the University	9	650	
Sunderland City College	29		12,500
NWC (Northern Spire)	117.6		
Sunderland Strategic Transport Corridor Phase 3	45		
SAFC Foundation Beacon of Light	16.5	131	11,560
University Phase 2 of New Sciences Complex	5.6		
International Advanced Manufacturing Park (Sunderland portion)		4,200	235,125
Private investment (development)	240		
Public investment (infrastructure)	60.6		
Old Fire Station - a new cultural hub	5.4		
Multi-use auditorium/entertainment venue	8.2		
Holy Trinity Church - Canny Space	3.8		
Hylton Castle	4.5		
Sunderland Railway Station	13.7	26	1,500
Low Carbon Enterprise Zone (round 1)	21		
Port Enterprise Zone (Round 2)	15	400	49,930
Washington Leisure Centre	11		
Seafront Infrastructure Works	3.7	521	
Heritage Townscape and High Street West	6		
Port of Sunderland rail connection	0.6		
Port infrastructure Improvements (drainage/hardstanding/lighting)	1		
Software City	2.6	75	
Washington Business Centre	6.6	200	5,200
Business Improvement District second phase	3.4		
Integrated Transport Economy & Place investments	18		
Northumbrian Water Strategic Investment	8		
Royal Hospital Emergency Department	20		
Sunderland Empire - Garden Place	0.5		

⁶³https://www.sunderland.gov.uk/media/20931/SP-31-Sunderland-Transforming-Our-City-The-3-6-9-Vision/pdf/SP.31_Sunderland_Transforming_our_City_-_The_3_6_9_Vision.pdf?m=636803132329670000

Great Place Scheme	1.3		
University of Sunderland School of Engineering	1		
Culture Company - NPO Status	2		
Northern Gallery for Contemporary Art at NGC	0.2		
Sunderland Energy Storage and Efficiency Pilot	3.4		
Believe in Me: Cathedrals to Creative Cities	0.7		
Sustainable Advanced Manufacturing	5.1		
EV 'rapid charging' Infrastructure	2		
Roker Pier	2.5		
Electric Vehicle hub (Parsons)	3		
Total Public/public domain	765	6,795	321,296
Major Private Investments (known to Business Investment Team):			
Individual Project details withheld for reasons of commercial confidentiality			
Total private investments (2015 - date)	559.1	5,327	
Housing Investments (Currently Under Construction)			
Total Housing Investments (2015 - date)	236.4		
GRAND TOTAL	1,560.50	12,122	321,296
Note: This table will be updated periodically. 12/11/2018			

6.97 Whilst it is recognised that the jobs target within the Publication Plan has dropped from that presented within the Plan, this is to avoid double counting the IAMP jobs. As noted earlier, 3,400 of the jobs growth contained within the Experian forecasts are within the two employment sectors most closely related to the IAMP. It would therefore not be appropriate to add the IAMP growth on top of the Experian baseline growth.

6.98 The Council therefore consider it a realistic and reasonable target to create 7200 new jobs during the Plan period.

Developing at least 95ha of employment land

6.99 In order to identify the likely land requirements for business and general industrial uses (B Use Classes) over the plan period, the Council prepared an Employment Land Review (ELR) (SD.37), which was published in March 2016. The ELR identified a need for between 95 and 115 hectares of employment land over the plan period from 2015 to 2033 (Sunderland Employment Land Review 2016; Para 9.15; pg 108) (SD.37)⁶⁴.

6.100 Following the Council's consultation on its Growth Options in Spring 2016 (SP.2)⁶⁵, concerns were raised by some representations that the Experian growth forecast that had underpinned the ELR was overly optimistic and did not take account of the potential adverse economic impacts of leaving the European Union. The Council therefore prepared an addendum to the ELR to take account of the potential impacts of Brexit utilising a post EU Referendum forecast from Experian, released in September 2016. The addendum, titled the 'Employment Land Review: Post EU Referendum Forecasting Analysis' (SD.38) was published in February 2017.

⁶⁴ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

⁶⁵ [https://www.sunderland.gov.uk/media/20906/SP-2-Core-Strategy-Growth-Options-Consultation-Responses-Perort-2016-/pdf/SP.2_Core_Strategy_Growth_Options_Consultation_Responses_Report_\(2016\).pdf?m=636803118435070000](https://www.sunderland.gov.uk/media/20906/SP-2-Core-Strategy-Growth-Options-Consultation-Responses-Perort-2016-/pdf/SP.2_Core_Strategy_Growth_Options_Consultation_Responses_Report_(2016).pdf?m=636803118435070000)

6.101 Whilst the overall jobs growth anticipated within the September 2016 forecast (7,200 workforce jobs) was significantly below that indicated by the May 2015 forecast (15,860 jobs), which underpinned the original ELR, the level of jobs growth anticipated within the B use classes remained broadly consistent, therefore the overall land requirement under 3 of the 4 scenarios remained fairly consistent with the original ELR, as shown in Table 15 below:

Table 15 Comparison of ELR Scenarios

	Baseline Jobs Growth		Policy-On Jobs Growth		Past Take-up Rates		Labour Supply	
	ELR (2016)	Addendum (2017)	ELR (2016)	Addendum (2017)	ELR (2016)	Addendum (2017)	ELR (2016)	Addendum (2017)
Offices (B1a/B1b)	8.1	6.0	9.5	7.2	20.0	20.0	7.4	5.8
Manufacturing (B1c/B2)	28.0	56.1	34.4	32.3	45.5	45.5	25.4	52.1
Warehousing/ Distribution (B8)	45.0	22.6	49.8	25.0	54.6	54.6	45.2	22.0
Total	81.1	84.7	93.7	64.5	120.1	120.1	78.1	79.9

6.102 However, under the policy-on jobs growth scenario, the employment land requirement identified through the ELR Addendum was significantly lower than that previously identified within the original ELR, falling from 93.7 hectares to 64.5 hectares. The Addendum therefore identified that there was some downward pressure which justified planning for the lower end of the 95-115 hectare range (Employment Land Review: Post EU Referendum Forecasting Analysis; Para 2.93; pg 20) (SD.38)⁶⁶. The plan therefore seeks to provide a supply of at least 95ha of employment land in order to meet identified needs within the plan period, which is consistent with the recommendations of the ELR and the post EU Referendum Addendum (SD.38).

6.103 The ELR considered the supply of available employment land within the city and made recommendations regarding the employment sites which should be retained and a further justification for some sites was provided within the ELR: Port EU Referendum Addendum (SD.38).

6.104 In September 2018, further site assessment work was undertaken to update the schedule of available employment land to take account of changes since the original site assessment work which informed the ELR was undertaken in 2015. This identified that there was a total of 92.85ha of general employment land available comprising of available land on designated Primary and Key Employment Areas, general employment sites at the Port of Sunderland which do not fall inside of the operational Port and the former Biffa landfill site at Houghton which has a current planning permission in place for general employment use. A full schedule of these sites is included in Table 15 below.

Table 15 Available Employment Land (September 2018)

Broad Location	Designation	Site	Net Land (ha)
Washington	PEA9: Turbine	Turbine Business Park (3) - East of Pub	1.22

⁶⁶ [https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_\(2017\).pdf?m=636802955887300000](https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_(2017).pdf?m=636802955887300000)

Washington	PEA9: Turbine	Turbine Business Park (3) - East of Spire Road	0.19
Washington	PEA9: Turbine	Turbine Business Park (3) - South of WBC	0.84
Washington	PEA9: Turbine	Turbine Business Park (3) - South East of FTC	0.81
Washington	PEA9: Turbine	Turbine Business Park (3) - West of Vantec	0.54
Washington	PEA9: Turbine	Turbine Business Park (3) - South of Test Track	2.56
Sub Total (PEA9: Turbine Park)			<u>6.16</u>
Washington	PEA8: Nissan	Turbine Business Park (1) (Nissan)	4.29
Washington	PEA8: Nissan	Hilthorn Farm (7)	2.29
Sub Total (PEA8: Nissan)			<u>6.58</u>
Washington	PEA10: Hillthorn	Hilthorn Farm (6)	12.81
Sub Total (PEA10: Hilthorne Farm)			<u>12.81</u>
Washington	PEA3: Glover	Tower Road (2)	0.24
Sub Total (PEA3: Glover)			<u>0.24</u>
Washington	KEA11: Hertburn	North Entrance to Industrial Park	0.21
Sub Total (KEA11: Hertburn)			<u>0.21</u>
Washington	PEA6: Stephenson	Former Northumbria Centre (1)	0.65
Washington	PEA6: Stephenson	East of Stephenson Road (2)	0.97
Washington	PEA6: Stephenson	East of Stephenson Road (3)	0.35
Sub Total (PEA6: Stephenson)			<u>1.97</u>
Washington	NEA10: Crowther	North of Crowther Road (3)	0.90
Washington	NEA10: Crowther	East of Crowther Road (1)	0.34
Sub Total (NEA10: Crowther)			<u>1.24</u>
Washington	PEA7: Wear	South of Sedling Road (2)	0.53
Washington	PEA7: Wear	North of Hankyu (6)	0.94
Sub Total (PEA7: Wear)			<u>1.47</u>
Washington	PEA5: Pattinson South	North of Sterling Close (1)	0.55
Washington	PEA5: Pattinson South	West of Sterling Close (3)	0.23
Washington	PEA5: Pattinson South	Holystone Waste Adjoining Railway	0.84
Sub Total (PEA5: Pattinson South)			<u>1.62</u>
Washington	PEA4: Pattinson North	Front James Steel (8)	0.63
Washington	PEA4: Pattinson North	James Steel Site 1 (7)	0.62
Washington	PEA4: Pattinson North	West of Walton Road (5)	0.64
Washington	PEA4: Pattinson North	South of Faraday Close (6)	0.87
Washington	PEA4: Pattinson North	Screen Print, North of Alston Rd / Walton Rd	1.69
Washington	PEA4: Pattinson North	North of Low Barmston Farmhouse (10)	2.18
Sub Total (PEA4: Pattinson North)			<u>6.63</u>
Washington	KEA9: Armstrong	Site at Armstrong Road	0.66
Sub Total (KEA9: Armstrong)			<u>0.66</u>
Total: Washington			<u>39.59</u>

Broad Location Coalfield	Designation	Site	Net Land (ha)
Coalfield	KEA15: Dubmire	East of Cherry Way (1)	2.19
Coalfield	KEA15: Dubmire	West of Cherry Way (4)	0.79
Coalfield	KEA15: Dubmire	South of Techniks	0.16
Sub Area Total (KEA15: Dubmire)			<u>3.14</u>
Coalfield	PEA2: Rainton Bridge North	Land to West of Former Sumitomo Factory (1)	2.36
Coalfield	PEA2: Rainton Bridge North	Gilpin Wood (former Glebe Farm Sewage Works) (6)	2.35
Sub Area Total (PEA2: Rainton Bridge North)			<u>4.71</u>
Coalfield	PEA13: Rainton Bridge South	North of Gadwell Road (1)	0.51
Coalfield	PEA13: Rainton Bridge South	South of Cyget Way (5)	5.72
Sub Area Total (PEA13: Rainton Bridge South)			<u>6.23</u>
Coalfield	KEA16: Houghton Market Place	Adjoining Readycrete Site	0.16
Sub Area Total (KEA16: Houghton Market Place)			<u>0.16</u>
Coalfield	KEA17: Hetton Lyons East	North of Colliery Lane (4)	0.37
Sub Area Total (KEA17: Hetton Lyons East)			<u>0.37</u>
Coalfield	Houghton Quarry	Biffa Landfill Site	4.08
Sub Area Total (Houghton Quarry)			<u>4.08</u>
Total: Coalfield			<u>18.69</u>
Broad Location Sunderland South	Designation	Site	Net Land (ha)
Sunderland South	KEA1: Hendon	Gasometers (3)	2.19
Sunderland South	KEA1: Hendon	East of Gasometers Depot, Spelter Works Rd (2)	1.90
Sunderland South	KEA1: Hendon	Paper Mill	7.50
Sunderland South	KEA1: Hendon	Commercial Road	2.61
Sub Area Total (KEA1: Hendon)			<u>14.20</u>
Sunderland South	KEA2: Leechmere	South West of Carrmere Road	0.13
Sunderland South	KEA2: Leechmere	North of Plumb Centre, Sandmere Road	0.29
Sub Area Total (KEA2: Leechmere)			<u>0.42</u>
Sunderland South	KEA4: Pallion	West of Eastern Way (9)	0.31
Sunderland South	KEA4: Pallion	Former Vishay Factory Pallion Way (8)	0.98
Sub Area Total (KEA4: Pallion)			<u>1.29</u>
Sunderland South	KEA5: Pallion Shipyard	North of Woodbine Terrace (1)	1.73
Sunderland South	KEA5: Pallion Shipyard	East of Woodbine Terrace (3)	0.71
Sub Area Total (KEA5: Pallion Shipyard)			<u>2.44</u>
Sunderland South	KEA6 Deptford	Former Corning Warehouse, Depford Terrace	6.02

Sub Area Total (KEA6: Deptford)			<u>6.02</u>
Sunderland South	Port	Barrack Street (3)	0.60
Sunderland South	Port	Prospect Road (2)	3.94
Sunderland South	Port	Disused Hendon Railway Sidings, Moor Terrace	0.50
Sub Area Total (Port)			<u>5.04</u>
Total: Sunderland South			<u>29.41</u>
Broad Location			
Designation			Site
Net Land (ha)			
Sunderland North			
Sunderland North	KEA7: Low Southwick	Crown Road (East of Quay West) (4)	0.13
Sunderland North	KEA7: Low Southwick	Wear Street (Land beside Q A Bridge 3)	0.18
Sunderland North	KEA7: Low Southwick	Wear Street/ Camden Street (1)	0.10
Sub Area Total (KEA7: Low Southwick)			<u>0.41</u>
Sunderland North	KEA8: North Hylton Road	Phoenix Tower Business Park	4.13
Sunderland North	KEA8: North Hylton Road	West of Castle Town Road	0.62
Sub Area Total (KEA8: North Hylton Road)			<u>4.75</u>
Total: Sunderland North			<u>5.16</u>

Sub Areas	Net Land (ha)
Washington	39.59
Coalfield	18.69
Sunderland South	29.41
Sunderland North	5.16
TOTAL	<u>92.85</u>

- 6.105 Whilst it is acknowledged that the supply of employment land currently falls slightly below the requirement set out within Policy SP1, it is acknowledged that the requirement for at least 95ha of employment land relates to a plan period from 2015 to 2033. Within the first three years of the Plan period there has been take-up of employment land which has resulted in the remaining supply of available land reducing for the remainder of the Plan period. Further justification for the supply of general employment land is set out within justification for Policies EG1 and EG2.
- 6.106 In addition to the supply of general employment land set out above, there is also the supply of additional areas of employment land within the city restricted for particular uses. The International Advanced Manufacturing Park is allocated for automotive and advanced manufacturing and is therefore not available for general industrial use. Similarly, the Port of Sunderland is safeguarded for port related development, with the exception of the sites identified in Table 15, which are located outside of the operational port and are therefore considered suitable for business and general industrial use.

Delivering at least 45,400m² new comparison retail development

6.107 The Sunderland Retail Needs Assessment (2016) (SD.39)⁶⁷ provides an up-to-date assessment of the quantitative and qualitative need that is likely to arise in the comparison and convenience sectors in the period up to 2025 and, more tentatively, up to 2035. Table 7.1 (pg 109) of the assessment (SD.39) identified that under a static retention rate there would be a quantitative need for a total of 50,500sqm of new comparison retail floorspace over the period to 2035, within the survey area. As the survey area extends beyond the administrative area of Sunderland, Table 7.7 (pg 113) (SD.39) provides what is considered to be a reasonable spatial distribution (including for the area beyond the administrative boundaries of the authority) based on constant market shares. The Council considers this to provide the most appropriate level of growth for comparison retail and this is taken forward within the policy.

6.108 It is proposed that the site allocations to meet this requirement will be set out within the Allocations and Designations Plan. Further justification for this approach is set out within the Vitality of Centres chapter.

Delivering necessary Infrastructure

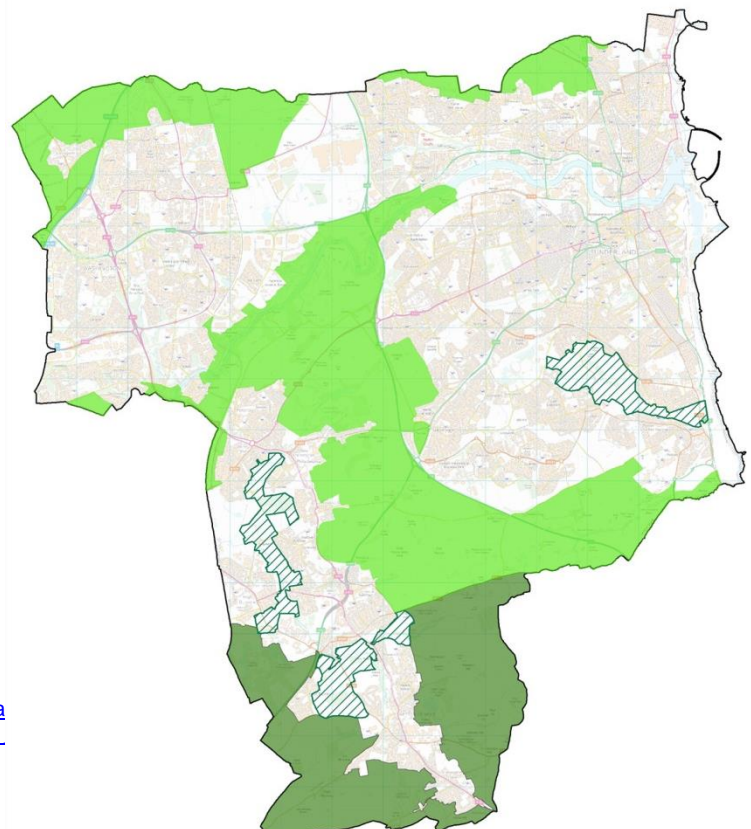
6.109 In order to deliver this level of growth, the strategy will ensure that necessary infrastructure, services and facilities are delivered. An Infrastructure Delivery Plan (IDP) (SD.59) has been prepared alongside this Plan, which identifies the key infrastructure requirements, anticipated costs and expected delivery. The IDP (SD.59) is a 'live' document that the council will monitor and review on a regular basis to reflect the current circumstances and to inform the Development Management process. The Infrastructure Schedule contained within the IDP (SD.59) sets out an overview of the key infrastructure requirements necessary to deliver this Plan.

Spatial approach to delivering the strategy

6.110 In line with sustainable development principles (as defined in the NPPF) and the need to make the most efficient use of resources, the spatial strategy establishes a planning framework for delivering a sustainable strategy for growth in the City, which recognises the unique character of Sunderland.

Sunderland Character Areas

6.111 Sunderland displays a polycentric development pattern - one which does not focus on a single centre, but on many centres. This combined with its industrial heritage and diversified economic growth in recent decades, as well as planning policy designations (such as Green Belt) has resulted in some constraints of where development can be focused in Sunderland. Land which runs along the northern edge of the administrative boundary of



Key
Existing Green Belt
Open Countryside

Figure 4 Green Belt, Open Countryside and Settlement Breaks

⁶⁷ <https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1>

Sunderland is part of the Tyne and Wear Green Belt. This also surrounds Washington, separating it from Sunderland to the east, Gateshead to the north and Durham to the west.

6.112 The Green Belt also extends to the south of Sunderland, separating Sunderland and Seaham. To the South of Seaham Road and within the smaller settlements within the Coalfield area there is open countryside, with some Settlement Break designations between built up areas. These Settlement Breaks were designated in 1965 their purpose is to ensure that new development is focused upon the existing built-up area is still of prime significance. This in turn has helped to stem encroachment and retain the distinctiveness of many communities. The Settlement Breaks have also helped to preserve vital Green Infrastructure corridors across the city.

6.113 Sunderland is spatially recognised by five unique sub areas. Each of these sub-areas are distinct, consequently, the nature of Sunderland’s development requires spatial planning that reflects its diversity of place. These Sub Area include;

6.114 **The Urban Core** - is the main administrative centre of city and includes wide diversity such as the City Centre, both campuses of the University of Sunderland and a number of key leisure and tourism facilities, including the Stadium of Light, the Empire Theatre, the Aquatics Centre and the Beacon of Light. The Urban Core is a heavily urbanised area close to the mouth of the River Wear covering an area of approximately 180 hectares. Due to its wide diversity of uses, the Urban Core contains a relatively modest population base of approximately 3,200 residents.



6.115 **Washington** - is a highly sustainable location, with excellent transport links to the City Centre, Durham, Gateshead, Newcastle and significant job opportunities at the IAMP, Follingsby Park and within Washington. Washington is a planned New Town with a population of circa 65,000 people. It accommodates a main town centre at The Galleries, a district centre at Concord and a series of smaller village centres. It is a principal location for jobs and continues to have the strongest employment market within the city.



Washington is also typified by having large amounts of greenspace, parkland and tree cover. Washington has an estimated 25,000 dwellings which equates to nearly 20% of the housing stock in Sunderland. The development of additional homes in this area has been constrained by Green Belt on all sides as well as the lack of available urban sites for development. During the period 2007 to 2015, only 652 homes or 93 homes per annum were built in the Washington areas. The latest Strategic Housing Land Availability Assessment (SHLAA) identifies land available to accommodate only 778 homes on 13 sites during the Plan period. This equates to 7% of the total land supply in Sunderland.

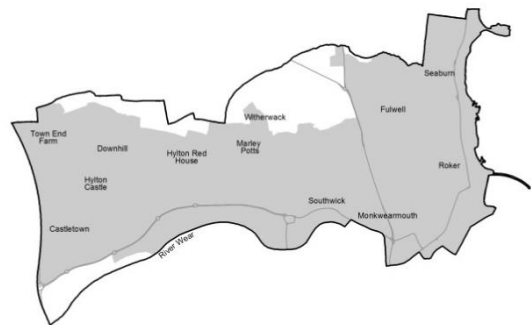
6.116 **The South Sunderland** - sub-area covers an area of 4,284 hectares and is the most populated sub-area of the city, with a population of 116,000. It is bounded by Green Belt to the south and west, coastline to the east and the River Wear to the north. Although South

Sunderland is oriented towards the city centre, the sub-area is also served by a number of district and local centres. It incorporates the Port of Sunderland and Doxford International as well as other key employment centres along the riverside, A19 and towards the coast.

6.117 South Sunderland is a popular residential area. The area contains the largest proportion of the city's housing stock and contains 47% of all deliverable and developable housing sites within the SHLAA, including the South Sunderland Growth Area (SSGA), which will constitute the largest urban extension in the city over the plan period. Despite being the most densely developed sub-area, the area contains a range of built and natural features which add to its character. The area has a distinct urban history and rich architectural heritage.

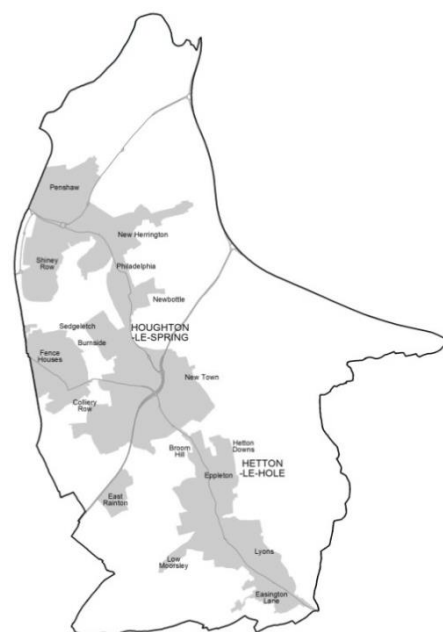


6.118 **The Sunderland North** - sub-area is highly urbanised with just over 55,100 residents and limited opportunities for development. It is bounded by Green Belt to the north, coastline to the east, the A19 to the west and River Wear to the south. Like South Sunderland, the sub-area is also oriented towards the city centre but it is also served by strong district centres at Southwick, Sea Road and Monkwearmouth, together with local centres further west. It incorporates a number of primary and key employment centres along the riverside/A1231 corridor and A19.



6.119 In recent years, housing regeneration has taken place that has delivered an increased choice of tenure and an improved quality and mix of homes. The highly developed nature of the sub-area means that new residential development opportunities will remain limited, but further urban regeneration will take place.

6.120 **The Coalfield** is the largest of the sub -areas in the city by area, covering over 5,500 hectares, approximately 42% of the city. It is made up of a number of former mining towns and villages that include Houghton-le-Spring and Hetton-le-Hole. It is the least densely populated of the sub-areas with some 46,000 residents (17% of the city's population). It is bounded by Green Belt to the north, west and east, with open countryside surrounding the south, which extends into County Durham. Houghton-le-Spring Town Centre serves as the principal centre in the Coalfield, with separate centres in Hetton-le-Hole to the south and Shiney Row to the north.



- 6.121 The principal employment area in the Coalfield is Rainton Bridge Industrial Estate and the area is also served by 4 smaller key employment areas. A key issue for Coalfield residents is the need for improved public transport connections to employment opportunities elsewhere in the city. The Coalfield has been the focus for new housing and housing regeneration over the past 20 years and will remain so within the plan period. However, supporting infrastructure is being increasingly impacted upon and will need significant investment. Although some greenfield land has been lost to development in recent years, the sub-area retains some of the highest levels of greenspace in the city. This has been increased in recent decades by reclamation of former industrial land and the creation of high quality country parks.
- 6.122 Due to the unique characteristics of these areas the Spatial Strategy includes a strategic policy for each sub area (SP2-SP6). Topic policies in the Plan relates to all sub areas.

Prioritising the Existing Urban Area and brownfield Development

Brownfield Development

6.123 Historically Sunderland has been very successful at developing previously developed land. In fact, between 1995 and 2015/16 90% of development in Sunderland was on previously developed land.

6.124 Although the emphasis of the strategy is to continue this trend and prioritise development on previously developed land and in sustainable locations with good transport links, there is a lack previously developed sites available in the supply. The Council’s latest SHLAA (SD22) identifies only 44% of new homes will be delivered on brownfield land. This is because the supply of brownfield sites that is considered to be deliverable is considered to be relatively low.

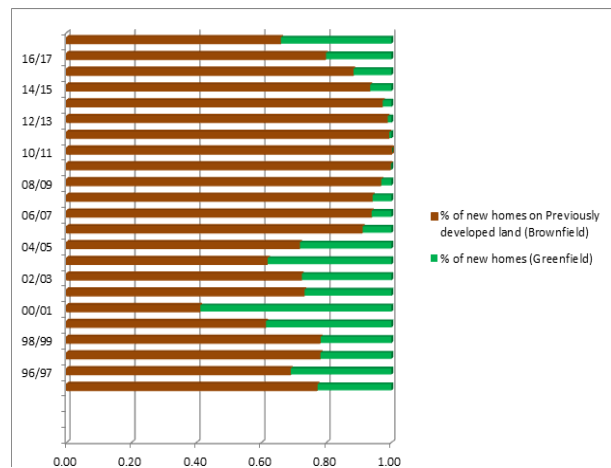


Figure 5 Proportion of Housing Completions on Previously developed Land

- 6.125 This is partially due to Sunderland historic use which has resulted in large sites which are heavily contaminated, unviable and difficult to attract developers to. The Councils latest Viability Assessment (SD.60)⁶⁸ concluded that Sunderland has challenging areas and previously developed land will be difficult to deliver and therefore sites in the Urban Core should not be heavily relied upon in the housing supply.
- 6.126 Despite the lack of suitable brownfield sites, the Council is actively encouraging the prioritisation of brownfield development in the Plan and through other mechanism, such as the Brownfield Register and Council intervention on sites.

⁶⁸ [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-pdf/SD.60 Whole Plan Viability Assessment \(with CIL Scoping\) \(2017\).pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-pdf/SD.60 Whole Plan Viability Assessment (with CIL Scoping) (2017).pdf?m=636803111173630000)

Maximising Densities

- 6.127 To meet the identified housing need, the Council has considered the densities of site to maximise the amount of development. However, as stated previously, Sunderland sub areas will mean that it is more appropriate to have a higher density in the the Urban Core than in Washington or the Coalfields.
- 6.128 The SHLAA (SD.22) has scrutinised the density levels used to forecast development capacity and compared these to recent developments to ensure they are realistic. The SHLAA workshop included discussions on the density assumptions that the Council had used within its SHLAA and it was considered that the density levels are robust. The NPPF requires Councils to include policies to maximise densities in their Plans, the Council considers that this approach is not appropriate for Sunderland as the City needs larger homes and bungalows.
- 6.129 The density assumptions reflect the SHMA (SD.23)⁶⁹ which highlights a need for future development to focus on delivering homes that address these identified mismatches and reflect household aspirations. Indeed in its summary of key drivers in determining the tenure and type of future development, *the SHMA (SD.23) identifies in particular the need for "the development of detached houses and a range of property sizes to offset identified market imbalances including larger 4 bedroom homes"*.

Existing Urban Area

- 6.130 The housing supply set out within the 2018 SHLAA (SD.22)⁷⁰, para.5.7, pg 30, identifies that around 13,233 of the 13,410 new homes needed can be delivered in the existing urban area. 19% of the OAHN has already been delivered and around 26% is either under construction or has some form of planning consent. The Council defines the Existing Urban Area as all land that is not settlement break or open countryside, Green Belt as shown on the Policies Map (Existing Urban Area –Figure 1 Key Diagram of this document).

Delivering the right type of Homes in the right locations

Delivering the right type of homes

- 6.131 The SHMA (SD.23) notes that there is a need 'to continue development to satisfy household aspirations, in particular the development of detached houses and a range of property sizes to offset identified market imbalances'. The SHMA (SD.23) identified that Sunderland's housing stock is dominated by terraced and semi-detached properties, and that there is a shortage of detached dwellings. Three quarters of all homes fall into the lowest Council Tax brackets which indicates a need to diversify the existing housing stock to ensure that sufficient homes are provided of the right type, in the right place and in the right tenure.
- 6.132 The findings from the SHMA have been taken into account within the Spatial Strategy, which confirms that there is limited choice in the city's housing stock and that this is an important factor in terms of retaining the economically active population within the local authority area. The strategy makes clear an intention to stem outward migration by providing new housing and desirable neighbourhoods which meet the diverse needs of existing and future residents, which will promote more sustainable patterns of development that support wider economic growth objectives.

⁶⁹[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

⁷⁰[https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

Homes in the Right Locations

- 6.133 As previously discussed, the Plan identifies an OAHN of 13,410. The spatial strategy seeks to deliver these homes in the most sustainable places on brownfield land and in the in the existing urban area. The spatial strategy also seeks to promote a balanced portfolio of sites across Sunderland to ensure that housing needs are adequately met in all sub areas. It also, seeks to align with the economic growth aspirations such as IAMP and the creation of 7200 new jobs with the housing strategy.
- 6.134 Over the past decade Sunderland has experienced an imbalance in housing delivery across the city. Completion data, illustrates that:
- 33 per cent of net additional dwelling completions (taking account of new builds, demolitions and conversions) delivered across Sunderland between 2008 and 2018 were in the Coalfield sub-area;
 - for the most recent 2017/18 monitoring period, some 43 per cent of net additional dwelling completions were in the Coalfield sub-area; and
 - in contrast, the five wards which make up Washington accounted for only 9 per cent of net additional dwelling completions in 2017-18 (74 from 880 dwelling completions, compared with 352 in Coalfield).

Table 16 Housing Development by Sub Area

NEW BUILD BY AREA	Total	Total %
Sunderland West	927	14.77%
Sunderland North	944	15.04%
Sunderland East	1432	22.81%
Coalfields	2042	32.53%
Washington	932	14.85%
TOTAL NEWBUILD (Net)	6277	100.00%

6.135 This has resulted in the Coalfield area becoming increasingly saturated with housing development. The Coalfield sub area is a collection of smaller settlements which are surrounded by settlement breaks and open countryside. Recently, as the Council has not had an up to date Local Plan and could not demonstrate a five year land supply, this area has witnessed a significant amount of housing growth, especially on greenfield sites, which has changed the urban footprint. Although infrastructure improvements have been made, evidence including the Transport Assessment (SD.51-53)⁷¹ and the IDP (SD.59)⁷³ has highlighted that the infrastructure could not accommodate a continuation of this growth. Therefore, the Spatial Strategy seeks to stem some of this growth in the future and redistribute to areas of the City where housing development has been limited due to policy constraints. The spatial strategy also aims to protect the Coalfield communities from merging together and therefore is proactively defended the settlement breaks and open countryside.

6.136 Washington and the North of Sunderland sub areas lack of available housing sites can be largely attributed to the presence of the Tyne and Wear Green Belt, which places a heavy

⁷¹[https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁷²[https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_\(2018\).pdf?m=636803107219430000](https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_(2018).pdf?m=636803107219430000)

⁷³[https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

constraint on the supply of suitable development land, and so locations such as Washington and Springwell have experienced limited development.

- 6.137 When looking to the future of for housing development in Sunderland. The SHLAA (SD.22) reinforces the North South divide by demonstrating that the majority of the identified land supply is located in South Sunderland (47 per cent) and Coalfield (28 per cent). A large proportion of the anticipated housing land supply in Sunderland South arises within the South Sunderland Growth Area (SSGA), which is a strategic allocation of approximately 3,000 dwellings over four sites (referenced in draft Plan Policy SS6).
- 6.138 In contrast, there are parts of the city where identified potential land supply is much lower:
- the identified supply in North Sunderland accounts for only 11 per cent of the overall theoretical supply;
 - the theoretical supply from sites in the Urban Core is 7 per cent; and
 - identified supply in Washington is also low at 7 per cent.
- 6.139 The spatial strategy seeks to readdress this imbalance and promote a balanced portfolio of sites across Sunderland to ensure that housing needs are adequately met in all locations, not only in the south of the city.
- 6.140 Washington, as discussed previously is a large urban area with a resident population of circa 65,000 persons and, as a planned New Town, it accommodates a wide range of shops and services both within the main town centre at The Galleries and also within a number of smaller local centres. Washington has also been a principal location for employment growth within the city and is forecast to continue to be so with the development of the IAMP and the ELR (SD.37) identifying Washington as having the strongest employment market within the city. For those reasons, Washington is an inherently sustainable location, more so than the smaller settlements within the Coalfield area. Furthermore, Washington is regarded as a more desirable and marketable housing area.
- 6.141 North Sunderland is a highly urbanised area and has been constrained in part due the Green Belt to the north, North Sea to the east and River Wear to the South. Although there are limited opportunities for housing growth in the sub area the Plan seeks to allocate additional land to accommodate some housing growth.

Exceptional Circumstances for Green Belt

- 6.142 Since the Council began preparing the Plan they have been assembling a credible evidence base to justify that they can meet their housing requirement. At the early stages of the Plan's preparation it became apparent that there was not sufficient land available within the existing urban area to accommodate the housing requirements in the longer term and therefore began a process of considering if there were exceptional circumstances to justify amending the Green Belt.
- 6.143 The Green Belt around Sunderland, South Tyneside and Gateshead was originally established in the 1960s and forms part of the wider Tyne and Wear Green Belt and later formalised in the Tyne and Wear County Structure Plan adopted in 1978. The statutory Green Belt formed an integral part of the broad strategy of the County Structure Plan to restrain the further spread of the Tyneside/Wearside conurbation, concentrating investment within the existing built-up area. Sunderland's Green Belt was originally intended to prevent the merging of Sunderland with Washington, Houghton-le-Spring and Tyneside. The Green Belt within Sunderland currently covers an area of approximately 3,500 hectares, equating to 25 per cent of the administrative area of the city. Sunderland's Green Belt boundary has

remained unchanged since 1998 and the preparation of the Plan is an appropriate juncture at which to consider whether it remains fit for purpose.

- 6.144 The government is very clear that Green Belt boundaries should only be altered through a Local Plan. Paragraph 83 of the NPPF explains that *'local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy'*, and that *'once established Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan'*. The NPPF compels local authorities to *'consider Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period'*.
- 6.145 When applying Green Belt boundary changes, paragraph 85 of the NPPF recommends that local planning authorities should apply the following criteria:
- ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
 - not include land which it is unnecessary to keep permanently open;
 - where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - make clear that the safeguarded land is not allocated for development at the present time; planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
 - satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 6.146 The Government has not defined what constitutes "exceptional circumstances". Demonstrating exceptional circumstances requires the presentation of a set of factors that come together to override the normal presumption that Green Belt boundaries should endure. As there is no formal definition or standard set of assessment criteria; it is for the local planning authority to determine whether it considers exceptional circumstances exist to justify removing land from the Green Belt.
- 6.147 Prior to the Submission Draft, the Council appointed consultants to provide a professional assessment as to whether there are exceptional circumstances which justify amending the currently defined Tyne and Wear Green Belt boundary to accommodate residential development within SCC's administrative area. The Exceptional Circumstances Report (SD.33)⁷⁴ examined the strategic context and existing evidence base insofar as it relates to the possible need to release of land from the Green Belt around Sunderland, which has involved a comprehensive review of relevant national and local policy and evidence base documents. The Report (SD.33) considers the exceptional circumstances case for amending the Green Belt revolves around the following important themes;
- Housing need
 - Housing land supply
 - Supporting economic growth

⁷⁴ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

- *Housing need*

6.148 As discussed previously, The SHMA Addendum report (2018) (SD.24) concluded that the OAHN for housing in Sunderland over the plan period 2015-2033 is established from a baseline of 570 net additional dwellings per annum ('dpa'), with an upward adjustment to take account of expected employment growth to 745 dpa. Due to the forecast demographic change within the city (as set out within the Edge Analytics Demographic Modelling Report (SD.21) published in October 2016), without providing an upward adjustment for economic growth, employment growth could not be supported due to the shrinking working age population. The only other alternative to support economic growth would be too reliant on extra in-commuting of workers who reside in other areas, which is not considered to be a sustainable option.

6.149 The SHMA Addendum 2018 (SD.24) recommended that the housing requirement for Sunderland should match the OAHN, indicating a need to deliver an average of 745 dpa, or 13,410 dwellings over the Plan period to 2033. This numerical target should be treated as a minimum rather than a cap on site allocations, as the NPPF identifies the need for plans to be responsive to market signals and states that local authorities should identify sufficient housing land to 'provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land'.

- *Housing Supply*

6.150 The Exceptional Circumstances Report (SD.33) builds on and reviews the evidence prepared by the Council during the preparation of the Plan. The starting point for the Council was ensuring that all alternatives parcels of land were included in the housing supply.

6.151 The Council back in 2016 undertook a Strategic Land Review (SP18-22)⁷⁵. The purpose of this assessment was to assess the suitability of all land within the city for development including;

- Green Space - The Council undertook a Green Space Audit, which was updated in 2018 (SD.47)⁷⁶ alongside the preparation of a Green Infrastructure Strategy (SD.46). Where land has been identified as low value to the local area (particularly where overall green space provision is high and the site in question has limited function and variety), the Council has assessed sites as part of the SHLAA process. As a result, a proportion of these sites were classed as being suitable for inclusion in the SHLAA (SD.22).
- Settlement Breaks – The purpose of the Settlement Breaks is to ensure that new development is focused within the existing built-up area. In turn, this has helped to stem encroachment into the Open Countryside and retain the distinctiveness of many communities, and the Settlement Breaks have also helped to preserve vital Green Infrastructure corridors across the city. As part of its approach to identifying additional land supply, the Council reviewed every parcel of land within the Settlement Breaks to

⁷⁵ [https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_\(2016\).pdf?m=636803125302300000](https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_(2016).pdf?m=636803125302300000)
[https://www.sunderland.gov.uk/media/20921/SP-19-Strategic-Land-Review-North-2016-/pdf/SP.19_Strategic_Land_Review_-_North_\(2016\).pdf?m=636803125698470000](https://www.sunderland.gov.uk/media/20921/SP-19-Strategic-Land-Review-North-2016-/pdf/SP.19_Strategic_Land_Review_-_North_(2016).pdf?m=636803125698470000)
[https://www.sunderland.gov.uk/media/20922/SP-20-Strategic-Land-Review-West-2016-/pdf/SP.20_Strategic_Land_Review_West_\(2016\).pdf?m=636803126114970000](https://www.sunderland.gov.uk/media/20922/SP-20-Strategic-Land-Review-West-2016-/pdf/SP.20_Strategic_Land_Review_West_(2016).pdf?m=636803126114970000)
[https://www.sunderland.gov.uk/media/20965/SP-21-Strategic-Land-Review-East-2016-/pdf/SP.21_Strategic_Land_Review_-_East_\(2016\).pdf?m=636803829337870000](https://www.sunderland.gov.uk/media/20965/SP-21-Strategic-Land-Review-East-2016-/pdf/SP.21_Strategic_Land_Review_-_East_(2016).pdf?m=636803829337870000)
[https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_\(2016\).pdf?m=636804033613030000](https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_(2016).pdf?m=636804033613030000)

⁷⁶ [https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_\(2018\).pdf?m=636802959791130000](https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_(2018).pdf?m=636802959791130000)

determine whether they meet the purposes of the Settlement Break. As a consequence of the review, it proposed that the land within the Settlement Breaks designation will be reduced by 35 per cent. A number of these identified areas that were not performing as Settlement Breaks (but were in sustainable locations and deemed suitable for housing) have been included in the SHLAA (SD.22), and many of those sites are currently being developed. The remaining parts of the Settlement Breaks are those which are considered to be fundamental to their purpose, and the Council is concerned that further eradication of the Settlement Breaks would render them not fit for purpose.

- Open Countryside – The Council has identified a small number of sites that are on the urban edge which could come forward for development and are being actively promoted. Overall, the Council does not consider it to be a sustainable approach to have a spatial strategy in its emerging Core Strategy which would direct development to Open Countryside locations as these areas are isolated and not well-connected to necessary infrastructure and employment opportunities.
- Employment Land – The 2016 ELR (SD.37) was prepared to identify the scope for economic growth within Sunderland and the amount of employment land which would be required within the plan period to facilitate the levels of growth anticipated. The ELR (SD.37) identified a need for between 95 and 115 hectares of general employment land within the city to meet the anticipated levels of economic growth within the plan period from 2015 to 2033. This was considered to be additional to the IAMP growth, as the impacts of the IAMP were taken into consideration as part of the analysis. The 2016 ELR (SD.37) recommended the deallocation of 14 sites, which would bring the overall supply of employment land within the city down to 104.48ha. However, since the publication of the ELR (SD.37), a number of other employment sites have been lost to alternative forms of development, resulting in the supply of employment land becoming particularly tight. The Council therefore needs to safeguard the remaining supply to ensure that it can maintain an adequate supply of employment land throughout the plan period.

6.152 The Council took the outcomes of the SLR assessment (SP.18-22)⁷⁷ into account and assessed suitable sites in the Strategic Housing Land Availability Assessment (SHLAA) (SD.22). To ensure the approach was robust, the Council updated the SHLAA methodology (SP.57)⁷⁹ to ensure that it was in accordance with the NPPF and in accordance with the Tyne and Wear SHLAA methodology and undertook a technical consultation in November 2016.

6.153 The SHLAA (SD.22) has assessed the suitability, availability, and deliverability of a wide range of sites across the city and took into consideration new evidence including the viability report (SD.60). At different stages of the Plan, the SHLAA (SD.22) has identified different supply against the emerging OAHN. The SHLAA 2017 identified 134 sites as deliverable and developable for housing over the remainder of the plan period (2017-2033), with a total combined capacity for 10,868 potential homes. This should be compared with the housing requirement of 13,824 (minus the housing completions for 2015-16 and 2016-17) leaving a target figure of 12,225 homes for the remaining plan period. There is therefore a shortfall of 1,357 homes.

⁷⁷ [https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_\(2016\).pdf?m=636803125302300000](https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_(2016).pdf?m=636803125302300000)

⁷⁸ [https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_\(2016\).pdf?m=636804033613030000](https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_(2016).pdf?m=636804033613030000)

⁷⁹ [https://www.sunderland.gov.uk/media/20956/SP-57-Strategic-Housing-Land-Availability-Assessment-2016-/pdf/SP.57_Sunderland_Strategic_Housing_Land_Availability_Assessment_Methodology_Final_\(2016\).pdf?m=636803147428800000](https://www.sunderland.gov.uk/media/20956/SP-57-Strategic-Housing-Land-Availability-Assessment-2016-/pdf/SP.57_Sunderland_Strategic_Housing_Land_Availability_Assessment_Methodology_Final_(2016).pdf?m=636803147428800000)

- 6.154 Following consultation on the Draft Plan, the SHLAA (SD.22)⁸⁰ was reviewed to take into account comments submitted. In total, the SHLAA 2018 (SD.22) concluded that 136 specific sites were theoretically deliverable and developable for housing over the remainder of the emerging Local Plan period (2018-2033), with a total combined indicative capacity of 10,225 dwellings (excluding student accommodation). After applying allowances for small site completions and demolitions, the overall theoretical supply increases to 10,754 dwellings over the remainder of the plan period to 2033. Taking account of the 2,479 net dwelling completions from the beginning of the plan period 2015/16 to 2017/18 gives a total supply of 13,233 dwellings over the plan period. The total supply of 13,233 dwellings results in a shortfall of 177 dwellings in relation to the 18-year plan period housing requirement of 13,410 units.
- 6.155 Notwithstanding the above, it is considered unrealistic to expect every SHLAA site to develop out according to the 2018 SHLAA assessment (SD.22). The SHLAA (SD.22) is an assessment at a point in time, based on the best available evidence and information. While we consider that the SHLAA (SD.22) provides a robust assessment regarding deliverability and developability, it is inevitable that difficulties may occur in bringing forward some sites identified through the SHLAA within the plan period, as permissions will lapse, viability will change and detailed site investigations may stall or delay sites. To rely purely on the SHLAA (SD.22) supply coming forward as anticipated without any flexibility may put the deliverability of the plan at risk. As such, building in a flexibility factor which will bolster the supply is considered reasonable and necessary to guard against under-delivery.
- 6.156 The Council has also considered whether neighbouring authorities could accommodate Sunderland's housing shortfall. However, this option was not considered to be appropriate given that a strategic priority of the emerging new Local Plan is to reverse the trend of outward migration to surrounding authorities and retain more of the working age population. In addition, all neighbouring authorities have or are considering amending their Green Belt boundaries to accommodate their own growth. South Tyneside Council, Gateshead and Durham County Council have confirmed that they cannot accommodate any of Sunderland's growth without identifying land in the Green Belt.
- 6.157 Although there is a shortfall of land to meet the housing requirement, this is not the only reason the Council consider it necessary to consider amending its Green Belt boundary. Sunderland has historically experienced an outward migration trend; this has had implications for economic, housing and transport policy. As explained earlier, the latest population projections indicate that the size of the working age population within the city is expected to shrink by over 3,000 people over the plan period. As a result, in order to support economic growth within the city, it is necessary for the Council to provide an uplift to its housing requirement ensure that there is an adequate workforce to support jobs growth.
- *Economic Growth*
- 6.158 Without providing an uplift to support economic growth, the only way that jobs growth within the city could be supported would be through becoming increasingly reliant on additional in-commuting from workers who are resident in other areas. This is not considered to be a sustainable approach.

⁸⁰[https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

- 6.159 The plan seeks to deliver at least 7,200 net additional jobs over the plan period, which is based on a post-EU Referendum jobs forecast (SD.38)⁸¹. This is considered to be realistic as, over the past 18 years (1997-2015), some 9,630 net additional jobs were created within the city. The IAMP is an important driver for economic growth and this will have a consequential impact on the demand for new housing in the northern part of the city. It is anticipated that approximately 7,850 people will work at the IAMP, and the background reports (SP.12) to the IAMP AAP (SP.9)⁸² suggest that there is a particular need to increase the proportion of detached 4-bedroom and semi-detached 3-bedroom properties to reflect the profile of dwellings required to support the anticipated influx of workers. The evidence presented suggests that the strongest aspirations are likely to be for detached properties with 3 or 4 bedrooms, bungalows, and 3-bedroom semidetached properties.
- 6.160 The evidence associated with the IAMP AAP (SP.9) establishes a very clear link between the development of the IAMP and the need for additional housing to support the anticipated workforce, in particular a need for more, larger homes. This would indicate a need to identify suitable sites near the IAMP site to accommodate additional residential development, to ensure that the housing supply reflects the needs of the workforce, and also support sustainable patterns of development that will avoid the need for long distance commuting from either outside the area or from other parts of the city which are further afield.
- 6.161 Whilst the IAMP will be the most significant driver for economic growth within the city, there are a number of other key employment areas within the city which will support economic growth. The plan identifies the Vaux as a strategic mixed-use site within the Urban Core, which will provide a focus for office-led development within the city, thereby assisting in the revitalisation of the Urban Core. The Port of Sunderland also provides an opportunity for expansion and growth alongside a number of Primary and Key Employment Areas distributed throughout the city. The Experian jobs growth forecast (SD.38), which has informed the preparation of the plan, identifies approximately 55 per cent of the anticipated jobs growth over the plan period will be in employment sectors that are unrelated to the IAMP and therefore supporting wider economic growth in these other sectors is a key consideration.
- 6.162 It is clear from the available evidence that the identified housing targets and spatial strategy objectives cannot be achieved without the release of greenfield sites in Green Belt locations. The combined evidence has identified all available and viable brownfield land and maximised residential development densities.
- 6.163 Urban greenfield sites have been fully considered, together with identifying suitable sites for development within the city's Settlement Breaks and Open Countryside. The potential contributions from surplus employment sites and low-value green space has also been exhaustively considered. A shortfall in housing supply remains, and neighbouring local authorities have confirmed that they are unable to provide land to meet this shortfall.
- 6.164 All of the above suggests the need to also include a reasonable flexibility factor within the housing land approach of the Plan to guard against under delivery on non-strategic sites. Such flexibility will be essential to provide a sufficient quantum, range and mix of housing

⁸¹[https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_\(2017\).pdf?m=636802955887300000](https://www.sunderland.gov.uk/media/20881/SD-38-Employment-Land-Review-Post-EU-Referendum-Forecasting-Analysis-2017-/pdf/SD.38_Employment_Land_Review_-_Post_EU_Referendum_Forecasting_Analysis_(2017).pdf?m=636802955887300000)

⁸²[https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-/pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_\(2017\).pdf?m=636803121719830000](https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-/pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_(2017).pdf?m=636803121719830000)

to meet Sunderland's OAHN at all times up to 2033, as required by the NPPF. Flexibility is also needed to ensure that Sunderland's housing land approach supports the delivery of the wider spatial strategy as set out within the Plan, in particular by avoiding overdevelopment where this would result in unacceptable pressure on infrastructure and by supporting proposals to increase economic growth in sustainable locations.

- 6.165 Therefore, the Council considers that the Green Belt within Sunderland's administrative area is the only other available source of land that could realistically address the shortfall while still supporting a sustainable pattern of development.

Housing Growth Areas – Amending the Green Belt Boundary

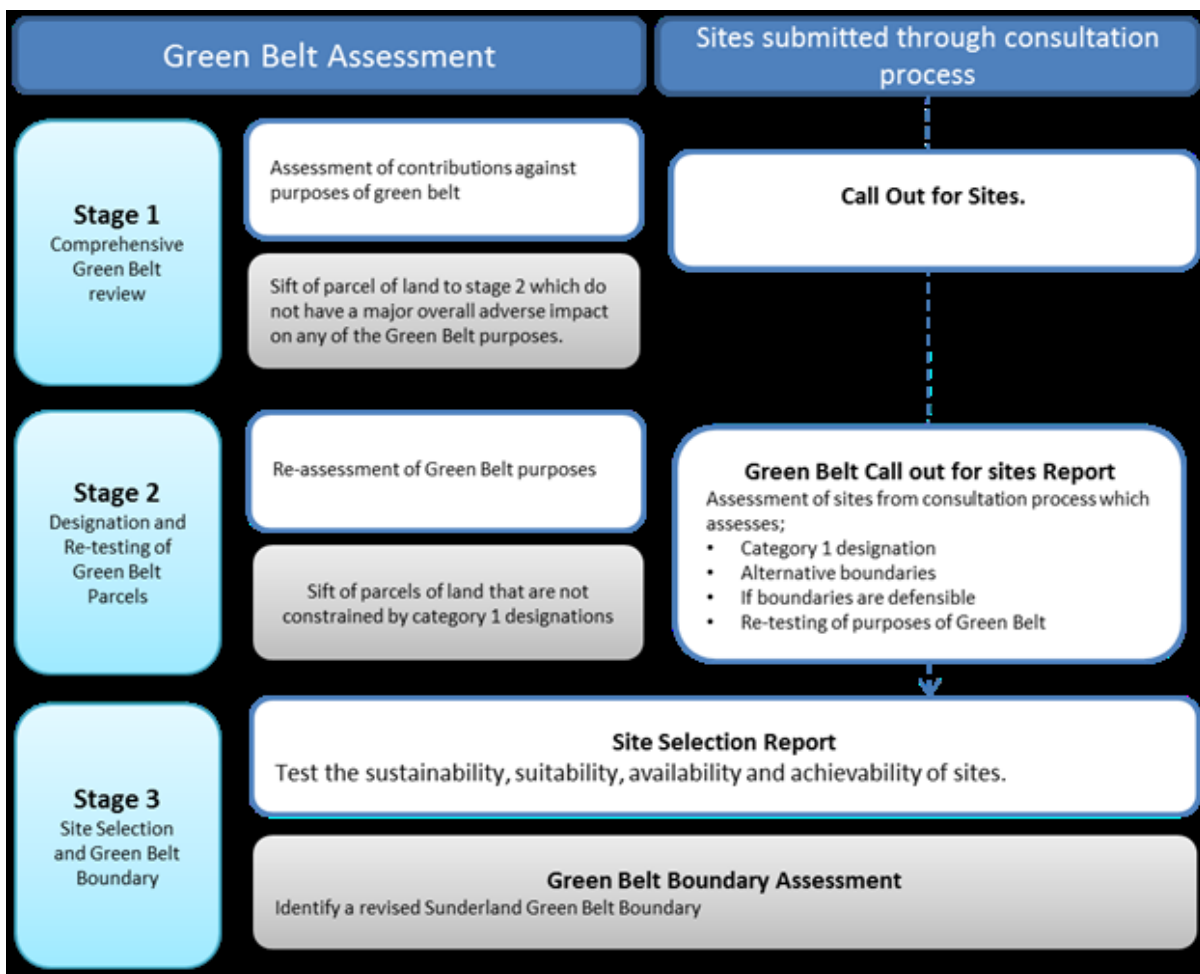
- 6.166 Paragraph 84 of the NPPF then states that: 'When drawing up or reviewing Green Belt Boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt Boundary, towards towns and villages inset within the Green Belt Boundary or towards locations beyond the outer Green Belt boundary'.
- 6.167 When defining Green Belt boundaries, paragraph of 85 the NPPF recommends that local planning authorities should apply the following criteria:
- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
 - *not include land which it is unnecessary to keep permanently open;*
 - *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
 - *make clear that the safeguarded land is not allocated for development at the present time; planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
 - *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
 - *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*
- 6.168 The Council has undertaken a three-stage review of the Green Belt across Sunderland, as well as an independent Green Belt boundary review. In summary:
- Stage 1 (SD.29)⁸³ assessed the entire Green Belt against the purposes of the Green Belt. In assessing the city's Green Belt, 13 sub-areas were defined based on permanent and defensible 'strategic' boundaries in accordance with the NPPF. These sub-areas were sub-divided into parcels. The assessment concluded that some 63 per cent of the Green Belt should be retained without further examination at Stage 2, as this land was clearly identified as being fundamental to the purposes of the Tyne and Wear Green Belt. The remaining 37 per cent was considered at Stage 2 of the Green Belt Review (SD.30).
 - Stage 2 (SD.30)⁸⁴ of the review identified whether parcels are constrained by 'Category 1' constraints (nationally protected designations) and are therefore

⁸³[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

⁸⁴[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

unsuitable for development. The Council also comprehensively assessed parcels of land submitted by developers.

- Stage 3 (SD.31)⁸⁵ took the outcome of Stage 2 (SD.30) and assessed the sites against a range of criteria including sustainability, suitability, achievability and deliverability. The sites identified as causing the least harm to the Green Belt and considered to be the most suitable and sustainable were identified in the draft Local Plan as 'Housing Growth Areas' (previously referred to as 'Housing Release Sites'), and they have been assessed as part of the Sustainability Appraisal of the Plan.
- Green Belt Boundary Review (SD.34)⁸⁶ considered role performed by each of the 13 sub-areas, and provided recommendations regarding the boundaries for the 11 proposed Housing Growth Areas, as well as the boundary for the proposed Safeguarded Land. The Review also suggested various other adjustments to the Green Belt, which includes both additions and deletions.



6.169 These reports have specifically identified and justified 11 sites to come forward for housing. The Council's considers that the 11 sites, known in the Plan as Housing Growth Areas are all in sustainable locations offering least harm to the Green Belt when considered against

⁸⁵ [https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

⁸⁶ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

the first three purposes set out in paragraph 80 of the NPPF and a wide range of other relevant factors, whilst rejecting all other areas because of their impact to Green Belt purpose, environmental sensitivity and lack of sustainable development.

- 6.170 6 of the 11 sites are on the urban fringes of Washington. These offer sustainable sites that help to address the shortfall of housing sites in the SHLAA (SD.22) (which largely emanates from the tightly bounded Green Belt that surrounds the New Town). Two of the 11 sites are in North Sunderland, again on the city's urban fringes. These sites also help to address the shortfall of SHLAA (SD.22) housing land in this part of the city. The remaining 3 sites lie in the city's North Coalfield area. There has been considerable change in the area, both in terms of new house building and in terms of environmental reclamation. Two of the sites (New Herrington and Philadelphia) specifically support wider area regeneration. The third site, Peshaw, constitutes a large development within the Green Belt, but in an area where the Green Belt is particularly extensive and wide, and where the quantity of publicly available greenspace is higher than any other Ward across the city area.

Housing Growth Areas –Suitability for Housing Development

- 6.171 The Green Belt Review (SD29-34)⁸⁷⁸⁸ has identified sites which only make a relatively limited contribution to Green Belt objectives and cause the least harm to the Green Belt. Simultaneous, as this review was being prepared the Council rigorously tested sites for suitability, sustainability and deliverability.
- 6.172 All HGAs have been assessed as part of the SHLAA (SD.22) (however are not included in the supply until such time as they are allocated) to determine their suitability, availability, and deliverability. Through the Green Belt Review Part 2 (SD.34) and Sustainability Appraisal (SD.5-6) the sustainability of the HGAs has been tested. In addition, the Council prepared Development Frameworks (SD.35)⁸⁹ to technically assess each site in detail to ensure deliverability. These Frameworks (SD.35) are based on technical studies on the sites.
- 6.173 The spatial strategy allocates 11 Housing Growth Areas (HGAs) (Policies SS2, SS4 and SS7) and amends the Green Belt boundary (as defined on the Policies Map). These HGAs will be able to deliver approximately 1330 new homes during the Plan period. Policies contained in the spatial strategy will help to ensure comprehensive co-ordinated development of sites by ensuring that the development addresses site specific issues. This approach to the expansion of neighbourhoods and villages to protect environmental assets and to ensure the delivery of quality and sustainable developments.

Protecting Sunderland's Character

- 6.174 The spatial strategy seeks to protect greenspaces in the city, including the Settlement Breaks, which form valuable breaks between distinct settlements within Sunderland. The spatial strategy proposes to continue their designation and prevent further encroachment.

⁸⁷ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

⁸⁸ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

⁸⁹ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

Settlement Breaks

- 6.175 Settlement Breaks can be traced back to the mid-1960's in Sunderland. They relate to the protection of open breaks and wedges between settlements that are not afforded Green Belt protection. They have 3 purposes:
- help to retain the distinct physical characteristics of the City's constituent communities
 - assist in the regeneration of the older or poorer quality urban areas by focusing resources and investment into the built-up area
 - provide open space lungs, sometimes incorporating leisure/recreational facilities which help to alleviate local deficiencies.
- 6.176 These functions are still relevant. Although Settlement Breaks and Green Wedges are not directly identified in the NPPF, their purpose is clearly supported, in supporting the conservation of Green Infrastructure and in maintaining an area's local character and setting. This is set out in NPPF paragraphs 20, 91, 122, 127, 148, 149, 150, 170, 171, 174 and 175.
- 6.177 The 2018 Settlement Break Review (SD.48)⁹⁰ assessed every parcel of land within the Settlement Breaks and concludes that, overall, the purposes of the Settlement Breaks have performed well (see 2018 Settlement Break Review pages 7-9) (SD.48). It is clear in most cases that settlement distinction and identity has been supported, whilst at the same time new development has been focused primarily on the urban area and often on brownfield land. These breaks have played a key role in helping to preserve Green Infrastructure corridors within and on the fringes of our built-up areas. However, in recent years, parts of Settlement Breaks have been subject to proposed housing development.
- 6.178 The Review (SD.48) concluded that 65% of the Settlement Breaks should be retained. Cumulatively, this land has a key green infrastructure role to play, and in many cases is affected by significant natural and physical constraints. They also continue to serve an important role in defining urban area boundaries, supporting urban regeneration and settlement character. The remaining 35% of land has more limited Settlement Break role, much of which is subject to proposed housing development, subject to careful and sensitive mitigation. Some areas to be removed from the Settlement Break will be put forward for protection as Green Infrastructure corridors or as greenspace in the forthcoming Allocations and Designations Plan. These areas have less of a role to play in terms of settlement separation. There is also scope for appropriate constraints mitigation and minimising impacts to Green Infrastructure corridors.
- 6.179 In addition, further areas are to be added as Settlement Break. The 1998 UDP did not allocate land as Settlement Break if it was separately identified as providing existing or proposed open space or as protected wildlife sites. This includes large sections of wildlife corridors such as the Tunstall Hills or at Flint Mill in Houghton-le-Spring that demonstrates clear connecting roles to the purposes of Settlement Breaks (see 2018 Settlement Break Review, pages 171-173) (SD.48). These sections add approximately 120 hectares to the overall Settlement Break area. Overall, 190 hectares of land is proposed for Settlement Break deletion, with 122.6 hectares proposed for addition. The Council therefore consider it to be appropriate to continue the designation of Settlement Breaks in the Plan to ensure their long term protection.

⁹⁰ https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

Open Countryside

- 6.180 The southernmost part of the city- chiefly to the west, east and south of Hetton-le-Hole- is not constrained by Green Belt or Settlement Break, and represents the most rural parts of the city. This is known as Open Countryside. After 30 years of focused development in the Coalfield area, these more remote areas of open countryside are increasingly being targeted for residential development. Consequently, the Council consider it pertinent to protect the Open Countryside in Sunderland whilst recognising its role and function.
- 6.181 NPPF paragraph 17 identifies the countryside and its intrinsic character and beauty as a core planning principal. The Council has considered the development of parts of the open countryside for development, but as identified in the SLR (SP.18-22) these development opportunities are considered to be remote and rural, with numerous physical and environmental constraints/features. Overall the Open Countryside is an area of higher landscape value and provides quality wildlife / Green Infrastructure corridors. Therefore development in the Open Countryside would represent the least sustainable pattern for development and should be protected.

Reasonable Alternatives

- 6.182 In regards to reasonable alternatives for a spatial strategy, the Council has considered a number of alternatives. This has included;

Alternative OAHN

- 6.183 The Council has considered a number of alternative scenarios when calculating its housing requirement within the Plan.

Standardised methodology

- 6.184 The Government published its 'Planning for the Right Homes in the Right Places' consultation document in September 2017 and followed this up with a revised draft NPPF which was published for consultation in March 2018. These documents sought to introduce a standardised methodology for the calculation of a local authority's housing need
- 6.185 Under the standardised methodology Sunderland's OAHN would equate to 263 net additional dwellings per annum over the period from 2018 to 2028. This is based predominantly on the 2016 based subnational population projections, however does apply a slight uplift based on the affordability criteria. Under the transitional arrangements set out within Paragraph 214 of the revised NPPF (2018), the Government indicates that any Local Plans which are submitted for Examination in Public prior to the 24 January 2019, will be examined against the 2012 Framework. As the Plan has been submitted in advance of this deadline it has been prepared based on the 2012 Framework and its associated guidance. It is therefore not considered appropriate to use the standardised methodology for calculating the housing requirement for the plan.
- 6.186 Notwithstanding this, the updated Planning Practice Guidance indicates that the standard methodology provide the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher than the figure identified by the standard method.
- 6.187 The PPG goes on to state that where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and

separate from considering how much of this need can be accommodated in a housing requirement figure. Circumstances where this may be appropriate include, but are not limited to:

- where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);
- where strategic infrastructure improvements are planned that would support new homes;
- where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground.

6.188 The IAMP is a Nationally Significant Infrastructure Project (NSIP) which is expected to drive economic growth within Sunderland and the wider North East region and therefore even if the standardised methodology was to be utilised as the starting point, the Council are satisfied that the circumstances for an uplift to this are justified.

Affordable Housing

6.189 The Council recognise that there is a currently a significant affordable housing imbalance within the city, with the SHMA Update (2017; Section 6) (SD.23)⁹¹ identifying an imbalance of 542 net additional dwellings per annum over the period from 2016/17 to 2020/21. Consideration was given to whether there was any justification to further uplift the housing requirement within the plan to help address the affordable housing imbalance more quickly (see SHMA Addendum 2018; Paras 2.27-2.30) (SD.24), however it was determined that this would not be appropriate for several reasons.

6.190 Firstly the OAHN figure identifies the overall need for market and affordable housing. The affordable housing component is therefore already embedded within this calculation. Secondly, the annual imbalance set out within the SHMA (SD.23) is not a target for delivery, but expresses the overall need from household survey evidence compared with the current supply of affordable housing. In reality, households in need who cannot access the market can pay proportionately more for their housing above the suggested affordable thresholds, people can share dwellings to reduce housing costs, and the private rented sector has the potential to accommodate households in affordable housing needs.

6.191 Finally, the affordable housing imbalance of 542 net additional dwellings per annum is based on seeking to address the backlog over the first five years of the plan period. However, if the backlog is addressed over a longer period this brings the annual affordable housing imbalance down to a level which can be achieved through the policy requirements of the plan.

Additional uplift to support the IAMP

6.192 The Council has given consideration to providing an additional uplift to the housing requirement to support the delivery of the IAMP and ensure an appropriate supply of housing to meet the needs of IAMP workers (see SHMA Addendum 2018; Paras 2.17-2.23)⁹² (SD.24), however as a large proportion of the jobs within the underlying Experian forecast were already account for within the economic growth uplift, this was not considered appropriate. Further detail is set out above within the Justified section of the Compliance Paper.

⁹¹[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

⁹²[https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

6.193 It is noted that some concern was expressed regarding a potential skills mismatch between existing residents and the jobs on the IAMP, however the Council is working closely with local educational institutions to ensure that the skills base of the local workforce matches the opportunities available on the IAMP.

Alternative approach for Retail growth

6.194 Following representations received on the plan, consideration was given to the overall quantum of comparison retail floorspace planned for within the city over the plan period and whether this was being overambitious. The assumptions made as part of the Retail Needs Assessment (2016) (SD39-42)⁹³ were again looked at to see whether they provide a robust and up-to-date evidence base on which to base the plan. Whilst it is acknowledged that there has been more up-to-date data released than the assumptions utilised within the Retail Needs Assessment (SD.39-42), the Council does not consider that these would justify a change of approach.

6.195 The population projections which underpin the Retail Needs Assessment (2016) (SD39-42) are the 2012 based subnational population projections, which were the latest available at the time. Whilst there have been two further releases of population projections since this date, the latest projections (the 2016 based population projections) project a similar level of population growth to the 2012 based projections (see Figure 6 below), with the population

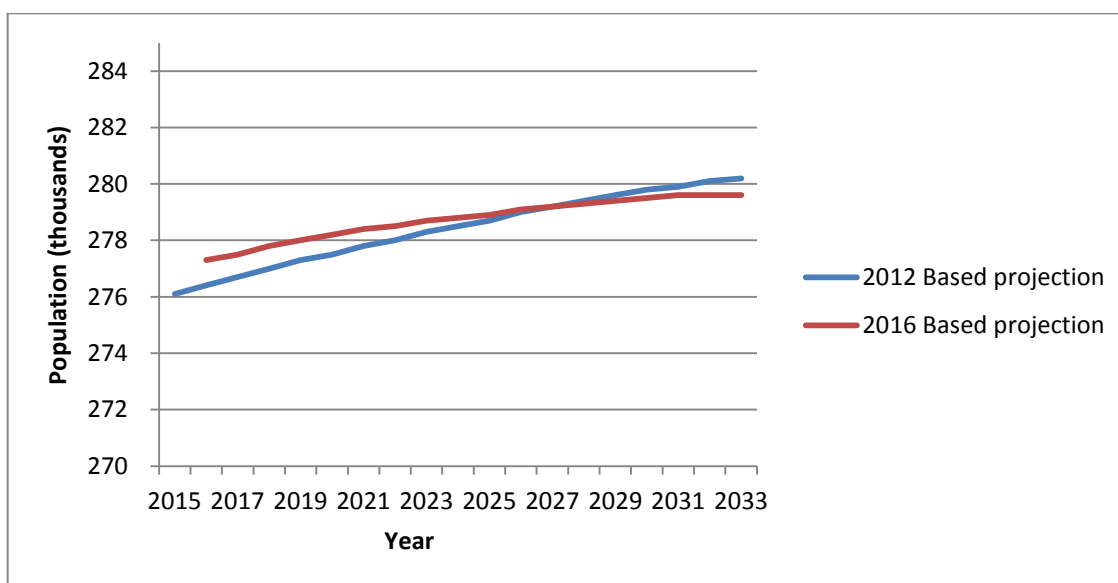


Figure 6 Comparison between 2012 and 2016 based subnational population projections.

6.196 The forecast levels of growth in comparison goods spending between those published in Experian Retail Planner Briefing Note 13 (October 2015), which was utilised for the Retail Needs Assessment (2016) (SD39-42) and the latest forecasts within Experian Retail Planner

⁹³ [https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)
[https://www.sunderland.gov.uk/media/20883/SD-40-Sunderland-Retail-Needs-Assessment-Volume-2-2016-/pdf/SD.40_Sunderland_Retail_Needs_Assessment_Volume_2_\(2016\).pdf?m=636802956760670000](https://www.sunderland.gov.uk/media/20883/SD-40-Sunderland-Retail-Needs-Assessment-Volume-2-2016-/pdf/SD.40_Sunderland_Retail_Needs_Assessment_Volume_2_(2016).pdf?m=636802956760670000)
[https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_\(2016\).pdf?m=636802957111630000](https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_(2016).pdf?m=636802957111630000)
[https://www.sunderland.gov.uk/media/20885/SD-42-Sunderland-Retail-Needs-Assessment-Executive-Summary-and-Recommendations-2016-/pdf/SD.42_Sunderland_Retail_Needs_Assessment_-_Executive_Summary_and_Recommendations_\(2016\).pdf?m=636802957505330000](https://www.sunderland.gov.uk/media/20885/SD-42-Sunderland-Retail-Needs-Assessment-Executive-Summary-and-Recommendations-2016-/pdf/SD.42_Sunderland_Retail_Needs_Assessment_-_Executive_Summary_and_Recommendations_(2016).pdf?m=636802957505330000)

Briefing Note 15 (December 2017) were considered. In order to understand the differences in growth levels the Council indexed the growth to get a clear comparison. The results of this exercise are shown below:

SRNA Study with Experian Retail Planner Briefing Note 13 (October 2015)			SRNA Update with Experian Retail Planner Briefing Note 15 (December 2017)		
COMPARISON EXPENDITURE GROWTH RATES			COMPARISON EXPENDITURE GROWTH RATES		
Year	Annual Growth Rates (per capita)	Growth Indices (2014=100)	Year	Annual Growth Rates (per capita)	Growth Indices (2014=100)
2015		100.0	2015		100.0
2016	3.2%	103.2	2016	5.0%	105.0
2017	2.9%	106.2	2017	2.4%	107.5
2018	2.7%	109.1	2018	0.8%	108.4
2019	2.8%	112.1	2019	2.1%	110.7
2020	3.0%	115.5	2020	2.9%	113.9
2021	3.2%	119.2	2021	3.3%	117.6
2022	3.1%	122.9	2022	3.4%	121.6
2023	3.3%	126.9	2023	3.4%	125.8
2024	3.3%	131.1	2024	3.3%	129.9
2025	3.1%	135.2	2025	3.2%	134.1
2026	3.1%	139.4	2026	3.1%	138.2
2027	3.2%	143.8	2027	3.1%	142.5
2028	3.0%	148.1	2028	3.0%	146.8
2029	3.2%	152.9	2029	3.1%	151.3
2030	3.3%	157.9	2030	3.2%	156.2
2031	3.2%	163.0	2031	3.4%	161.5
2032	3.3%	168.4	2032	3.3%	166.8
2033	3.3%	173.9	2033	3.4%	172.5
2034	3.3%	179.7	2034	3.3%	178.2
2035	3.5%	185.9	2035	3.3%	184.1
Notes			Notes		
⁽¹⁾ Appendix 4a, Experian Retail Planner Briefing Note 13 (October 2015).			⁽¹⁾ Appendix 4a, Experian Retail Planner Briefing Note 15 (December 2017).		

6.197 As shown above, by the end of the plan period in 2033 the difference in the indexed level of forecast comparison goods expenditure growth would be just 0.6 which is not considered to be statistically significant.

6.198 The final input which was given further consideration was the levels of expenditure growth assigned to Special Forms of Trading (SFT). As set out below, it is noted that under the latest forecasts, set out within the Experian Retail Planner Briefing Note 15 (December

2017), the proportion of retail expenditure assigned to Special Forms of Trading is greater than that set out within the forecasts utilised for the Retail Needs Assessment (2016) (SD39-42).

SRNA

**SFT GROWTH -
ADJUSTED FOR
SALES FROM
STORES**

Year	Comparison
2015	0.117
2016	0.124
2017	0.131
2018	0.138
2019	0.144
2020	0.149
2021	0.150
2022	0.152
2023	0.151
2024	0.151
2025	0.150
2026	0.150
2027	0.149
2028	0.148
2029	0.147
2030	0.147
2031	0.146
2032	0.145
2033	0.144
2034	0.144
2035	0.143

SRNA Update

**SFT GROWTH -
ADJUSTED FOR
SALES FROM
STORES**

Year	Comparison
2015	0.122
2016	0.135
2017	0.148
2018	0.154
2019	0.159
2020	0.164
2021	0.169
2022	0.172
2023	0.174
2024	0.175
2025	0.175
2026	0.175
2027	0.176
2028	0.176
2029	0.177
2030	0.177
2031	0.178
2032	0.178
2033	0.179
2034	0.179
2035	0.180

Source

Experian Retail Planner Briefing Note 13, penultimate column, page 17

Source

Experian Retail Planner Briefing Note 15, penultimate column, page 18

- 6.199 However, the Council does not consider that the differences are of such a scale that would make a significant deviation from the recommendations of the Council's Retail Needs Assessment (2016) (SD39-42), which would justify a reduction in the amount of comparison floorspace required over the plan period.
- 6.200 Furthermore, as the Council is planning for population growth over and above the latest ONS projections, it would not be appropriate to lower the retail floorspace requirement (SD39⁹⁴). To further reinforce this point, Table 7.3 of the Retail Needs Assessment (pg

⁹⁴ [https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=63680295631360000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=63680295631360000)

111) (SD39) sets out the likely floorspace requirements which would be required under the employment led population scenario, which demonstrates a higher level of comparison retail floorspace than is being planned for through the plan.

- 6.201 The comparison retail floorspace requirement set out within the policy is based on a static retention rate with regard to existing shopping patterns. The Retail Needs Assessment did consider a two alternative scenarios (see Retail Needs Assessment 2016; Table 7.1; pg109) (SD.39), which related to a 2% decline in retention level and a 2% increase in retention level, however these were not considered to be appropriate.
- 6.202 Planning for a continued decline in retention rate was not considered to be planning positively for the future vitality of designated centres within the city. This would be inconsistent with the policies of the plan which seek to reinvigorate the Urban Core and protect and enhance the vitality and viability of our designated centres.
- 6.203 Planning for an increase in retention rate was not considered to be realistic against a backdrop of historic decline in retention rates, competition from larger centres such as the Metro Centre and Newcastle City Centre and the increase in Special Forms of Trading. Using constant retention rates was therefore considered to be the most positive and realistic scenario on which to base the requirement within the plan.

Reasonable Alternative – Quantum of growth

- 6.204 This policy identifies targets for housing, employment and retail floorspace delivery over the Plan period, all of which could theoretically be varied. However, reducing the housing target below the proposed level of 13,410 homes would result in the Council being unable to meet the city's OAHN in full, whilst reducing the employment generation or retail floorspace targets would undermine a core aim of the Plan in terms of increasing economic growth. Conversely, setting higher housing, employment or retail floorspace targets may not translate into higher levels of population or economic growth due to displacement effects and the position of Sunderland within wider regional labour markets.
- 6.205 The Council is unable to identify sufficient deliverable and developable housing sites within its SHLAA (SD.22)⁹⁵ to meet the city's OAHN in full. Housing Growth Areas have therefore been identified to provide sufficient land supply to enable the Council to meet its objectively assessed needs.
- 6.206 A reasonable alternative to the proposed spatial strategy, which would have resulted in a lower housing target, would have been to not seek to meet the Council's OAHN in full. This would have avoided the need to release strategic Housing Growth Areas from the existing Green Belt. However, this approach was not considered to be desirable as it would lead to a clear shortage of housing supply within the area during the plan period. In addition, the Council formally wrote to all neighbouring authorities (Durham, South Tyneside and Gateshead) to ask whether these authorities were able to meet some of Sunderland's housing need without developing within their own Green Belt to do so. Both Durham County Council and South Tyneside Council have responded to advise that they could not. Gateshead Council have yet to respond, but have recently adopted a plan which required Green Belt deletion to meet their own housing need. Not meeting the city's housing needs would also be likely to result in a continuation of net outward migration and population decline, which are trends which the Council wishes to address.

⁹⁵ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

6.207 A further reasonable alternative which was considered would have been to allocate the full set of housing sites required to meet the Council's OAHN within the Plan, i.e. all urban sites currently listed within the Council's SHLAA as well as the strategic and green belt release sites which are proposed for allocation. However, this would have undermined the strategic focus of the Plan and could have resulted in substantial delays in its preparation owing to the additional work required to assess many more potential sites.

Alternative case for Green Belt Boundary

6.208 As part of consultation on the Plan, it has been suggested that there are exceptional circumstances to amend the boundary to support employment growth and for other land uses including a reservoir and quarry. The Council have considered these proposals but have concluded that there is no evidence to justify amending the boundary for these uses. Table below summarises the Council position in regards to these alternative approaches. The site specific policies suggest alternative site boundaries for each sub area.

Alternative approach	Justification
Removing land from the Green Belt for a quarry	Thompsons of Prudhoe consider that the Plan has failed to amend the Green Belt boundary for other purposes other than housing. The location of Springwell Quarry 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 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 (SD.30) 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 (SD.34) 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." (see paragraph 4.56, page 25) (SD.34).
Removing Land for a Reservoir	In infrastructure terms, Northumbrian Water have not demonstrated the overall need for the reservoir, and why the location at Springwell Village (within the Green Belt) is the only suitable and appropriate option available. From the information supplied to date, it is not clear why other sites in the area would not be appropriate to use, including sites within Gateshead and South Tyneside as well as elsewhere within Sunderland. To our understanding, the reservoir would not only serve Sunderland, but also residents in South Tyneside and Gateshead. The Council therefore considers that exceptional circumstances have not been demonstrated that would support such a deletion from the Green Belt. Furthermore, the Council considers that a reservoir could be considered as an appropriate use within Green Belt, therefore the need to remove such a site from the Green Belt is considered to be unnecessary. The

site in question has been considered carefully through Green Belt Review (SD.29-SD.34)⁹⁶, and is proposed for retention based on the impact to Green Belt purpose as well as other factors (see pages 63-64 in the Stage 3 Green Belt Site Selection Report) (SD31).

Removing land for employment An additional call for sites was undertaken in 2017 as part of the draft Plan consultation. No land was put forward as part of this call for sites. The Council has sufficient land on existing employment sites to meet needs therefore Green Belt release was considered not necessary.

Effective Deliverable

6.209 The policy will be delivered through the submission and determination of planning applications. The Council will allocate specific sites through the emerging Allocations and Designations Plan to provide sufficient sites to meet the levels of growth identified within the policy. The policy will be carefully monitored and reviewed to ensure that it is delivered.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP1	Spatial Strategy	Sets out the level of growth required and the spatial strategy to deliver this	<ul style="list-style-type: none"> Significant shortfall in the number of new homes delivered compared to Policy target Significant shortfall in the number of new jobs created in key growth sectors compared to Policy target Significant shortfall in employment land developed Significant shortfall in new comparison retail 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Potential review of the strategic approach to identification of land for development Review of land allocated for development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Housing completions against the overall plan period target for 13,410 net additional homes to 2033 Housing delivery (net additions) against the plan period requirements of average 745pa net additions Number of new jobs created Land (ha) and floorspace 	<ul style="list-style-type: none"> SCC Monitoring data Nomis (ONS data) Employment Land Review

⁹⁶ https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32_Green_Belt_Assessment_-_2018_Addendum.pdf?m=636802953199630000
https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

			<p>development delivered</p> <ul style="list-style-type: none"> • Failure to deliver sufficient physical, social and environmental infrastructure • Failure to deliver the majority of development to the Existing Urban Area 		<p>(sqm) developed for B1, B2 and B8 uses</p> <ul style="list-style-type: none"> • Amount (sqm) of new comparison retail floorspace created 	
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Consistent with National Policy

6.210 Para 156 of the NPPF states that local planning authorities should set out the strategic priorities for the area, this is the purpose of Policy SP1 as well as the spatial strategy and sustainable patterns of growth. SP2 Urban Core

6.211 The Urban Core, as designated on the Policies Map, is the main administrative centre of Sunderland. It is the focus for a wide range of civic, retail, cultural and leisure functions and is also home to both campuses of the University of Sunderland. It is a highly accessible location by a range of public transport options including rail, Metro and bus services. Policy SP2 sets the strategic policy approach for the Urban Core. The strategy seeks to transform the Urban Core into a more attractive and vibrant place, a place where people gather to socialise, work, live and play. A new revitalised Urban Core will be the catalyst for the city's wider economic growth and will help Sunderland retain and attract more highly skilled workers and increase population and visitor numbers.

SP2 Urban Core

The Urban Core will be regenerated and transformed into a vibrant and distinctive area by:

1. increasing the range and type of office accommodation, prioritising this at The Vaux (Policy SS1);
2. concentrating retail development in the Primary Shopping Area, (as defined on the Policies Map) (Policy VC3);
3. supporting the development of higher and further education facilities at University Campus;
4. promoting mixed use development in the Areas of Change:
 - i. Sunnyside - residential led mixed use;
 - ii. Heritage Action Zone – heritage-led mixed use development;
 - iii. Minster Quarter – culture led mixed use;
 - iv. Holmeside – civic and commercial led mixed use; an
 - v. Stadium Village – leisure led mixed use
5. growing the leisure, tourism and cultural economy; and
6. diversifying the residential offer to create sustainable mixed communities.

Development in the Urban Core should:

- i. make improvements to connectivity and pedestrian movement in the Urban Core
- ii. provide a high quality of public realm to create attractive and usable spaces;
- iii. protect and enhance heritage assets; and
- iv. ensure high standard of design that integrates well with the existing urban fabric.

Positively Prepared

Vision and Strategic Priorities

6.212 This policy will deliver the spatial vision and strategic priorities by helping to provide an Urban Core that is revitalised and has become a destination of choice, a place for people to live, work and spend their leisure time and is entrepreneurial, a University City at the heart of the low carbon economy.

6.213 Policy SP2 will help to deliver Strategic Priorities 1, 2, 3, 4, 5, 6 and 7.

Draft Plan Comments

6.214 As set out in the consultation statement, the following issues were raised during the draft Plan consultation;

- The Urban Core closes after 5.00pm
- Is not an attractive environment
- The Urban Core should focus on housing
- The Urban Core should be prioritised for jobs
- The Urban Core needs more investment
- That the existing railway station needs public realm improvements
- The Urban Core needs a single large retail development
- The policy should encourage and facilitate entrepreneurship.
- Sunderland Civic Society is concerned that Holmeside has limited potential.
- Sunderland Green Party considers the Urban Core should encourage entrepreneurship.
- Sunderland University supports the policy approach but requests that the policy is expanded to include reference to need.
- ABP Property is concerned that business has been lost in city Urban Core due to a lack of suitable sites.
- Siglion supports policy but requests a focus on residential developments particularly at The Vaux and are concerned about the restrictive approach to A1 uses.
- M&G Real Estate considers that the Plan should restrict out of centre proposals for retail development.

How Issues Have Been Taken into Account at Publication Draft

6.215 In response to the comments raised:

- The Publication draft has been updated in the Homes chapter to reflect the University of Sunderland comments.
- The Vaux Policy refers to the mixed-use allocation including residential development.
- The Policy has not been updated to reflect need in response to University of Sunderland comments, as other policies in the Plan incorporate this.
- The Policy has not been updated to reflect M&G retails comments as this would be repetitive of national guidance and guidance in the Policy VC1.
- The Allocations and Designations Plan will allocate sites required to deliver this policy.

Publication Draft Comments

6.216 As set out in the consultation statement, the following issues were raised during Publication Draft consultation:

- A representation (PD4623) was received which was supportive of the objective of Policy SP2 to promote a leisure led mixed-use development, but was critical that this does not prejudice the future development or expansion of Sunderland Football Club. The representation expressed concern regarding parking, traffic congestion and pedestrian circulation implications of new development with an understanding that these matters will be addressed through forthcoming Stadium Village Masterplan;

- Historic England (PD91) welcomes the recognition of the Sunderland Heritage Action Zone with Policy SP2; however it is not mentioned in the supporting text. Historic England request additional text to reflect the rich historic environment within the Urban Core.

How Issues Have Been Taken into account prior to Submission

6.217 In response to the representation raised by Historic England (PD91) the Council has proposed an additional modification as set out in the Schedule of Modifications (M18).

Proposed Modifications to the Publication Draft

6.218 No modifications are proposed to the Publication Draft.

Duty to Cooperate

6.219 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy.

Sustainability Appraisal (2017)

6.220 The following table is a visual summary of the detailed assessment provided in SA Appendix (SD.12). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix C.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

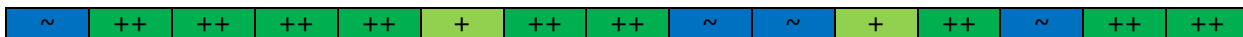
6.221 The SA (SD.12) made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA11: Air	To address the identified deficiency regarding consideration of environmental and potential flood risk impacts associated with the transport infrastructure projects supported by policy CC2–Connectivity and Transport Network it is recommended that this policy should be expanded to reference the need for these projects to accord with other relevant planning policies and to demonstrate that they would not give rise to any unacceptable environmental or amenity impacts.	All policies of the plan should be read together. This has been made clear in the introductory sections, so no need to specifically reference.

Sustainability Appraisal (2018)

6.222 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.6). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix F.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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6.223 The SA made no recommendation for changes to be made to the Publication Draft.

Justified

6.224 The Urban Core is the main administrative centre of Sunderland. It is the focus for a wide range of civic, retail, cultural and leisure functions and is home to both campuses of the University of Sunderland.

6.225 The policy sets out a strategic approach to help deliver the revitalisation of the Urban Core. It seeks to assist the delivery of the office-led strategic site allocation at the Vaux, concentrate retail development within the designated Primary Shopping Area, support the expansion of the University, grow the leisure, tourism and cultural offer and diversify the residential offer in the heart of the city.

6.226 The Vaux is a key priority site for the Council and the proposed policy is a continuation of the mixed use allocation already in place through the UDP Alteration No.2. More detailed justification for the Vaux site allocation is contained within Policy SS1.

6.227 In accordance with Paragraph 23 of the NPPF (2012; pg 7), the Council has defined the extent of its town centres and primary shopping areas based on a clear definition of primary and secondary frontages. The primary shopping area for the city centre is located within the Urban Core and should be the location where new retail development within the Urban Core is focussed. This will help to reinforce the City Centre as the principal shopping location within the city and also help to sustain and enhance its vitality and viability. The primary shopping area defined on the proposed Policies Map is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39) (Figure 8.1; pg124).

6.228 The Urban Core contains both the Chester Road and St Peter's Campuses of the University of Sunderland. The Council recognise the importance of the University to the future of the city, both in providing highly qualified graduates for the local economy and helping to stimulate economic growth. The University has identified health sciences and wellbeing, advanced manufacturing, engineering and computer software as key growth areas and the Council will support the development of new facilities at the university campuses to support the growth of the University.

6.229 A number of Areas of Change have been identified within the policy, which are closely aligned to Council priorities being delivered by the Council's Regeneration and Property Teams. Whilst not allocated exclusively for these uses, the policy seeks to identify the main uses which will be focussed within each of the Areas of Change. The Areas of Change represent a broad continuation of the Comprehensive Development Sites and Strategic Locations of Change identified within the Urban Core through UDP Alternation No.2.

6.230 A series of masterplans that have recently been prepared and/or are in the process of being prepared will provide a clear picture, across the Urban Core, of the future development envisaged within the Areas of Change, and provide detailed guidance to ensure development meets the required standards.

- 6.231 Sunnyside has been identified by the Council for residential led development. The Council published its Sunnyside Planning and Design Framework (SP.59⁹⁷) which has been guiding development within the Sunnyside area, since its identification as a Strategic Location for change within UDP Alteration No.2.
- 6.232 Sunderland's Historic High Streets Heritage Action Zone (HAZ) has been established to address the heritage and economic needs of the City Centre and Old Town's declining historic High Streets and their environs, more specifically aiming to address Heritage at Risk across the zone and to provide the catalyst to stimulate the area's wider regeneration and economic growth.
- 6.233 The Heritage Action Zone (HAZ) includes 2 entire conservation areas, the adjoining Old Sunderland and Old Sunderland Riverside Conservation Areas, and part of the adjacent Sunnyside Conservation Area, all of which are on Historic England's Heritage at Risk Register. It is focused along the Historic High Street, Fawcett Street and Church Street East, where economic decline is most evident and there is the greatest concentration of heritage assets at risk or in poor condition in the central area of the City.
- 6.234 A HAZ Partnership Team has been formed with cross-sector representation to ensure the cross-cutting socio-economic and historic environment challenges have informed the development of the HAZ Delivery Plan, and to ensure the aims and outputs of the HAZ are realistically achievable and will have a long-lasting legacy in delivering heritage-led sustainable economic growth. The HAZ Partnership comprises Sunderland City Council, Historic England, Sunderland Culture, Tyne and Wear Building Preservation Trust, The Churches Conservation Trust, and Sunderland Heritage Forum.
- 6.235 A Delivery Plan has been produced and collectively agreed by the partnership and sets out a five year programme (2017-2022) of linked projects and activities through which the aims of the HAZ will be achieved. Projects include a series of building repair and conservation projects and project development work to prioritise and define these building projects. The Policy seeks to recognise the partnership working being undertaken as part of this HAZ.
- 6.236 The Minster Quarter contains a number of key cultural venues including the Empire Theatre and the Council is committed to improving the cultural offer within the Minster Quarter. In March 2017, the Council adopted its Minster Quarter SPD (SP.61⁹⁸) which provides guidance on how the Council would like to see the Minster Quarter developed.
- 6.237 Recent improvements to the cultural offer within the Minster Quarter include the redevelopment of the former Fire Station building and the proposals for a new auditorium which are due to be commenced in 2019.
- 6.238 Holmeside represents a long-term opportunity site within the heart of the Urban Core. Whilst the development of a new City Centre Campus for Sunderland College has taken up a significant proportion of this site, there are still remaining parcels of the site which offer the opportunity for further development. The Council has identified the site for civic and commercial led mixed use development.

⁹⁷ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

⁹⁸ [https://www.sunderland.gov.uk/media/20960/SP-61-Minster-Quarter-Masterplan-Supplementary-Planning-Document-2017-/pdf/SP.61_Minster_Quarter_Masterplan_Supplementary_Planning_Document_\(2017\).pdf?m=636803150007630000](https://www.sunderland.gov.uk/media/20960/SP-61-Minster-Quarter-Masterplan-Supplementary-Planning-Document-2017-/pdf/SP.61_Minster_Quarter_Masterplan_Supplementary_Planning_Document_(2017).pdf?m=636803150007630000)

- 6.239 The Stadium Village area has seen a significant amount of change over recent years, with a focus on leisure developments including the Stadium of Light, the Aquatics Centre and most recently the Beacon of Light. The Council is in the process of preparing a Supplementary Planning Document to guide future proposals within the remainder of the Area of Change.
- 6.240 Sunderland contains a range of leisure and tourism assets which attract visitors to the city including the coastal resorts of Roker and Seaburn, the Stadium of Light and the Empire Theatre. There are also a number of events held in Sunderland ranging from the Airshow and Illuminations which are held each year, to one-off events such as the Tall Ships Race which was held in Sunderland in 2018.
- 6.241 The Sunderland Cultural Partnership has been formed to coordinate the cultural vision, promote joint planning and facilitate engagement between partners across the city. The Partnership is a collaboration led by the University of Sunderland, Sunderland City Council and the Music, Arts and Culture (MAC) Trust, with support from Arts Council England. In October 2014, the Cultural Partnership published the Sunderland Cultural Strategy (SP.60), which sets out the vision for how the Partnership will seek to improve the cultural offer within the city. The Council will seek to help deliver the Cultural Strategy by supporting existing and new cultural facilities in appropriate locations through Policy SP2.
- 6.242 The housing offer within the Urban Core is dominated by apartments. The Council is keen to encourage a wider diversity of residential uses within the Urban Core in order to help create more sustainable mixed and balanced communities. It is envisaged that more townhouses will be developed within the Urban Core to help improve the supply of family housing, particularly on some of the key regeneration sites within the area, for example the Sheepfolds area where land has been marketed for townhouse type development. Further sites in the city centre, including Vaux and Farringdon Row, will also be brought forward for family housing.
- 6.243 In accordance with the NECA Transport Manifesto (SP.68⁹⁹) and emerging Transport Plan, the Council is committed to improving accessibility to and movement through the Urban Core.
- 6.244 Key improvements will involve avoiding conflicts between pedestrians and vehicular traffic, making improvements to the physical infrastructure within the Urban Core such as Park Lane Station and the southern concourse of Sunderland Station and improving connectivity between the Urban Core and the other major centres of the UK. Policy ST1 of the Plan provides more detailed policy guidance on the Council's approach.
- 6.245 The Council is focussed on delivering improvements to the Public Realm within the Urban Core. Recent public realm works within the Urban Core include the completion of Keel Square and Phase 1 of the Investment Corridor, which involved improved public realm works to High Street West. The next stage of the Investment Corridor works will extend westwards from Keel Square to St Michaels Way.
- 6.246 The Urban Core contains a high concentration of designated and non-designated heritage assets. The Council is committed to protecting and enhancing these heritage assets by working with partners including Historic England. As mentioned earlier, a Heritage Action Zone has been created within the Urban Core, which is already bringing forward improvements to the historic environment.

⁹⁹ https://www.sunderland.gov.uk/media/21034/SP-68-NECA-Transport-Manifesto/pdf/SP.68_NECA_Transport_Manifesto.pdf?m=636808442711700000

6.247 In addition, in June 2018 the Council was awarded £1.9m from the Heritage Lottery Fund to undertake a Townscape Heritage Scheme within the Bishopwearmouth Conservation Area, which sits within the Urban Core. This five year project will provide grant assistance to owners and tenants of historic buildings, undertake improvements to the open space which forms the medieval core of the conservation area and provide a range of activities and events to promote the heritage of the area.

Effective Deliverable

- 6.248 The policy will be delivered through the submission and determination of planning applications. The Council has or is in the process of preparing masterplans/SPDs to help facilitate the delivery of each of the Areas of Change and capital resources will be provided to help fund the delivery of specific proposals, where available. The Vaux will not have a specific masterplan or SPD but has the benefit of planning permission and is being delivered by Siglion which is a joint venture partnership between the Council and the private sector.
- 6.249 Improvements to the public realm are being delivered through capital resources such as the ongoing Investment Corridor. The Heritage Action Zone and Townscape Heritage Scheme will deliver improvements to the historic environment in the short to medium term.
- 6.250 Development at the University Campuses will be delivered by the University of Sunderland.
- 6.251 Cultural development will be supported through the delivery of the Sunderland Cultural Strategy with stakeholders involved in the Sunderland Cultural Partnership, particularly the MAC Trust.
- 6.252 The Council’s emerging Movement Strategy will identify particular proposals to improve accessibility and movement through the Urban Core.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP2	Urban Core	Sets out the strategy for development within the Urban Core and the principles of development	<ul style="list-style-type: none"> Development is not brought forward as expected Failure to improve the range and type of office accommodation within the Urban Core Failure to diversify the residential offer within the Urban Core Significant amount of retail development outside of the Primary 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Qualitative/descriptive analysis of development within identified Areas of Change Amount of higher/further education facilities approved B1a office floorspace (sqm) permitted on Vaux PEA B1a office floorspace (sqm) permitted within urban core Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within the Urban Core Existing and new retail 	<ul style="list-style-type: none"> SCC Monitoring data Employment Land Review

			<p>Shopping Area</p> <ul style="list-style-type: none"> • Failure to grow the leisure, tourism and cultural economy 		<p>A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in designated primary shopping area</p> <ul style="list-style-type: none"> • Housing completions and delivery within the Urban Core 	
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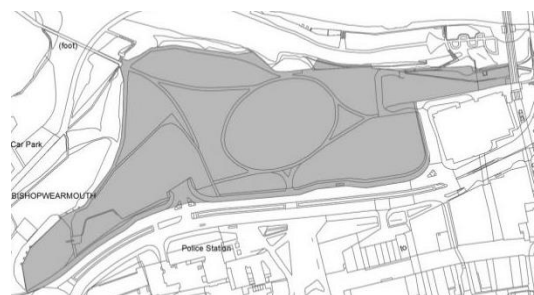
Consistent with National Policy

6.253 The Urban Core is the main centre within the City where development is to be focused as it is the most accessible and would encourage sustainable patterns of development and movement. As the purpose of the planning system is to contribute to the achievement of sustainable development then the policy is consistent with national policy.

6.254 Also the Core Planning Principles set out in the NPPF state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SS1 The Vaux

6.255 The Vaux is an opportunity to bring Grade A office space into Sunderland as there is currently very little Grade A space. The Vaux provides a huge opportunity to have a positive impact on the future of the city's economy. The North West corner of The Vaux offers an opportunity for new homes to create a truly sustainable urban neighbourhood. Policy SS1 allocates the Vaux as a strategic site.



SS1 The Vaux (5.8ha)

To create a new sustainable urban neighbourhood and a new gateway into the Urban Core, The Vaux is allocated for:

1. high density floorspace (B1a) for at least 60,000sqm;
2. a minimum of 200 new homes (C3); and
3. a hotel (C1) and small scale ancillary leisure and retail development.

Development at The Vaux should:

4. improve linkages to St Mary's Way and the rest of the Urban Core; and
5. provide new public space, active streets and maximise movement for pedestrians.

Positively Prepared Vision and Strategic Priorities

6.256 This policy will deliver the spatial vision and strategic priorities by helping revitalise the Urban Core and ensure that it becomes a destination of choice and to help ensure that the city is vibrant and growing with excellent access to a range of job opportunities.

6.257 Policy SS2 will help to deliver Strategic Priorities 1, 2 and 4.

Draft Plan Comments

6.258 As set out in the consultation statement, the following issues were raised during the draft Plan consultation;

- Residents object to additional offices when there are vacant offices in the Urban Core.
- CPRE supports the policy.

- Siglion request the policy enables mix use development in accordance with the planning application.
- Highway England request quantum of development to be included in the policy.

How Issues Have Been Taken into Account at Publication Draft

6.259 The policy was updated to include the mix of uses on the Vaux site and set the quantum of development.

Publication Draft Comments

6.260 As set out in the consultation statement, the following issues were raised during Publication Draft consultation;

- The policy was supported by South Tyneside Council, CPRE North East and Historic England (PD4363, PD1383 & PD93). CPRE North East recommended that house types should be mentioned for the Vaux site, as happens with other policies in the plan.
- Highways England suggested further modelling work is needed on the Strategic Road Network (PD4840).
- Siglion suggested modifications to the policy to ensure its flexibility for a wider range of uses (PD3060).

How Issues Have Been Taken into account prior to Submission

6.261 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council considers that the policy is consistent with the planning permission which is currently being implemented on site.

Proposed Modifications to the Publication Draft

6.262 A minor modification has been proposed to the policy to refer to St Mary's Boulevard rather than St Mary's Way, to correct the street name.

Duty to Cooperate

6.263 No duty to cooperate issues identified. South Tyneside Council support the policy.

Sustainability Appraisal (2018)

6.264 The policy was not subject to detailed assessment as part of the SA (SD.6), as it was scoped out for the reasons identified in Appendix F of the SA.

Justified

6.265 The policy seeks to support delivery of the Vaux, which is a key strategic development site within the Urban Core.

6.266 The Council recognise that there is a lack of good quality Grade A Office floorspace within the Urban Core (Sunderland Employment Land Review (SD.37¹⁰⁰); Para 4.7; pg29) as the vast majority of office development over recent decades has been focussed within out-of-centre business parks, which benefitted from Enterprise Zone status (Sunderland Employment Land Review (SD.37); Paras 5.7-5.9, pg35-36). Helping to create a new office hub within the Urban Core will help to revitalise the area and improve footfall helping to support a wider range of shops and services within the City Centre.

6.267 Following the closure of the Vaux Brewery on the site in 1999, the Council has sought the redevelopment of this prime site on the edge of the city centre with views overlooking the River Wear. In September 2005, the Council approved plans by Sunderland Arc for office-led

¹⁰⁰ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

mixed use regeneration on the site comprising of 500,000sq ft of office space, 1,000 apartments, a new public square and new Wear footbridge (Reference 04/02704/FUL).

6.268 Subsequently, the site was allocated for office-led mixed use development through Policy SA55A.2 of the existing adopted development plan for central Sunderland (UDP Alteration No.2 – adopted September 2007).

6.269 Following on from the allocation, in August 2016, the Council approved a hybrid planning application for office-led mixed use regeneration on the site (Reference 15/02557/HY4). This comprised of full permission for the first phase of the site comprising of an office building with ancillary leisure, food and drink, and retail uses and outline permission for the remaining elements including further office development, residential use, a hotel, car parking and ancillary retail use. The allocation is consistent with the planning permission which has been secured on the site and represents a continuation of the policy allocation within UDP Alteration No.2.

6.270 The redevelopment of the Vaux site for office-led mixed use development is supported by the Council’s Economic Masterplan (SP.30¹⁰¹), the Economic Leadership Boards 3,6,9 Vision (SP.31) and also formed a part of the Sunderland City Deal in partnership with South Tyneside Council agreed with Government in June 2014. Development of the site is underway, with the first office building nearing completion.

Effective Deliverable

6.271 The site will be delivered through the continued delivery of the permitted scheme. The site is being delivered by Siglion which is a joint venture partnership between Sunderland City Council and the private sector. The Council also recently signalled its intention to move its Civic Centre from its current location on Burdon Road to the Vaux.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS1	The Vaux	Sets out the mix and principles of development expected on the Vaux Site	<ul style="list-style-type: none"> Significant shortfall in the amount of B1a floorspace delivered compared to Policy target Significant shortfall in the amount of new homes delivered compared to Policy target Failure to deliver a hotel on the 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> B1a floorspace (sqm) permitted/developed on site Housing completions on Vaux site Delivery of hotel on site 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications Employment Land Review Retail Health & Capacity Studies Retail Needs Assessment

¹⁰¹ https://www.sunderland.gov.uk/media/20930/SP-30-Sunderland-Economic-Masterplan/pdf/SP.30_Sunderland_Economic_Masterplan.pdf?m=636803131897070000

Consistent with National Policy

6.272 The core planning principles set out in Paragraph 17 of the NPPF include the effective reuse of land that has been previously developed and promoting mixed use development and encouraging multiple benefits from the use of land in urban areas. The Vaux site is a previously developed site within the Urban Core which is promoted in the policy for mixed use development therefore the policy is consistent with the NPPF.

Consistent with National Policy

6.273 The Urban Core is the main centre within the City where development is to be focused as it is the most accessible and would encourage sustainable patterns of development and movement. As the purpose of the planning system is to contribute to the achievement of sustainable development then the policy is consistent with national policy.

6.274 Also the Core Planning Principles set out in the NPPF state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SP3 Washington

6.275 Washington is a highly sustainable location, with good transport links to the City Centre, Durham, Gateshead, and Newcastle. The Washington sub-area has also been a principal location for employment growth within the city over recent years and is forecast to continue to be so with the development of the IAMP and the ELR (SD.37¹⁰²) identifying Washington as having the strongest employment market within the city. It is an inherently sustainable location.

6.276 The purpose of Policy SP3 is to establish the spatial strategy for the future development of Washington.

SP3 Washington

Washington will continue to thrive as a sustainable mixed community and a driver of economic growth for Sunderland.

In order to achieve this:

1. economic growth will be focused in identified Employment Areas (policies EG1 and EG2) and at the IAMP;
2. Washington Town Centre will be the focus for office, retail and Main Town Uses. Any development within the centre should enhance its vitality and viability;
3. South West Springwell, East Springwell, North of High Usworth, North of Usworth Hall, Fatfield and Rickleton (Policy SS2) are allocated as Housing Growth Areas;
4. land will be safeguarded at East Washington and South of Springwell (Policy SS3); and
5. existing Travelling Showpeople sites will be safeguarded (Policy H4).

¹⁰² [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)
[https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_\(2016\).pdf?m=636803862875470000](https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_(2016).pdf?m=636803862875470000)

Positively Prepared

Vision and Strategic Priorities

6.277 This policy will deliver the spatial vision by identifying employment land to ensure that Washington is open to business and is responsive to the changing needs and demands of our growing economy; provides access to a range of job opportunities for all ages, abilities and skills; has a vibrant town centre; and offering a mix of good quality housing.

6.278 Policy SP3 will help to deliver Strategic Priorities 1, 2, 3, 4, 5, 6 and 8.

Draft Plan Comments

6.279 This is a new policy, so no previous comments have been received.

How Issues Have Been Taken into Account at Publication Draft

6.280 This is a new policy, so no previous comments have been received.

Publication Draft Comments

6.281 As set out in the consultation statement, the following issues were raised during Publication Draft consultation

- A significant number of residents object to the policy on the following grounds:
 - Brownfield sites have not been considered before Green Belt
 - Concerns over merging of Springwell Village and Washington
 - Impact on infrastructure including schools, GPs, road network etc.
 - Impact on air quality
 - Impact of industrial expansion of Washington on quality of life.
- Springwell Village Residents Association object to the policy. Concerns about the methodology used for the Green Belt Assessment, removal of a defensible Green Belt boundary, that more homes would be built, impact on Bowes Railway, impact on road network, Green Infrastructure corridor, landscape and views (PD4966)
- Sunderland Civic Society concerned that the policy has no justification and will merge Sunderland and Washington. Housing requirement is over ambitious, will undermine the purpose of the Green Belt and separateness of Springwell Village (PD767, PD1036 & PD1161).
- CPRE North East object on the grounds that no exceptional circumstances have been demonstrated, the OAN is not consistent with the standard methodology, it would result in a weaker Green Belt boundary and does not take account of a large brownfield site at Pallion (PD1277).
- Barratt David Wilson Homes and Hellens Group support the policy. However, Barratt David Wilson Homes would like the safeguarded land to the east of Washington to be allocated for development (PD1609, PD5269 & PD241)
- Story Homes broadly support the policy, but would like larger allocations for sites HGA2 and HGA4 (PD5562). Bellway Homes would like a site at East House Farm to be safeguarded (PD1897).
- Mr. Hutchinson (landowner) would like an additional site allocated at Glebe House Farm (PD2013).
- Sport England object to the development of site HGA6 until an up-to-date Playing Pitch Assessment shows it as being surplus to development. Sport England acknowledges the emerging Park Life programme may render the site surplus to requirement (PD4475).
- M & G Real Estate support the growth proposed but are concerned that development which may affect deliverability is resisted in advance of the Allocations and Designations Plan (PD3603).
- The Central Gospel Hall Trust and Sunderland City Council's (landowners) support the policy (PD146 PD3376).

- Thompsons of Prudhoe are concerned that the plan only proposed to amend Green Belt boundaries for housing, which could limit development at Springwell Quarry (PD192).

How Issues Have Been Taken into account prior to Submission

- 6.282 In response to the representations raised by Sport England (PD4475), the Council has proposed minor modifications as set out in the Schedule of Modifications.
- 6.283 The Council has taken into consideration the remaining representations and are not proposing to make any further modifications to this policy. The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper.
- 6.284 The Council has carefully considered the alternative sites put forward through the Green Belt Assessment and Green Belt Boundary Review; however these have been discounted for various reasons as set out within the evidence base. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.
- 6.285 The Council has prepared an Infrastructure Delivery Plan, which has been informed by a Transport Assessment and Education Plan. This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

Proposed Modifications to the Publication Draft

- 11.1 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
Figure 15	Replaced map, amended key (see Appendix 1)	For clarity

Duty to Cooperate

- 6.286 No duty to cooperate issues identified.

Sustainability Appraisal (2017)

- 6.287 This is a new policy and so was not assessed as part of the Sustainability Appraisal (SA) (2017) (SD.12¹⁰³).

Sustainability Appraisal (2018)

- 6.288 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA (SD6¹⁰⁴). However the following recommendations were made for policy enhancements. The Council's response to these recommendations is set out below:

Recommendation	SCC Response
The inclusion of a minimum number of units to be allocated in the Washington Area through the future A&D Plan should be deleted from this policy, as this	Recommendation agreed and implemented.

¹⁰³ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

¹⁰⁴ https://www.sunderland.gov.uk/media/20852/SD-6-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-Non-Technical-Summary-2018-/pdf/SD.6_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_Non-Technical_Summ.pdf?m=636802912395830000

effectively sets a local housing target without it having been subject to capacity testing or SA. If a local housing target for the A&D Plan is established through the CSDP, this could affect future decisions regarding the acceptability of allocating specific sites within the A&D Plan.

Justified

- 6.289 The policy provides an overarching spatial strategy for the sustainable growth of the Washington sub-area. Washington is a key driver for economic growth in the city and includes the International Advanced Manufacturing Park (IAMP) which has been allocated for automotive and advanced manufacturing uses through the adopted IAMP Area Action Plan (AAP)(SP.9¹⁰⁵). The IAMP is considered to be a key driver of growth within the city and wider north east region and the AAP allocated 150 hectares of land for development to the north of existing Nissan site. The AAP was prepared jointly with South Tyneside Council as the site is partly located within their administrative area.
- 6.290 In addition to the IAMP, Washington also includes a range of other existing employment sites (13 in total). Due to the accessibility of Washington from the Strategic Road Network, located between the A1 and A19, it is a popular destination for businesses, particularly those in storage and distribution uses. Appendix 6 of the Sunderland Employment Land Review (2016)(SD.37¹⁰⁶) indicates past take-up of employment land within the city over the period from 2000-2014 and demonstrates the strong demand for employment land within Washington. It is anticipated that the strong demand for employment land in Washington will continue within the throughout the plan period (Sunderland Employment Land Review; Para 8.8; pg92).
- 6.291 Whilst the majority of the existing employment areas are already developed, there are some opportunities for infill development within existing industrial estates. Plots at Hillthorn Farm and Turbine Business Park have also recently been serviced opening these areas up to industrial development. Due to the strong demand for employment uses in the Washington subarea the Council will continue to safeguard land for B1, B2 and B8 use on these existing employment areas as Primary and Key Employment Areas through Policies EG1 and EG2 of the Plan. The areas safeguarded are broadly consistent with the recommendations set out within Appendix 3 of the Sunderland Employment Land Review (2016)(SD.37¹⁰⁷).
- 6.292 Washington Town Centre provides a wide range of shops, services, leisure and community facilities to the residents of Washington. It comprises of the Galleries shopping centre and Galleries Retail Park which include a range of national retailers and also a range of leisure uses such as a leisure centre, bingo hall, ten pin bowling alley and library. Due to its development as a New Town, Washington Town Centre occupies a central location within the town and is highly accessible via a number of bus services. As the principal retail location within Washington, as set out in the retail hierarchy in Policy VC1, it should continue to be the focus for Main Town Centre Uses, including offices and retail development.

¹⁰⁵ [https://www.sunderland.gov.uk/media/21025/SD-9-Schedule-of-Representations-to-Publication-Draft-CSDP-2018-/pdf/SD.9_Schedule_of_Representations_to_Publication_Draft_CSDP_\(2018\).pdf?m=636808427304730000](https://www.sunderland.gov.uk/media/21025/SD-9-Schedule-of-Representations-to-Publication-Draft-CSDP-2018-/pdf/SD.9_Schedule_of_Representations_to_Publication_Draft_CSDP_(2018).pdf?m=636808427304730000)

¹⁰⁶ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

¹⁰⁷ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

- 6.293 Washington has a limited amount of land available for housing development. Without the allocation of the proposed HGA sites in Washington, the amount of residential development proposed through the SHLAA (SD.22¹⁰⁸) amounts to just 778 dwellings, or 7% of the city total. Given that household size is decreasing, there is potential for the long-term viability of local services and facilities to be affected. To address housing supply in Washington, the Council consider there are exceptional circumstances to justify amending the Green Belt Boundary to deliver additional housing development. Whilst 6 of the 11 HGA sites are located within Washington, the scale of residential development will still remain lower than other areas of the city.
- 6.294 The scale of development proposed at Springwell Village, Rickleton, Fatfield and at Usworth is not considered to unduly alter the village/area character. Springwell Village is physically separated from both Washington and Gateshead and consists of approximately 1,000 homes. The two HGA sites proposed on the edge of the village will alter the shape of the village boundary, but the scale of development proposed (consisting of approximately 120 dwellings in total) is not considered to be such that the village will be dramatically altered. The village itself has witnessed gradual extensions over time (since its origins in the 1800's), with significant post-war extensions occurring to the south-west and to the north of the village.
- 6.295 The other four sites lie within or on the edge of the main built-up area of Washington- it is put forward that their impact to local area character can be suitably mitigated- the sites already tend to be well screened from neighbouring areas.

Reasonable Alternatives

- 6.296 The proposed allocation of Housing Growth Areas within the Washington area has followed a Green Belt Review and site selection process (SD.29-32). This concluded that the proposed allocations can and should be released from the Green Belt to contribute to meeting Sunderland's OAHN. Failure to release these sites would either result in Sunderland's OAHN not being met or would require alternative and potentially less suitable and sustainable areas of Green Belt land to be released for housing. There is a strong demand for employment uses within the Washington sub-area, therefore it is important to safeguard these for future employment uses. No reasonable alternatives to this policy can therefore be identified.

Effective Deliverable

- 6.297 The policy will be delivered through the submission and determination of planning applications.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
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¹⁰⁸ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)
[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

SP3	Washington	Sets out the spatial strategy for Washington	<ul style="list-style-type: none"> • Failure to focus economic growth in identified Employment Areas and the IAMP • A significant amount of out-of-centre office, retail and other Main Town Use development • Failure to deliver new homes within identified Housing Growth Areas 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the Plan/Policy • Potential review of the strategic approach to identification of land for development 	<ul style="list-style-type: none"> • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas • Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within designated town centre • Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in designated primary shopping areas of town centre • Percentage of primary frontages in non-A1 use in designated town centre • Length of primary frontages in A1, A2, A3 and A5 retail uses in designated town centre • Housing completions and delivery within identified Housing Growth Areas • Plots created on allocated travelling showpeople sites 	<ul style="list-style-type: none"> • SCC Monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment
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Consistent with National Policy

6.298 The Core Planning Principles set out in Paragraph 17 of the NPPF state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SS2 Washington Housing Growth Areas

6.299 The policy proposes to allocate six Housing Growth Areas to support the sustainable growth of Washington over the Plan period.

SS2 Washington Housing Growth Areas

Development of Washington Housing Growth Areas should:

1. provide a mix of housing types with a focus on family homes;
2. address impacts and make provision or contributions towards education provision and healthcare;
3. enhance access to local facilities and services, and

HGA1 South West Springwell should:

- i. deliver approximately 60 new homes;
- ii. create a new defensible Green Belt boundary to the west and south of the site;
- iii. ensure that the open aspect to Bowes Railway Scheduled Ancient Monument is retained;
- iv. maintain wildlife and green infrastructure corridors and limit any impact on the area's landscape character by providing a greenspace buffer along the western edge of the site;
- v. be of high architectural quality to protect long distance views to the southern edge of the development from the south;
- vi. be designed to respect the village character and to existing residential development on the northern and eastern edges;
- vii. provide pedestrian/cycleway connections from the western edge of the site and connect to the existing public Right of Way to the north; and
- viii. include vehicle access from the south to connect to Mount Lane and improve other junctions as necessary.

HGA2 East Springwell should:

- i. deliver approximately 60 new homes;
- ii. create a new defensible Green Belt boundary to the south of the site;
- iii. maintain a wildlife and green infrastructure corridor running north-south and limit any impact on the area's landscape character through sensitive boundary treatment;
- iv. be of high architectural quality to protect long distance views to the southern edge of the development from the south;
- v. be designed to respect the village character and to existing residential development on the northern and western edges;
- vi. include additional buffers as necessary to address noise implications from the A194(M) directly bordering the eastern edge of the site
- vii. mitigate the impacts of the natural swale and associated surface water flooding located along the southern edge of the site and provide easements for public sewers as necessary;
- viii. retain all healthy trees and hedgerows and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality; and
- ix. include vehicle access from Peareth Hall Road, and improve other junctions as necessary.

HGA3 North of High Usworth should:

- i. deliver approximately 45 new homes;
- ii. create a new defensible Green Belt boundary to the north
- iii. maintain a wildlife and green infrastructure corridor running west-east and limit any impact on the area's landscape character;
- iv. retain existing screening of the site from the north and west, including any additional buffers and acoustic barriers as necessary to address noise implications from the A194(M);
- v. retain all healthy trees and hedgerows and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality;
- vi. retain as undeveloped the southern edge of the site to provide amenity space and as a potential location for SuDS; and
- vii. be of high architectural quality and be designed with consideration of the village character to the south.

HGA4 North of Usworth Hall should:

- i. deliver approximately 205 new homes
- ii. create a new defensible Green Belt boundary to the north and west;
- iii. provide greenspace/green infrastructure within the site;
- iv. limit impact on the area's landscape character to the north and west through sensitive boundary

- v. treatment, to minimise impact on priority species/habitat and to address surface water flooding; incorporate greenspace/green infrastructure to the east of the site to provide a buffer to the former Leamside line, address flooding associated with the Usworth Burn and to minimise impact on priority species and protected habitats;
- vi. provide an area of greenspaces along the southern edge to form a sewer easement and to protect/enhance an existing Right of Way;
- vii. be of high architectural quality along the northern edge of the site to protect long distance views and to reflect the local vernacular;
- viii. provide improved public transport connections to the site, and provide pedestrian/cycleway connections to the west and east of the site and connect to existing public rights of way; and
- ix. include appropriate vehicle access from Stephenson Road, and provide mitigation as necessary to the road junctions at Heworth Road, Rutherford Road, the A195 and A184.

HGA5 Fatfield should:

- i. deliver approximately 30 new homes;
- ii. maintain wildlife and green infrastructure corridors along the River Wear and Princess Anne Park and limit any impact on the area's landscape character;
- iii. retain the majority of existing tree belts and screening of the site, and provide additional buffers as necessary to address noise from the A182;
- iv. incorporate greenspace on site and support greenspace improvements in the local area to compensate for area greenspace loss and to help minimise the impact on priority species/protected habitat in the locality;
- v. be of high architectural quality to reflect the local vernacular, providing a unique community within a woodland setting;
- vi. use archaeological assessments to enable the protection and depiction of the area's industrial history;
- vii. include vehicle access from existing highways linking to Bonemill Lane;
- viii. provide pedestrian/cycleway; and
- ix. connections through the site, linking to neighbouring routes.

HGA6 Rickleton should:

- i. deliver approximately 200 new homes;
- ii. maintain wildlife and green infrastructure corridors to the south;
- iii. provide a greenspace buffer to minimise impact on the adjacent Grade II Lambton Castle Registered Park and Garden and priority species and protected habitat in the locality;
- iv. retain all healthy trees and hedgerows and create a central greenspace into the site that will upgrade the existing scrub land and mature natural features;
- v. provide greenspace improvements to Rickleton Park to compensate for the greenspace loss;
- vi. be of high architectural quality and designed with consideration to the village character on the northern and eastern edges;
- vii. provide pedestrian connections from the site westwards and northwards to Bonemill Lane and to connect to the existing public Right of Way on the north eastern boundary; and
- viii. include vehicle access from Bramhall Drive, and provide mitigation as necessary to the road junctions at Bonemill Lane, Picktree Lane, A183, A1(M) and A182.

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.

Positively Prepared Vision and Strategic Priorities

6.300 This policy will deliver the spatial vision by offering residents the opportunity to live in sustainable communities accommodating all ages and abilities; and offering good quality housing of the types, sizes and tenures to meet the needs of existing and future communities.

6.301 Policy SS2 will help to deliver Strategic Priorities 1, 2 and 4.

Draft Plan Comments

6.302 As set out in the consultation statement, the following issues were raised during the Draft Plan consultation:

HRS1 – North of Mount Lane

- Hellens support the inclusion of the site in the Plan but consider the site should be increased.
- Development should ensure the significance of the designated Bowes Railway SAM is both sustained and enhanced
- Development would narrow the strategic gap between Springwell and Eighton Banks in Gateshead
- Increase in traffic and residents would have a detrimental impact on village character
- The proposed housing mix does not provide for the ageing population and there is no need for executive homes in the area
- Questions viability
- Further loss of Green Belt when the proposed reservoir is constructed to the south
- Access to the site is poor
- Impact on sewers that cross the site
- Detrimental impact on adjacent businesses

HRS2 – Peareth Hall Farm and Gospel Hall Trust

- Peareth Hall is mislabelled as Usworth Hall in the Plan, SA and SLR. Constraints fail to mention their significance, only requiring development to respect their setting
- Access to the site is difficult from Peareth Hall Road
- Development would narrow the strategic gap between Springwell and Washington
- An increase in traffic and number of residents would have a detrimental impact on village character
- The proposed housing mix does not provide for an ageing population and there is no need for executive homes
- Questions viability
- Increased noise
- Impact on sewers that cross the site

HRS3 – Land at Stoney Lane

Story Homes support the allocation of this site. However they consider the boundary and capacity of the site should be increased. They also consider that the Council should safeguard other areas across the city. They expect the site could deliver 140 units. The Developers consider that this development would widen housing choice, improve vitality of schools and services and provide new open space.

There was some support for the development of the site however the following comments were made by local residents and stakeholders and are specific to the site:

- Development would narrow the strategic gap between Springwell and Washington
- The increase in traffic and number of residents will have a detrimental impact on the village character
- The proposed housing mix does not provide for an ageing population and there is no need for executive homes
- Questions viability
- Access to the site is dangerous
- The site floods and sewers run across it
- Increased noise.

HRS4 – George Washington Golf Course

Barratt Homes are supportive of the site being included in the Plan but would like to see it extend to increase the capacity.

The following comments were made by the local residents and stakeholders and are specific to the site:

- Development would narrow the strategic gap between Springwell and Washington
- The increase in traffic and number of residents will have a detrimental impact on the village character
- The proposed housing mix does not provide for an ageing population
- Questions viability.

HRS5 – West of Waterloo Road, Usworth

Story Homes support the allocation of the site however they would like the Council to consider a larger area of land.

The following comments were made by local residents and stakeholders and are specific to the site:

- Should be reference made to the need to sustain and enhance the significance of the Grade II Usworth Hall
- Development would narrow the strategic gap between Washington and Gateshead
- The site has drainage issues.

HRS6 - James Steel Park, Fatfield

The following comments were made by local residents and stakeholders and are specific to the site:

- Development would cut off access to the river from woodland
- Potential impact on the adjacent designations
- Loss of playing pitches
- The site has flooding issues
- Development would leave two tongues of Green Belt without any real meaning
- Detrimental impact of the River Wear green infrastructure corridor
- There is a legal covenant restricting development of the site
- Pressure would be put on neighbouring sites to be developed

HRS7 - Southern Playing Fields, Rickleton

The following comments were made by local residents and stakeholders and are specific to the site:

- There is no mention of the site being directly adjacent to Grade II Lambton Castle Registered Park and Garden
- Loss of playing pitches
- Development would change character of the area
- Lack of public transport to and from the area
- Impact on adjacent designations
- Development would allow pollutants to enter the local water source as an underground watercourse crosses the site
- Site is a former landfill site and former pit heads
- Concern over lack of affordable housing on the site
- There is a legal covenant restricting the development of the site
- Increased traffic.

HRS8 – Glebe House Farm

- Concern was raised by nearby businesses over the use of the site for housing and that it is not an appropriate use for the site given their operations in close proximity. The adjacent businesses are looking to increase their operations which would increase the number of HGVs in the area.

How Issues Have Been Taken into Account at Publication Draft

In response to individual proposed housing release sites:

HRS1 – North of Mount Lane

- The impact to village character affects the south west of the village. Sensitive site design will retain open views and the impact can be minimised and appropriately mitigated for.
- Family housing is now proposed as opposed to executive housing, as well as a requirement to provide 15% affordable housing. The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- The gap to the west of Springwell Village will be narrowed very slightly in relation to Eighton Banks but not towards the wider Gateshead area.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.
- 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 noise that would be generated during the construction of the site would be temporary and hours of work can be controlled by condition on the planning application. Once complete the development is not expected to generate any more noise than the residential dwellings that already exist.
- Primary schools within Springwell Village and Usworth are within catchment distances. If neither school has capacity at the time that the site comes forward and a contribution is required from the developer for further provision then this will be sought through a Section 106 agreement. Access to doctor's surgeries is an ongoing national problem and further advice from NHS will be sought.
- A Phase 1 Habitat Survey has been prepared to determine the species that are present and it is considered that suitable mitigation can be put in place. Site will be required to retain trees and hedgerows.
- The area in question is within private ownership. Land around Springwell Village is not used as a formal or informal play area, therefore has not been included in the city's Green space Audit which states that Springwell has above average green space in terms of both quality and quantity.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement has been prepared. The recommendations of which will be brought forward as part of the development.
- The developer has proposed that the area of the site is increased to provide more dwellings on the site. However, the Council considers that the additional land put forward has a detrimental impact on the landscape and setting of the village. It is noted that any significant additional development in this area poses a further burden on local infrastructure, such as the existing network of narrow roads and the limits to local primary school capacity. As such, the extended area for development is not proposed.
- Concerns were raised over the impact that the additional houses would have on businesses, however the Council consider that it could potentially be beneficial to many, as their customer base will increase. The impact to Thompson's operations is noted and has been considered in detail- Site HGA1 is much smaller in size than that submitted by the developer and as such the impact on housing from Thompson's is considered to be no worse than with existing properties in the village.
- Site options have not been supported that would significantly impact on the SAM. The site is distanced from the railway and has negligible effect on the open setting to the railway alignment.

HRS2 – Peareth Hall Farm and Gospel Hall Trust

- The site has been removed as a proposed allocation.

HRS3 – Land at Stoney Lane

- The impact to village character affects the east of the village. Development is limited to the 'bowl' adjacent to Peareth Hall Road which limits impact to an extent, though some impact is unavoidable. By contrast, the omitted land along Stoney Lane is at grade and is considered to have a significant impact with existing properties. Sensitive site design will retain open views and the impact can be minimised and appropriately mitigated for.
- Family housing is now proposed as opposed to executive housing, as well as a requirement to provide 15% affordable housing. The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.
- The gap to the east of Springwell Village is already compromised at Peareth Hall Road, so the corridor is viewed as incomplete. A tree buffer alongside the A194(M) will be retained.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- The site would need to consider flood risk in light of CSDP policy, and it is considered that surface water flood risk can be mitigated for. A number of public sewers cross the site and would need to be considered appropriately within the scheme design.
- 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 noise that would be generated during the construction of the site would be temporary and hours of work can be controlled by condition on the planning application. Once complete the development is not expected to generate any more noise than the residential dwellings that already exist. Concerns were also raised over the noise that is generated by the A194(M) however appropriate mitigation can be put in place.
- Primary schools within Springwell Village and Usworth are within catchment distances. If neither school has capacity at the time that the site comes forward and a contribution is required from the developer for further provision then this will be sought through a Section 106 agreement. Access to doctor's surgeries is an ongoing national problem and further advice from NHS will be sought.
- The area in question is within private ownership. Land around Springwell Village is not used as a formal or informal play area, therefore has not been included in the city's Green space Audit which states that Springwell has above average green space in terms of both quality and quantity.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement has been prepared. The recommendations of which will be brought forward as part of the development.
- The developer has proposed that the area of the site is increased to provide more dwellings on the sites. However, the Council considers that the additional land put forward has a detrimental impact on the landscape and setting of the village. It is noted that any significant additional development in this area poses a further burden on local infrastructure, such as the existing network of narrow roads and the limits to local primary school capacity. As such, the extended area for development is not proposed.
- Concerns were raised over the impact that the additional houses would have on businesses, however the Council consider that it could potentially be beneficial to many, as their customer base will increase.

HRS4 – George Washington Golf Course

- The impact to the village character of High Usworth would be marginal, especially given how well the site is already screened.

- Family housing is now proposed as opposed to executive housing, as well as a requirement to provide 15% affordable housing. The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- The gap between Washington and Gateshead is not impacted upon from this site.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- 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 noise that would be generated during the construction of the site would be temporary and hours of work can be controlled by condition on the planning application. Once complete the development is not expected to generate any more noise than the residential dwellings that already exist. Concerns were also raised over the noise that is generated by the A194(M) however appropriate mitigation can be put in place.
- Primary schools within Springwell Village and Usworth are within catchment distances. If neither school has capacity at the time that the site comes forward and a contribution is required from the developer for further provision then this will be sought through a Section 106 agreement. Access to doctors surgeries is an ongoing national problem and further advice from NHS will be sought.
- The area in question is within private ownership. The greenspace at the pitch & putt course is shown on the Greenspace Audit but will not have an impact on the main golf course.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement has been prepared. The recommendations of which will be brought forward as part of the development.
- Concerns were raised over the impact that the additional houses would have on businesses, however the Council considers that it could potentially be beneficial to many, as their customer base will increase.

HRS5 – West of Waterloo Road, Usworth

- A Phase 1 Habitat Survey has been prepared to determine the species that are present and it is considered that suitable mitigation can be put in place. Scheme design will need to ensure that impact to the wildlife corridor to the north is minimised.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement have been prepared. The recommendations of which will be brought forward as part of the development.
- A Transport Assessment has also been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment will also ensure that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot and bicycle as well.
- Further work demonstrates that appropriate mitigation can be carried out to the natural swale that exists to the north west of the site. The developer has avoided the area that is affected by Flood Zone 2 and 3 to the south east of the site and is proposing an easement with regards to the public sewer that affects the site.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.

HRS6 - James Steel Park, Fatfield

- 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 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 Green Belt Boundary Review has been prepared and the Green Belt boundary is recommended to follow the River Wear to the Chartershaugh Bridge.
- If local primary school do not have capacity at the time that the site comes forward and a contribution is required from the developer for further provision then this will be sought through a Section 106 agreement. There is scope in the locality to bring a former school back into school use. Access to doctor's surgeries is an ongoing national problem and further advice from NHS will be sought.
- A Transport Assessment has been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot and bicycle as well. The report will also consider the potential impact of noise and vibration from the A182.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement have been prepared. The recommendations of which will be brought forward as part of the development.
- With regards to flooding the development will be set back from the river and will not be effected by Flood Zones 2 and 3. The site design will also fully address flood mitigation needs and adhere to CSDP policies.
- A Phase 1 Habitat Survey has been prepared to determine the species that are present and it is considered that suitable mitigation can be put in place. As mentioned above the woodland would remain in place and the overall impact on the Green Infrastructure is not considered to be high given the scale of green space existing in the area.
- Some local residents questioned whether the site can actually be built on as they believed that there was a covenant in place that meant that the land could not be built on. This has been investigated and development of the land can go ahead.
- The site would not be brought forward for 100% executive housing, and would seek larger family homes as well as a requirement to provide 15% affordable housing.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.

HRS7 - Southern Playing Fields, Rickleton

- The Rickleton/Harraton area has a very high proportion of greenspace (50% above the city average), which equates to over 15ha of surplus according to the 2012 Greenspace Audit. 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 E9 would allow for a contribution to be made to enhance nearby Rickleton Park to help compensate for the area loss.
- If the local primary school does not have capacity at the time that the site comes forward and a contribution is required from the developer for further provision then this will be sought through a Section 106 agreement. There is scope in the locality to bring a former school back into school use. Access to doctor's surgeries is an ongoing national problem and further advice from NHS will be sought.
- A Transport Assessment has been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars

but for people on foot, bicycle and public transport as well. It is noted that the site is between 400-800m from Rickleton village centre, which is served by a regular bus link.

- The site is affected by surface water flooding and the initial scheme design has considered how this can be treated through the use of greenspace and SUDS. The final site design will fully address flood mitigation needs and adhere to CSDP policy.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement have been prepared. The recommendations of which will be brought forward as part of the development. Further investigations have been undertaken and have considered the historic mining and landfill on the site.
- The site would not be brought forward for 100% executive housing, and would seek larger family homes as well as a requirement to provide 15% affordable housing.
- Further investigation has taken place regarding the covenant on the site and the situation has been clarified and the site is available for development.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.

HRS8 – Glebe House Farm

- This site has now been removed as a proposed allocation.
- The main concern raised regarding this site was the impact that the development would have on the character of the area and the loss of open space. However as the land is privately owned there would be no loss of amenity green space as it is not used by the public and sensitive design can enable the site to blend with the local landscape and enable suitable buffers to Herrington Burn and Herrington Country Park.
- A Transport Assessment has also been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot, bicycle and public transport as well.
- The main service impact foreseen is in relation to school capacity. A contribution will be required from the developer which will be sought through a Section 106 agreement. There is scope in the locality to create a new school. Access to doctors surgeries is an ongoing national problem and further advice from NHS will be sought.
- A number of studies have been carried out on the site including a Phase 1 Habitat Survey, visual impact assessment, ground investigations. The findings and recommendations of these studies will be implemented as the site comes forward.
- Family housing is now proposed as opposed to executive housing, as well as a requirement to provide 15% affordable housing. The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the City's housing needs.

Publication Draft Comments

6.303 As set out in the consultation statement, the following issues were raised during Publication Draft consultation;

- A significant number of residents object to the policy on the following grounds:
 - Exceptional circumstances have not been demonstrated.
 - Would result in the merging of Springwell Village with Washington and Gateshead.
 - The number of houses will be higher than those stated
 - Impact on infrastructure
 - Impact on road network
 - Impact on schools

- Impact on health services
- Loss of greenspace
- Loss of playing fields (HGA6)
- The sites are not suitable
- Object to the evidence base including OAN and Green Belt Exceptional Circumstances paper
- Sunderland has less Green Belt than neighbouring authorities.
- Impact on wildlife
- There are numerous brownfield sites available for development.
- Loss of playing fields would have adverse impact on health
- Impact on heritage, particularly the Bowes Railway.
- If new homes are needed, they should be low cost starter homes and accessible homes
- Concerned about noise impact from quarry on site HGA1.
- Springwell Village is taking a disproportionate level of growth.
- Consideration has not been given to cross boundary issues
- Question the need for new housing in a low wage economy
- Concerned that site HGA6 is being brought forward for financial reasons
- Barratt David Wilson Homes are broadly support the policy, but the approach is too prescriptive which may impact viability. Concerned about some vague criteria for site HGA3 (PD1611). Sunderland City Council (landowner) support the policy in particular sites HGA5 and HGA6 (PD3274). Story Homes broadly support the policy but would like a larger allocation made for sites HGA2 and HGA4 (PD5598). Hellens broadly support the policy but would like a larger allocation made for site HGA1 (PD242).
- Paul Mackings Consulting Ltd and Getton Construction Ltd concerned that not all non- Green Belt sites have been considered, such as Hendon Paper Mill and Albany Park (PD2943 & PD2600).
- Sunderland Civic Society are concerned that housing requirement is overambitious and unachievable; that site HGA2 would merge Springwell Village and Washington and spoil panoramic views (PD632 & PD1815). CPRE North East object on the grounds that exceptional circumstances have not been justified, that the OAN does not comply with the standard methodology, would result in weaker Green Belt boundaries and would affect the free-standing nature of the village (PD1069).
- Mr Ford (landowner) considers that exceptional circumstances have not been demonstrated (PD169, PD170, PD171 & PD172).
- Sunderland Green Party are concerned that the volume of responses from Springwell Village residents have not been taken into account, limited school capacity, loss of green space and playing fields (PD4534).
- Sunderland NHS CCG support criterion 2 of the policy (PD68).
- Highways England considers that additional modelling work is required (PD4841). Historic England welcomes protection for Bowes Railway SAM, but would welcome reference to the potential for archaeological investigation (PD94).
- Durham County Council welcome changes to the policy (PD1391).
- Mineral Products Association advises that Figure 20 is incorrect (PD4350).

How Issues Have Been Taken into account prior to Submission

- 6.304 In response to the representations raised by the Mineral Products Association (PD4350) the Council has proposed a minor modification as set out in the Schedule of Modifications.
- 6.305 The Council has taken into consideration the representations and are not proposing to make any further modifications to this policy. The Council considers that there are

exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper.

6.306 The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology. The Council has prepared an Infrastructure Delivery Plan, which has been informed by a Transport Assessment and Education Plan. This details the strategic infrastructure needed to deliver the plan. Other policies of the plan require the submission of transport assessments to identify any localised mitigation and Policies ID1 and ID2 will ensure that planning obligations are sought to provide any necessary infrastructure.

6.307 The Council has been working closely with Highways England on updated modelling work to assess the impact of the Plan upon the Strategic Road Network. In response to the representations raised by Historic England, a Statement of Common Ground has been signed to indicate that no modifications are required, as the existing heritage policies provide adequate policy coverage.

Proposed Modifications to the Publication Draft

6.308 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
SS2: HGA6	An additional bullet point to be added to the end of the policy: <u>viii. 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>	To address representations submitted by Sport England (PD4475) and a number of residents.

Duty to Cooperate

6.309 In their 2017 consultation response to the Draft Plan, Gateshead Council put forward the view that the identification of Housing Release Sites (now known as Housing Growth Areas) around Springwell Village and to the north of Washington gave insufficient weight to the strategic purpose of the Green Belt separating the conurbations. They requested that the emerging Plan excludes the proposed Housing Release Sites around Springwell Village and to the north of Washington (sites HRS1, HRS2, HRS3, HRS4, and HRS5), as these sites would have the effect of narrowing the strategic gap provided by the Green Belt in this area.

6.310 Meetings have taken place to discuss this matter further, discussing in more detail the impact to the gap whereby it was acknowledged that there is little or no impact from the Green Belt release sites east of Springwell Village and at High Usworth, with only slight impact to the southwest of Springwell Village. North of Usworth Hall, it was agreed that both local authorities were planning to reduce the Green Belt gap.

6.311 Sport England objected to the allocation of HGA6 on the grounds that an up to date Playing Pitch Strategy does not identify the site as surplus to requirements and that they have not

been approached in regard to the identification of suitable replacement sites. Sport England acknowledges that the Parklife Project might resolve this issue with some playing fields becoming surplus to requirements but it is premature to speculate which playing fields may become surplus at this time. The Council and Sport England are continuing to work together to resolve this issue.. The Council propose a modification to the Plan to clarify that 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.

Sustainability Appraisal (2017)

6.312 This is a new policy and so was not assessed as part of the Sustainability Appraisal (SA) (2017)(SD.12).

Sustainability Appraisal (2018)

This policy has not been subject to a detailed assessment, as the proposed allocation of Housing Growth Areas is subject to a separate assessment in Section 5.3 and Appendix E of the SA (2018) (SD.6).

Justified

6.313 The policy sets out guidance for the management and growth of the HGA sites in the Washington sub-area including sites HGA1 to HGA6 over the Plan period. The policy provides a clear indication as to what should be delivered as part of a planning application for the development of the sites. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

HGA1

Site location and description



6.314 The 3.20ha site is situated on the south western edge of Springwell Village, Washington and currently consists of arable land in an elevated position. Immediately to the north and east are existing residential properties of Wordsworth Crescent and Beech Grove, to the south lies arable land which is intended for the development of a reservoir with Mount Lane beyond, and to the east is Mount Lodge and associated farmland with Bowes Railway Scheduled Ancient Monument (SAM) beyond.

Figure 7 Location of HGA1 - South West of Springwell

Justification for removing site from the Green Belt.

6.315 As part of the Call for Sites for the Strategic Housing Land Availability Assessment (SHLAA)(SD.22¹⁰⁹) and the Strategic Land Review (SP.22¹¹⁰), Hellens submitted the site (SHLAA Sites 407 and 408) to the Council. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD.29-31¹¹¹). The following summarised the outcomes of each stage of the assessment:

¹⁰⁹ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

¹¹⁰ [https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_\(2016\).pdf?m=636804033613030000](https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_(2016).pdf?m=636804033613030000)

¹¹¹ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017)(SD.30¹¹²)** found that land to the north of HGA1 (SHLAA site 408) had less impact on Green Belt purpose. However, both sites adjoined the Bowes Railway Scheduled Ancient Monument (SAM), and therefore had an impact on a Category 1 designation. This impact did not directly impact on the land in question, and so the site was put forward to be considered at Stage 3 Site Selection (p69-71). This Assessment also included a call-for sites assessment. It recommended that the full area be considered at Stage 3, although parcel 407C would be considered on its own, whilst the remaining areas be considered jointly, and together with parcel 408 (see pages 137-142).
- **Stage 3 Green Belt Site Selection Report (SD.31¹¹³)** concluded that parcels 407 (A and B) and 408 should not be selected for Green Belt deletion (p63-64). These sites were not considered to be suitable or achievable because the operational and noise issues associated with substrate extraction from adjacent Thompson's quarry render the site unsuitable for housing development at this point in time. Whilst this was felt to be the key determining reason, here (not for 407B), the impact to Green Belt purpose, to the adjacent Scheduled Ancient Monument and to priority species/wildlife corridor are also significant cumulative factors to be considered. However Parcel 407C was considered to be suitable as an HGA site (p29-30).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹¹⁴)** states 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).

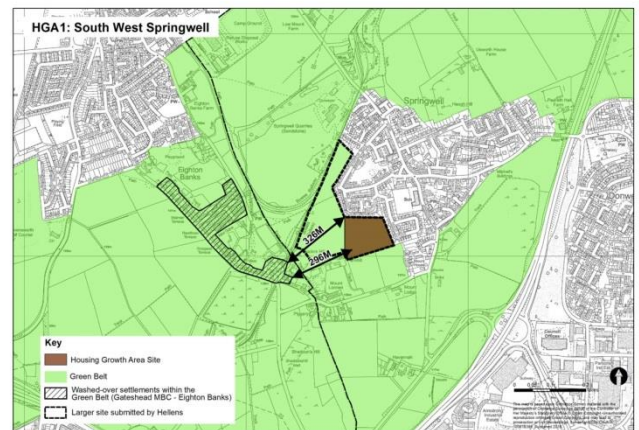


Figure 8 Green Belt context for Site HGA1

- 6.316 Overall, HGA1 performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. To a lesser extent, there is slight reduction to the development gap between Springwell Village (and new edge of built development within HGA1) and Eighton Banks from 350m to 330m.
- 6.317 The Council have taken into consideration the impacts of the Springwell Quarry when selecting the site boundaries. It is considered that the operational and noise issues associated with substrate extraction from the adjacent quarry would conflict with housing being located too close to their boundary, which would have an adverse impact on this

[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

[/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

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[/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

¹¹²[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

[/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

¹¹³[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

[/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%202%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

¹¹⁴[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%202%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

[Recommendations-2018-](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%202%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)
[/pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%202%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

business developing in the future and being contrary to policy 123 of the NPPF. Specifically, this could stop the business meeting the Environment Agency’s noise requirements.

6.318 The Council has received representation with specific concerns relating to the site 408 and the northern half of site 407. This is the principal reason why the larger 407/408 has not been progressed. HGA1 is set away from the quarry boundary and would not provide housing any closer than existing housing within Springwell Village. The developers considered that the noise impacts to site 407/408 would be the same as the impacts to a recently completed development in the village (Bowes Gardens, or former Volker Stevin site). Crucially, however, it should be noted that this site lies a minimum 300m away from the recycling operations, whereas site 407/408 would virtually adjoin the site. Therefore, the locations are significantly different.

6.319 The Site is actively marketed by Hellens, constituting an available and potentially achievable greenfield site (with appropriate mitigation). The site 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 therefore consider the boundary to be appropriate.

Allocation of HGA1

6.320 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹¹⁵) which includes:

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.321 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS2 established a framework for the future development of the HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.322 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	<p>Given the constraints on the site, the capacity is estimated to be approximately 60 dwellings.</p> <p>The scale of development is considered to be appropriate over the course of the Plan period as there are no other sites identified in the SHLAA in Springwell Village and the scale of development is considered to be appropriate for a village of 2,233 residents (Output Area data, mid-year 2016 estimates).</p>

115

[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

Mix of Family homes	The SHMA (SD.23 ¹¹⁶) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that greenfield sites, such as HGA 1 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (SD.62¹¹⁷) (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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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.</p> <p>There would also be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall. Development of this site would be expected to contribution towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>
Defensible Green Belt Boundary	The proposed boundaries of HGA1 would logically round-off the southern extent of Springwell Village. In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries along the western and southern edges.
Local Facilities	Springwell Village centre lies within 400m of the site and provides local facilities such as a local shop, community centre, Public House and primary school. It is considered that through layout and design access to services and facilities could be enhanced.
Bowes Railway	<p>The Bowes Railway Scheduled Ancient Monument (SAM) extends along the western and north-western boundary of the site. The railway is significant as an early 19th century railway with extensive survival of railway features and buildings, in particular the Blackhams Hill Engine House, a dominant building on the edge of development site. As SAMs the railway and engine house are of high significance. The early 18th century Birtley Fell Waggonway is recorded as running through the proposed development site. There is the potential for an archaeological resource relating to this to be present on the site.</p> <p>As HGA1 is set away from the SAM it is considered that with sensitive design mitigation, the open aspect of the SAM can be appropriately maintained. Historic England support the policy and the intention to protect the open aspect to the Bowes Railway Scheduled Ancient Monument, and also suggest that reference is made to the potential for archaeological investigation in the supporting text or the policy. The Council and Historic England have agreed a Statement of Common Ground and this includes revised policy wording in relation to the comment made.</p>
Greenspace improvements	<p>Springwell is relatively well located in terms of access to the open countryside, natural & semi-natural greenspace and the green infrastructure opportunities these landscapes provide. Springwell Village also benefits from good access to local cycle routes and rights of way networks.</p> <p>The area has a high level of amenity greenspace. Within approximately 300m of the development site is Springwell Village Park, also known as Seldom Seen Park. The</p>

¹¹⁶[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

¹¹⁷[https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

	<p>park includes a number of outdoor sports facilities and children’s play areas, a total of 3 children’s play areas exist within the village. To the north of the village a number of sports pitches including football pitches are located at campground. Whilst to the south of the site are Mount Lane allotments, located approximately 550m away.</p> <p>As part of the development, it will be expected that greenspace is enhanced</p>
Impact on GI, wildlife and landscape character	<p>HGA1 is surrounded by development on two sides and acts as infill to the settlement. The impact of the site to the wildlife and green infrastructure corridor that runs to the south, west and north of Springwell Village is considered to be minor.</p>
Heritage and character	<p>As a hilltop settlement, Springwell Village is afforded views to the south, east and north. From the southern edge of HGA1 the land falls away, offering extensive views southwards. 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 and to minimise the impact to the setting of Bowes Railway SAM.</p>
Ecological improvements	<p>This urban fringe site is an area of community playing fields, grassland, scrub and hedgerows, with extensive adjacent woodland; and there is a building on site. Nearby designated sites of nature conservation importance include General’s Wood Local Wildlife Site (LWS), Vigo Wood and Railway Embankment LWS, Worm Hill LWS and Princess Anne Park LWS. There are a number of potential protected and priority species associated with this site and surrounding area, such as breeding and wintering birds and bats.</p> <p>There are no direct impacts to protected wildlife sites on site. Sensitive design will be required to be able to mitigate for impacts to this site and 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.</p> <p>By contrast, the larger development site would virtually bound Springwell Ponds LWS, which is known to contain UK BAP Priority Species. This is a significant impact, which would be further compounded by the scale of the site’s potential impact on the wildlife corridor, increased potential to impact on other key species (such as farmland birds), and less land available that could provide compensatory habitat mitigation.</p>
Flood risk	<p>Flood risk data from the Environment Agency identifies no Flood Risk Zones, a 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.</p>
Accessibility and Transport	<p>Vehicle access to the site is currently restricted with no direct access from Mount Lane other than gated field access points.</p> <p>Mount Lane also provides connections to Springwell Village and to the A194(M) which provides direct links to the A1(M) and the wider regional road network. No formal rights of way or public footpaths are located within the site however a public footpath is located to the north west of the site and provides connections from Springwell Village to Eighton Banks through Springwell Ponds LWS. Springwell Village is well served by public transport with regular bus services to Nissan, the Galleries, Sunderland, Newcastle and Birtley.</p>
Access	<p>Access to be provided from Mount Lane through the field to the south</p>

Site location and description



Figure 9 Location of Site HGA2-East Springwell

6.323 The 6.07ha site is situated on the south eastern edge of Springwell Village, Washington and currently consists of open countryside which slopes from the north east to the south west. The site is immediately bounded by residential properties on Peareth Hall Road to the north and west, a mature woodland shelter belt to the east with the A194 beyond and open countryside to the south.

Justification for removing site from the Green Belt.

6.324 Story Homes submitted the site (SHLAA reference 424) as part of a call-for-sites for the SHLAA (SD.22¹¹⁸) and Strategic Land Review (SP.22¹¹⁹). As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD.29-31¹²⁰). The following summarised the outcomes of each stage of the assessment;

- **Green Belt Review Stage 1 (SD.29)** recommended that the area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p43).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017)(SD.30)** - found that the land did not impact on Category 1 designations, and so the site was put forward to be considered at Stage 3 Site Selection (p69-71). This Assessment also included a call-for sites assessment; it was recommended that the full area be considered at Stage 3 (p149).
- **Stage 3 Green Belt Site Selection Report (SD.31)** - concluded that the site was available, achievable and deliverable and considered suitable as an HGA site (p27-28).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹²¹)** concludes that the full site submitted by Story Homes provides a more logical and

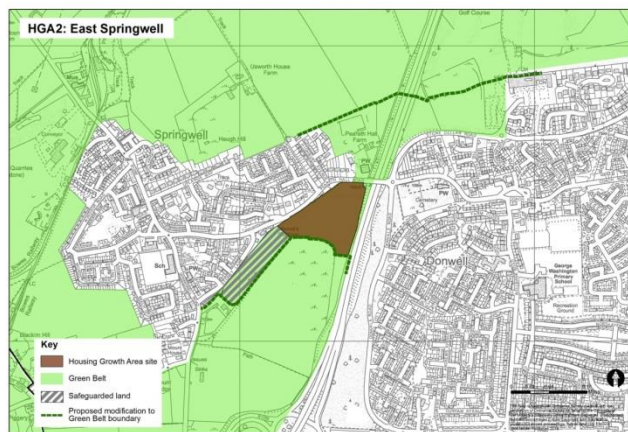


Figure 10 Green Belt context for Site HGA2

¹¹⁸[https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

¹¹⁹[https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_\(2016\).pdf?m=636804033613030000](https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-/pdf/SP.22_Strategic_Land_Review_-_Washington_(2016).pdf?m=636804033613030000)

¹²⁰[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

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[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹²¹<https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018->

defensible Green Belt boundary. This additional land has subsequently been put forward for safeguarded by the Council in the Publication Draft CSDP (SD.1¹²²). Additional boundary strengthening is still required along the southern boundary of the site (see pages 24-27).

- 6.325 Overall, this site 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.
- 6.326 The site is being actively promoted by Story Homes, constituting an available and achievable greenfield site (with appropriate mitigation) which is partly accessible to the centre of the village and lying close to a main bus route (sustainable location). The site provides infilling within a corridor that has already been compromised at Peareth Hall Road, and with appropriate design can provide a permanent and defensible new Green Belt boundary.

Allocation of HGA2

- 6.327 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹²³) which includes;
- A contextual analysis of the site and the surrounding area,
 - The site constraints and opportunities
 - Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.
- 6.328 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the Developer, Policy SS2 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.
- 6.329 The following justifies the policy requirements;

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 60 dwellings.
Mix of Family homes	The SHMA (SD.23 ¹²⁴) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that greenfield sites, such as HGA 2 could accommodate a lower density of development and achieve a higher proportion of family homes.

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¹²² https://www.sunderland.gov.uk/media/20849/SD-1-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft/pdf/SD.1_Core_Strategy_and_Development_Plan_2015-2033_Publication_Draft.pdf?m=636803778731670000

¹²³ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

¹²⁴ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

<p>Education and Healthcare</p>	<p>The Council's 2018 Education Report (SD.62¹²⁵) (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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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.</p> <p>There would also be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall. Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required</p>
<p>Local Facilities</p>	<p>Springwell Village centre lies within 800m of the site and provides facilities such as a local shop, community centre, Public House and primary school.</p>
<p>Defensible Green Belt Boundary</p>	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries. The southern boundary of the site, which faces what would become the new edge of the Green Belt, comprises a weak metal fence and sparse hedgerow and would require reinforcement in the form of dense planting/new treeline or other appropriate treatment to create a new, permanent boundary. A roughly rectangular area of land to the south of the proposed Housing Growth Area, adjacent to Stoney Lane, is proposed to be removed from the Green Belt and designated as Safeguarded Land. The Green Belt Boundary assessment (SD.34¹²⁶) concludes that the eastern boundary of the rectangular piece of land provides a more logical and defensible Green Belt boundary, though it would still need to be bolstered by dense planting to strengthen the boundary further.</p>
<p>Greenspace improvements</p>	<p>Springwell is relatively well located in terms of access to the open countryside, natural & semi-natural greenspace and the green infrastructure opportunities these landscapes provide. Springwell Village also benefits from good access to local cycle routes and rights of way networks.</p> <p>The area has a high level of amenity greenspace. Within approximately 800m of the development site is Springwell Village Park, also known as Seldom Seen Park. The park includes a number of outdoor sports facilities and children's play areas, a total of 3 children's play areas exist within the village.</p> <p>To the north of the village a number of sports pitches including football pitches are located at campground. Whilst to the south of the site are Mount Lane allotments, located approximately 1200m away.</p> <p>Land around Springwell Village is not used as a formal or informal play area, therefore has not been included in the city's Greenspace Audit. The Greenspace Audit (SD.47) states that Springwell Village has above average green space in terms of quantity, and the site in question would provide additional formal greenspace to the area.</p>

¹²⁵[https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

¹²⁶[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

Buffers	<p>The Council consider that the gap to the east of Springwell Village is 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.</p> <p>To limit noise that is generated by the A194(M) the development would be expected to include tree buffering as necessary.</p>
Heritage and character	<p>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 (SD.35¹²⁷) 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 (SD.28¹²⁸), sensitive design is also required throughout the development in order to minimise impact on the open landscape surrounding the village.</p>
Ecological improvements	<p>The site sits within a Wildlife Corridor linking open space to the north and south, and is made up of grassland fields, scattered trees, hedgerows and mixed plantation woodland.</p> <p>Nearby designated sites include Sheddons Hill Local Wildlife Site (LWS) and Springwell Pond LWS. All habitats on site have the potential to support a priority species such as breeding birds inclusive of ground nesting birds and commuting bats but is not limited to these species.</p> <p>There are no direct impacts to protected wildlife sites on site. Sensitive design will be able 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.</p>
Flood risk	<p>Flood risk data from the Environment Agency identifies no Flood Risk Zones, though the south part of the site is particularly affected by surface water flooding and public sewers also cross this part of the site- these issues would need to be appropriately considered. 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.</p>
Accessibility and Transport	<p>The site is located to the south of Peareth Hall Road which is a local distributor road between Springwell and Washington and provides connections to the A194(M) which directly links to the A1(M) and the wider regional road network.</p> <p>No formal rights of way, public footpaths or cycle routes are located within the site however several are located to the north providing connections into Wrekenton and to the south of the site a single path links Springwell Road and the A194(M). The site is well served by public transport with two bus stops located on Peareth Hall Road within 400m of the site providing regular connections to Nissan, the Galleries, Concord, Sunderland, Gateshead and Newcastle.</p>
Access	<p>Vehicular and pedestrian access from Peareth Hall Road between the existing properties on the western edge.</p>

HGA3

Site location and description

6.330 The 3.6ha site is situated on the north western edge of Usworth, Washington and currently consists of the pitch and putt area of George Washington Golf Course. The site is relatively

¹²⁷ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

¹²⁸ [https://www.sunderland.gov.uk/media/20871/SD-28-Gypsy-s-and-Traveller-s-Site-Assessment-Report-2017-/pdf/SD.28_Gypsies_Travellers_Site_Assessment_Report_\(2017\).pdf?m=636802951475200000](https://www.sunderland.gov.uk/media/20871/SD-28-Gypsy-s-and-Traveller-s-Site-Assessment-Report-2017-/pdf/SD.28_Gypsies_Travellers_Site_Assessment_Report_(2017).pdf?m=636802951475200000)



Figure 11 Location of HGA3 - North of High Usworth

level in nature and is surrounded by mature tree planting. The site is bounded by Stone Cellar Road to the south with residential properties beyond, to the east by the car park for the George Washington Hotel and Golf Course with the hotel structure and a modern executive housing development beyond. To the west lies the A194 which severs the site from Springwell and to the north is the golf course.

Washington and consists of post war housing. The Farthings to the south east consist of red brick detached bungalows and two storey family housing. All properties have protruding porches and garages with private front gardens and driveways.

Justification for removing site from the Green Belt.

6.332 The site was first put forward in the SHLAA (SD.22) (SHLAA reference 567) by Barratt David Wilson Homes. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD.29-31¹²⁹). The following summarised the outcomes of each stage of the assessment;

- **2016 Green Belt Review Stage 1 (SD.29)** recommended that the area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p34).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017)(SD.30)** found that a small proportion of the land (well away from HGA3) impacted on Flood Zone 3 (Category 1 designation), but as this area could be avoided, the site was put forward to be considered at Stage 3 Site Selection (p65-66). This Assessment also included a call-for sites assessment- this specifically investigated SHLAA site 567 (HGA3) and concluded that the area be considered at Stage 3 (p161).
- **Stage 3 Green Belt Site Selection Report (SD.31)** concluded that the site was available, achievable and deliverable and considered suitable as an HGA site (p31-32).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹³⁰)** concludes that the submitted site provides a logical and defensible Green Belt boundary,

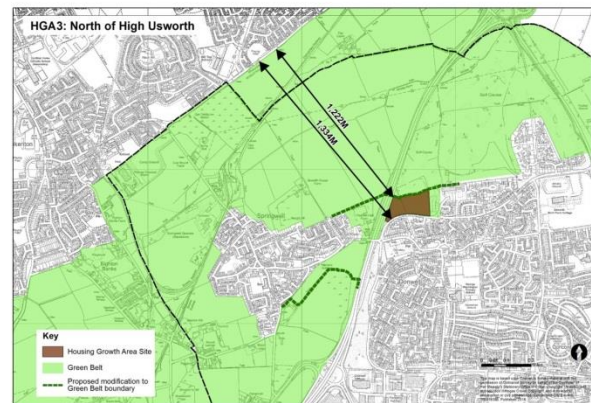


Figure 12 Green Belt Context for Site HGA3

¹²⁹ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹³⁰ <https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018->

[pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

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.

6.333 Overall, this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl, and countryside encroachment. The impact on settlement merging is limited in terms of its impact between Washington and Gateshead.

6.334 The site is actively marketed by Barratt David Wilson Homes, constituting an, available and achievable greenfield site (with appropriate mitigation).

Allocation of HGA3

6.335 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹³¹) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.336 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS3 established a framework for the future development of the HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.337 The following justifies the policy requirements;

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 45 dwellings.
Mix of Family homes	The SHMA (SD.23 ¹³²) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that greenfield sites, such as HGA 3 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (SD.62) (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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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.</p> <p>There would also be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall. Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan and has consulted with health</p>

¹³¹ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

¹³² [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

	<p>partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required</p>
Local Facilities	<p>Local facilities are provided by two local parades in Donwell (Durham Avenue and Wellgarth Road), these include general stores, a village centre, hot food takeaway and a public House. George Washington Primary School is within 800m of the site and Concord Local Centre is within one mile, providing a wide range of facilities.</p>
Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries.</p>
Buffer/Noise	<p>It is expected that noise will be generated from the A194(M), therefore appropriate mitigation should be put in place, including increased tree buffering as necessary.</p>
Greenspace improvements	<p>The site consists of an area of amenity grassland that is currently used as a practice area for the adjacent golf course, and an adjacent area of semi-improved grassland. The site forms part of a strategic Green Infrastrue Corridor running west-east between Washignton and Gateshaed.</p> <p>The Usworth area in general fares poor in terms of greenspace with below average levels of amenity greenspace. The nearest children's fixed play facility is over a kilometre away and the nearest formal park, Albany Park, 1 mile away. The Usworth area also has below average provision of allotments, with the nearest provision over 2 miles away to the south of the site.</p> <p>The site is within private ownership and is not classed as providing amenity greenspace. The site consists of a pitch & putt course, the loss of which would not have an impact on the viability of the main golf course. This is considered to represent a minor and acceptable loss of greenspace to the locality.</p>
Heritage	<p>There is no direct evidence for prehistoric or Roman activity within the site, but the presence of activity in the surrounding vicinity indicates that an as yet unidentified resource has the potential to exist.</p> <p>The site was within the landscaped area of Peareth Hall/Usworth House estate which was demolished sometime between the late 19th century and 1919. Historic mapping indicates the presence of a spring to the north of the site and tree planting along its eastern edge. Tracks or drives associated with the estate have the potential to survive within the proposed development boundary.</p> <p>Great Usworth to the south east of the site is first recorded in the Boldon Buke of 1183 and was expanded upon during the 18th and 19th centuries through the increase in coal mining. The wider area was developed as part of the New Town Development of Washington during 70s and 80s.</p> <p>Listed buildings of Peareth Hall Farm and Holy Trinity church are located within 300m of the site and Bowes Railway Scheduled Ancient Monument is over 990 to the west.</p>
Ecological improvements	<p>This site is immediately adjacent to the golf course and is made up of mature mixed plantation woodland, scrub habitats and amenity grassland which was once a pitch and putt area. The habitats on site have the potential to support a diverse range of species such as breeding birds of conservation importance and foraging and commuting bats but not limited to these species.</p> <p>There are no direct impacts to protected wildlife sites on site. Sensitive design will be able 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.</p>
Flood risk	<p>Flood risk data from the Environment Agency identifies no Flood Risk Zones, a low</p>

	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.
Accessibility and Transport	Stone Cellar Road borders the south of the site and is a two-way single carriageway suburban in nature and provides access to a number of existing residential estates, George Washington Golf Club and Sunderland College (Washington Campus). Stone Cellar Road connects to the A195 providing links to the A194(M), the A1(M) and the wider regional road network. No formal rights of way, public footpaths or cycle routes are located within the site however National Cycle Network Route 11 is located to the north east in Eighton Banks The nearest bus stop is located 325m from the site on Peareth Hall Road, providing regular connections to Concord, Sunderland, Gateshead and Newcastle.
Access	Vehicular and pedestrian access will likely be through the current car park of the hotel and golf course and should utilise existing gaps in the tree belt.

HGA4

Site location and description



Figure 13 Location of HGA4 - North of Usworth Hall

6.338 The 10.9ha site is situated on the north eastern edge of Usworth, Washington and currently consists of relatively level arable fields. The site is bounded by a hedgerow to the north with open countryside leading to the River Don beyond. To the east lies the former Leamside Line on an elevated embankment with mature tree planting. To the south the rear fences of existing residential properties of Merevale and Watcombe Closes directly present onto the site. The Grade II Listed Usworth Hall is positioned further south and is surrounded by a modern housing development. To the west lies

vacant land to be used for industrial purpose and Stephenson Industrial Estate beyond, a mature shelter belt also partially runs along the western edge with the Northern Area Playing Fields beyond.

Justification for removing site from the Green Belt.

6.339 In 2015, Persimmon Homes submitted the site as part of a call-for-sites for the SHLAA (SD.22¹³³) and Strategic Land Review (SP.22¹³⁴)(SHLAA reference 463). As the site is part of the Green Belt, the site was

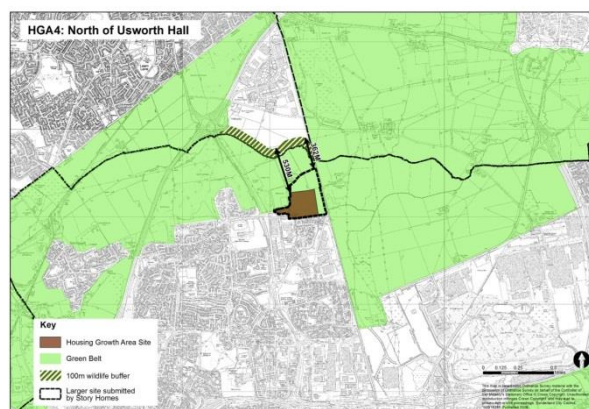


Figure 14 Green Belt context for Site HGA4

¹³³ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

¹³⁴ [https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-pdf/SP.22_Strategic_Land_Review_-_Washington_\(2016\).pdf?m=636804033613030000](https://www.sunderland.gov.uk/media/20964/SP-22-Strategic-Land-Review-Washington-2016-pdf/SP.22_Strategic_Land_Review_-_Washington_(2016).pdf?m=636804033613030000)

considered a every stage of the Green Belt Review (SD.29-31¹³⁵). The following summarised the outcomes of each stage of the assessment;

- **2016 Green Belt Review Stage 1 (SD.29)** separated the HGA land (parcel US6) from the land alongside the River Don (parcel US5). While parcel US5 was identified as being fundamental to Green Belt purpose, parcel US6 did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p34).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)** found that part of field parcel US6 was affected by Category 1 designation (Flood Zone 3). The assessment concluded that the Category 1 area be taken out of the parcel, and the remaining part of parcel US6 be considered at Stage 3 Site Selection (p65-66). This Assessment also included a call-for sites assessment- this broke SHLAA site 463 down into three sub-parcels. Parcel 463A (which equates to HGA4) was recommended to be considered in full at Stage 3 (see pages 152-155).
- **Stage 3 Green Belt Site Selection Report (SD.31)** concluded that the site was available, achievable and deliverable and considered suitable as an HGA site (p33-34).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹³⁶)** concludes that the north edge of the HGA site should form the new Green Belt boundary, considering that the land affected by Flood Zone 3 (to the east of HGA4) should also be omitted. Appropriate landscape treatment will be required along the northern and western edges to create new permanent and defensible Green Belt boundaries (see pages 22-24).

6.340 Overall, there are no major adverse impacts, and this land parcel performs moderately against Green Belt purposes, notably in terms of urban sprawl, settlement merging and countryside encroachment. Boundary treatment is particularly important in this respect, especially in order to help minimise impact to the settlement gap between Washington and Follingsby.

6.341 The site is being actively promoted by Story Homes, constituting an available and achievable greenfield site (with appropriate mitigation). With appropriate design, it can provide a permanent and defensible new Green Belt boundary.

Allocation of HGA4

6.342 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹³⁷) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

¹³⁵[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹³⁶[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

¹³⁷[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

6.343 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS3 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.344 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 205 dwellings.
Mix of Family homes	The SHMA (SD.23 ¹³⁸) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that Greenfield sites, such as HGA4 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (SD.62¹³⁹) (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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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.</p> <p>There would also be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall. Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan (SD.59¹⁴⁰) and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required</p>
Local Facilities	Local facilities are provided 1.5km from the site at Concord Local Centre, St Bedes Primary School is located 700m to the south west and Sunderland College (Washington Campus) is within 500m of the site. Washington Town Centre is 3km from the site and is easily accessible by public transport.
Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries.</p> <p>The proposed northern and eastern boundaries are currently somewhat arbitrary lines through the existing farmland. Therefore the site's eastern boundary should be the eastern edge of the railway line, which will constitute a permanent defensible boundary. Land adjacent to our proposed eastern boundary is subject to flooding, but it is logical to take the railway line as the new boundary rather than drawing it slightly to the west to exclude the area affected by flooding.</p> <p>A new treeline and/or dense vegetation would be required along the site's northern edge to create a new, defensible Green Belt boundary.</p>
Greenspace	The site is relatively well located in terms of access to the open countryside, natural

¹³⁸ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

¹³⁹ [https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

¹⁴⁰ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

<p>improvements</p>	<p>& semi-natural greenspace and the green infrastructure opportunities these landscapes provide. The site lies within a Green Infrastructure corridor linking east-west along the River Don, and also north-south incorporating Usworth Pond. The area fares well in terms of general greenspace with high levels of good quality amenity greenspace in close proximity. 300m to the south of the site at Meredale Close lays a children's play area, however there appears to be no direct pedestrian access to the facility.</p> <p>To the west of the site lies the Northern Area playing fields, home to Washington AFC and soon to be the location of a FA Park Life Hub- one of only three to be located in the city. Allotments are located approximately 1.5km to the south west. There site suffers from an existing overland flow route, that enters the site from the west. The source of which appears to be the built up area to the south west of the site, the water travels north east within the area of the trees to the west of the site, before ponding against the railway embankment to the north of the site. In addition the south eastern part of the site is at risk of fluvial flooding, again caused by overland flows from within the site being trapped by the railway embankment.</p>
<p>Impact on GI, wildlife and landscape character</p>	<p>The wildlife and GI corridor to the gap between Washington and Follingsby would be reduced from around 1200m to 900m, but still leaving a gap to the proposed development (from the River Don) of 500m. Sensitive design (and enhanced environmental land mitigation) will be able to mitigate for impacts to protected habitat and species along the River Don and within this corridor.</p>
<p>Heritage</p>	<p>There is no direct evidence for prehistoric or Roman activity within the study area, but the presence of activity in the surrounding vicinity indicates that an as yet unidentified resource has the potential to exist. Archaeological deposits relating to the medieval and post-medieval cultivation may survive across the site.</p> <p>By 1862 trees have been planted along two of the field boundaries and a cottage (Waterloo Cottage) has been constructed in the south-east part of the proposed site. The foundations of the 19th century cottage may survive within the south-east corner of the proposed site; this resource would have limited significance. An old mineshaft is recorded just to the south of the southern site boundary within the grounds of Usworth Place.</p> <p>The development can sympathetically support local architectural styles and materials, and limit harm to natural landscape and longer distance views afforded from the site. The Grade II Listed building of Usworth Hall is to the south of the proposed development area, and set within existing modern housing; this has no interrelation with the site and its setting will not be affected by the development.</p>
<p>Ecological improvements</p>	<p>The site sits within an important Strategic Wildlife Corridor and a Green Infrastructure Corridor, and forms part of the arable landscape traditional in this area. Nearby designated sites include Usworth Pond Local Wildlife Site (LWS), Follingsby Pond LWS, River Don Streambank LWS and proposed LWS's Usworth Burn (River Don South), River Don and Upper Don Tributaries. The arable land is bordered by scattered trees, dense scrub and hedgerows backing onto woodland. Established ditches and ponds are immediately adjacent to the site. All habitats on site have the potential to support a diverse range of species such as great crested newts, water vole, otter, breeding and wintering birds inclusive of farmland birds but is not limited to these species.</p> <p>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 to the north is minimised.</p>
<p>Flood risk</p>	<p>Further work demonstrates that appropriate mitigation can be carried out to the natural swale that exists to the north west of the site. The developer has avoided</p>

	the area that is affected by Flood Zone 2 and 3 to the south east of the site and is proposing an easement with regards to the public sewer that affects the site.
Accessibility and Transport	<p>The site is located to the south of the A194(M) and east of the A195. There is currently no vehicular access directly into the site. The nearest highway is Stephenson Road, located approx. 100m to the west. Stephenson Road is a local distributor road that provides access to various commercial properties as well as the residential estate surrounding Usworth Hall. Stephenson Road has been constructed to 7m widths allowing for a bus route to run through the area, however currently no operators are utilising the route.</p> <p>No formal rights of way, public footpaths or cycle routes are located within the site however a public right of way runs along the southern boundary. The nearest bus stop is located 400m from the site on Stone Cellar Road providing regular connections to Houghton-le-Spring, Washington Galleries, Concord, and Heworth Interchange providing further connections through the Tyne and Wear Metro network.</p>
Access	Vehicular and pedestrian access to the site would be provided from Stephenson Road and cut through the northern edge of the former Northumbria Centre

HGA5

Site location and description



Figure 15 Location of HGA5 - Fatfield

6.345 The site is situated on the south western edge of Fatfield Village, Washington within the River Wear corridor and currently forms part of James Steel Park with mature woodland including car parks and access roads. To the north of the site is Bonemill Lane, beyond this lies additional areas of James Steel Park open space and North Biddick Social Club to the north east and residential properties to the north west. To the east is the River Wear and its banks with Mount Pleasant beyond. Directly to the south is the Washington Highway (A182) with County Durham and Lord Lambton Estate beyond.

To the west lies Harraton and District Community Centre and associated children’s play area.

Justification for removing site from the Green Belt.

6.346 The site was first put forward by the Council in 2016. As the site is part of the Green Belt, the site was considered a every stage of the Green Belt Review (SD.29-31). The following summarised the outcomes of each stage of the assessment;

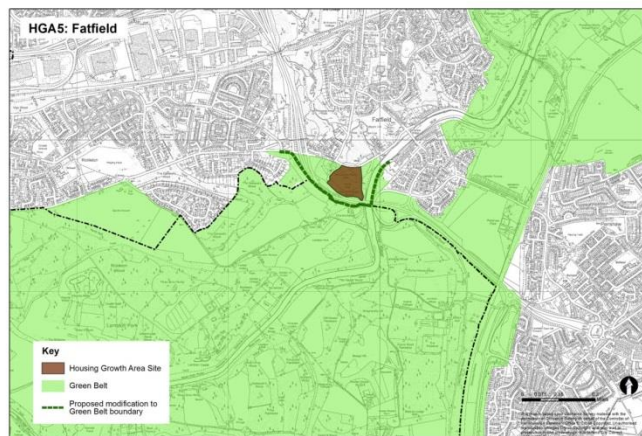


Figure 16 Green Belt Context for Site HGA5

- **2016 Green Belt Review Stage 1 (SD.29¹⁴¹)** recommended that the area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p64).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017)(SD.30¹⁴²)** found that the land did not impact on Category 1 designations, and so the site was put forward to be considered at Stage 3 Site Selection (p82-84). This Assessment also included a call -for sites assessment- again, it was recommended that the full area be considered at Stage 3 (p175).
- **Stage 3 Green Belt Site Selection Report (SD.31¹⁴³)** concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p37-38).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹⁴⁴)** 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).

6.347 HGA5 is a roughly square piece of land within James Steel Park to the south east of the settlement of Harraton. Whilst the site's release would result in the loss of existing greenspace, it is situated between the existing settlement extent and the A182 to the south and west – and by the River Wear to the east – which would form permanent, defensible Green Belt boundaries. Overall, there are no major adverse impacts, and this land parcel has minor/moderate impact against Green Belt purpose.

6.348 The site is Council owned and constitutes an available and achievable greenfield site (with appropriate mitigation) within a sustainable location in Fatfield village. Strong new Green Belt boundaries can be formed, using the River Wear and the A182.

Allocation of HGA5

6.349 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹⁴⁵) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.350 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS3 established a framework for the future

¹⁴¹[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

¹⁴²[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

¹⁴³[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹⁴⁴[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

¹⁴⁵[https://www.sunderland.gov.uk/media/20886/SD-43-Sunderland-Leisure-Needs-Study-2016-pdf/SD.43_Sunderland_Leisure_Needs_Study_\(2016\).pdf?m=636802957858500000](https://www.sunderland.gov.uk/media/20886/SD-43-Sunderland-Leisure-Needs-Study-2016-pdf/SD.43_Sunderland_Leisure_Needs_Study_(2016).pdf?m=636802957858500000)

development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.351 The following justifies the policy requirements;

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 30 dwellings.
Mix of Family homes	The SHMA (SD.23 ¹⁴⁶) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that greenfield sites, such as HGA5 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (SD.62) (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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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.</p> <p>There could be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall. Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan (SD.59¹⁴⁷) and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required</p>
Local Facilities	The site lies on a main bus route with regular services to The Galleries shopping centre, and also lies close to public houses and restaurants. Primary and Secondary Schools are available in Fatfield, and small local shops also located nearby in Fatfield and Harraton.
Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would need to ensure the creation of defensible Green Belt boundaries.</p> <p>The Green Belt Boundary Review (SD.34¹⁴⁸) recommended that the entire section of land between the River Wear, the A182 and Bonemill Lane should be removed from the Green Belt. Whilst we acknowledge the presence of a children's play area and some existing buildings within the western area, if that section of land was not removed it would leave an isolated triangle of land which does not fulfil any meaningful Green Belt role.</p>
Greenspace improvements	The site currently comprises part of James Steel Park and the strategic River Wear Green Infrastructure corridor. Associated pedestrian routes run through the site as well as the C2C cycle route along the eastern boundary. James Steel Park stretches along the River Wear from the waterfowl park in the east, to Fatfield in the west,

¹⁴⁶[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

¹⁴⁷[https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

¹⁴⁸[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

	<p>with contrasting areas of countryside linked by the river. Visitors can walk through woods, open spaces, farmland or by the river. The Fatfield area has a very high quantity and quality of amenity greenspace with above average provision of allotments.</p> <p>The Fatfield area has a very high proportion of greenspace (almost 3 times the city average), which equates to 41ha surplus according to the Greenspace Audit (SD.47). 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.</p>
Heritage	<p>The existing site of James Steel Park was formally occupied by the wider village of Fatfield, consisting of residential terraces, places of worship, Public Houses and wagon ways leading to Ferry landings. The development of Washington New Town removed the village and formed the Washington Highway and James Steel Park.</p>
Ecological improvements	<p>The site sits within Strategic Wildlife Corridors and a Green Infrastructure Corridor, and forms part of a public park/greenspace with areas of woodland and grassland. Nearby designated sites of nature conservation importance include Worm Hill Local Wildlife Site (LWS), Princess Anne Park LWS and General's Wood LWS. There are a number of protected and priority species associated with this site and surrounding area, such as breeding and wintering birds and bats.</p>
Flood risk	<p>The site lies within close proximity of the River Wear and the land directly to the east is within Flood Zone 2. A small area of the highway on the eastern boundary is identified as being subject to surface water flooding.</p> <p>A preliminary drainage report has been prepared by the Council. With regards to flooding, the development will be set back from the river and will not be effected by Flood Zones 2 and 3. The report demonstrates that there are a number of options for the disposal of surface water from the site to the River Wear. The section of River Wear adjacent to the site is tidally dominated, as such the site will be permitted to drain to the River Wear at an un-attenuated rate. It is recommended that surveys of the existing drainage systems are undertaken in order to confirm drainage areas and suitability to be incorporated into the detailed drainage design. It is proposed that any surface water generated in events with a magnitude of greater than 1 in 100 AEP + 40% Climate Change are directed to the River Wear via overland exceedance flow routes. The peak foul water loading from the development will be directed to the on-site 225 mm diameter combined sewer.</p>
Accessibility and Transport	<p>The site is located on Bonemill Lane which is a local distributor road between Fatfield and Rickleton and provides connections within 200m to the Washington Highway (A182) which directly links to the A1(M) and the wider regional road network. The site is also bounded to the east and west by unnamed roads which provide access to car parks within the site.</p> <p>There are no designated Public Rights of Way or cycle routes within the site however there are several formal footpaths.</p> <p>The site is well served by public transport with bus stops located directly to the north on Bonemill Lane providing regular connections to Washington Galleries and Sunderland.</p> <p>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 have an adverse impact which could not be mitigated.</p>
Access	<p>Vehicular access would be provided from one or more of three potential access points on Bonemill Lane utilising existing highway.</p>

HGA6

Site location and description



Figure 17 Location of HGA6 - Rickleton

directly bounded by a mature woodland which forms part of Lord Lambton's Estate.

Justification for removing site from the Green Belt.

6.353 The site (ref 810) was first put forward by the Council in 2016. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD.29-31¹⁴⁹). The following summarised the outcomes of each stage of the assessment;

- **2016 Green Belt Review Stage 1 (SD.29)** recommended that the area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p64).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017)(SD.30)** found that the land did not impact on Category 1 designations, and so the site was put forward to be considered at Stage 3 Site Selection (p82-84). This Assessment also included a call-for sites assessment- again, it was recommended that the full area be considered at Stage 3 (p173).
- **Stage 3 Green Belt Site Selection Report (SD.31)** concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p35-36).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34¹⁵⁰)** concludes that the eastern boundary of the site would require enhancement in the form of additional dense vegetation and/or trees in order to create a more robust, defensible new Green Belt boundary. The proposed southern boundary will be permanent and defensible by virtue of the existing dense woodland immediately beyond (to the south) of the new boundary (see pages 30-32).

6.352 The 18.66ha site is located on the southern edge of Rickleton, Washington and on the boundary with County Durham. The site is relatively level in nature and currently consists of playing fields, scrub land and an arable field. The site is immediately bounded by a mature tree belt to the west with existing residential communities of Rickleton beyond, to the north is Bonemill Lane with a large area of green space beyond and to the west is a public bridleway and Generals Wood residential estate. The south of the site is

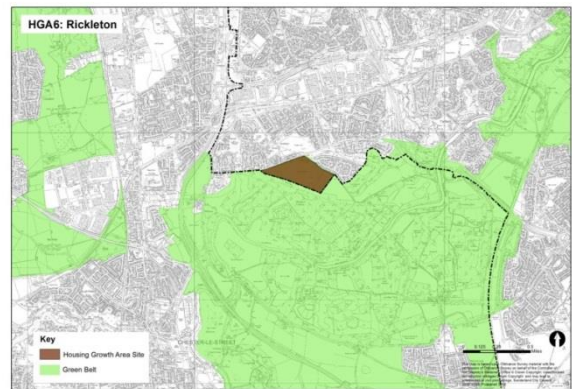


Figure 18 Green Belt Context for Site HGA6

¹⁴⁹[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage \(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29%20Green%20Belt%20Review%20Stage%201%20Core%20Strategy%20Growth%20Options%20Stage%20(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

¹⁵⁰[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

- 6.354 Overall, there are no major adverse impacts. This land parcel has moderate impact against Green Belt purpose, most notably in terms of countryside encroachment and urban sprawl, although the site is also well enclosed by mature woodland to the south.
- 6.355 Site is Council owned and constitutes a potentially available and achievable greenfield site (with appropriate mitigation) within a sustainable location in Rickleton village. Subject to successful demonstration (and Sport England endorsement) that playing fields are no longer required. Strong new Green Belt boundaries can be formed, using Rickleton Wood.

Allocation of HGA6

- 6.356 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35¹⁵¹) which includes;
- A contextual analysis of the site and the surrounding area,
 - The site constraints and opportunities
 - Parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.
- 6.357 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS3 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.
- 6.358 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 200 dwellings.
Mix of Family homes	The SHMA (SD.23 ¹⁵²) recognises the lack of suitable family homes in the City. The Plan promotes a mix of homes across the City, but it is expected that Greenfield sites, such as HGA6 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	The Council's 2018 Education Report (SD.62)(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, resulting in an overall deficit of 154 places. However, options are available to assist in meeting this deficit 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. There could be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall.
Local Facilities	Local facilities are provided within 500m of the site at Vigo Lane and include a medical practice and Public House. Rickleton Primary School is also located 300m to the north west.

¹⁵¹[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

¹⁵²[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries.</p> <p>The eastern boundary currently comprises a well-defined hedgerow and field boundary. Nevertheless, Green Belt Boundary Review concluded that significant enhancement in the form of additional dense vegetation and/or trees will be required in order to create a more robust, defensible new Green Belt boundary. The proposed southern boundary will be permanent and defensible by virtue of the existing dense woodland immediately beyond (to the south) of the new boundary.</p>
Greenspace improvements	<p>The site currently operates as playing fields and is commonly known as Southern Area Playing Fields. A public right away passes along the eastern edge of the site. The site forms part of the River Wear Green Infrastructure Corridor.</p> <p>The area fares well in terms of general greenspace with high levels of good quality amenity greenspace in close proximity. 500m to the north of the site lies Rickleton Park. The park includes a number of outdoor sports facilities and children's play areas, a total of 2 children's play areas exist within close proximity to the site.</p> <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 Greenspace Audit (SD.47).</p> <p>The 2018 Playing Pitch Plan (SD.44¹⁵³) 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.</p>
Heritage	<p>An Archaeological Desk Top Assessment has been prepared. A number of post-medieval features of industrial interest were located on the site. These consist of Pit Row Colliery, former miner's houses from Nova Scotia and a building of unknown function labelled as Harraton Outhouse. The site lies in an area with a background of prehistoric sites and activity and it is possible that unknown features of this date may survive on the site. An appropriate evaluation strategy should be agreed with the Tyne and Wear Archaeology Officer, which should include targeted trenches on the post-medieval features of industrial interest, if they fall within areas scheduled for development.</p>
Ecological improvements	<p>This urban fringe site is an area of community playing fields, grassland, scrub and hedgerows, with extensive adjacent woodland; and there is a building on site. Nearby designated sites of nature conservation importance include General's Wood Local Wildlife Site (LWS), Vigo Wood and Railway Embankment LWS, Worm Hill LWS and Princess Anne Park LWS. There are a number of potential protected and priority species associated with this site and surrounding area, such as breeding and wintering birds and bats.</p>
Flood risk	<p>A preliminary drainage report has been prepared by the Council. The report demonstrates surface water can be disposed from the proposed development site in accordance with national and local policy requirements to an on-site 450mm diameter surface water sewer. It is proposed that surface water runoff rates will be restricted to the current greenfield rates via a complex control structure. It is recommended that surveys of the existing drainage systems are undertaken in order to confirm drainage areas and suitability to be incorporated into the detailed drainage design. It is likely that foul flows from the southern extent of the site will</p>

¹⁵³[https://www.sunderland.gov.uk/media/20887/SD-44-Sunderland-City-Council-Playing-Pitch-Plan-2018-/pdf/SD.44_Sunderland_City_Council_Playing_Pitch_Plan_\(2018\).pdf?m=636802958247370000](https://www.sunderland.gov.uk/media/20887/SD-44-Sunderland-City-Council-Playing-Pitch-Plan-2018-/pdf/SD.44_Sunderland_City_Council_Playing_Pitch_Plan_(2018).pdf?m=636802958247370000)

	need to be pumped via a rising main to the 300mm foul sewer located in Bonemill Lane.
Accessibility and Transport	<p>The site is currently accessed via Bramhall Drive which also provides vehicle access to Generals Wood. Bonemill Lane runs along the western boundary of the and is a local distributor road between Fatfield and Rickleton, providing connections to the Washington Highway (A182) which directly links to the A1(M) and the wider regional road network.</p> <p>Public transport connections are located within 500m of the site on Vigo Lane and provide connections to Washington The Galleries, and Sunderland City Centre. A public Bridleway runs along the north eastern boundary of the site and continues into County Durham.</p> <p>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 on adverse impact which could not be mitigated.</p>
Access	Vehicle access would be provided from the existing site entrance on Bramhall Drive As part of a Transport Assessment junctions would be assessed in vicinity of the site, including junctions with Bonemill Ln, Picktree Lane, A183, A1 (M) and A182

6.359 Throughout the preparation of the Plan, alternative sites have been submitted to the Council as options. The following summarises why the Council do not consider any of these sites to be an appropriate alternative allocation.

Site	Justification for discounting approach
Peareth Hall Farm and Gospel Hall Trust	The Council contacted the landowners and their agent to request additional supporting information be provided within a given time period, in order to demonstrate that the site could be delivered within the Plan period. However, no further supporting documents were submitted by the given date. Therefore, the Council concluded that the landowners could not demonstrate with any certainty that the site could be delivered within the Plan period and therefore it could no longer be supported as a reliable part of the Council's housing land supply.
Land at Glebe House Farm, Pattinson	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.
Land at Mount Lane, Springwell Village	The Council carried out the Green Belt Assessment Stage 1 Updated and Stage 2 report (SD.30 ¹⁵⁴) which concluded 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 (SD.31 ¹⁵⁵). Furthermore, the 2018 Green Belt Boundary Assessment (SD.34 ¹⁵⁶) (p25-27) notes that the wider section of Green Belt around Springwell and to the north of Usworth provides the entire strategic separation between

¹⁵⁴[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

¹⁵⁵[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹⁵⁶<https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018->

[/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-)

	<p>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.”</p> <p>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.</p>
Land at East House Farm	<p>The site in question is located to the north of the proposed safeguarded land “East of Washington”, and extends into South Tyneside. It is a large site, proposing circa 500-800 homes. This land area is referred to in the Green Belt Assessment Stage 1 Updated and Stage 2 (SD.30¹⁵⁷) 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 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.</p>

6.360 The proposed allocation of Green Belt Housing Release Sites within the Washington area has followed a Green Belt Review and site selection process. This concludes that the proposed allocations can and should be released from the Green Belt to contribute to meeting Sunderland’s OAHN. Failure to release these sites would either result in Sunderland’s OAHN not being met or would require alternative and potentially less suitable areas of Green Belt land to be released for housing.

Effective Deliverable

6.361 The developers in their representations to the Council have supported the allocations of these sites for residential development and consider that the sites are deliverable. In regards to the infrastructure requirements to deliver the site, it is expected that developer contributions will be sought in accordance with Policy ID1, ID2 and the emerging Planning Obligations SPD (SD.63¹⁵⁸). The Council’s Viability Assessment (SD.60¹⁵⁹). has concluded that sites of a similar typology are viable.

6.362 The policy will be delivered through the submission of planning applications by housing developers and the Council and their determination by the Local Planning Authority

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP3	Washington	Sets out the spatial strategy for	<ul style="list-style-type: none"> Failure to focus economic 	<ul style="list-style-type: none"> Identify reasons for lack of 	<ul style="list-style-type: none"> Employment land (ha) and floorspace (sqm) 	<ul style="list-style-type: none"> SCC Monitoring data

¹⁵⁷[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

¹⁵⁸[https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_\(2018\).pdf?m=636803113837800000](https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_(2018).pdf?m=636803113837800000)

¹⁵⁹[https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017.pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017.pdf?m=636803111173630000)

		Washington	<p>growth in identified Employment Areas and the IAMP</p> <ul style="list-style-type: none"> • A significant amount of out-of-centre office, retail and other Main Town Use development • Failure to deliver new homes within identified Housing Growth Areas 	<p>implementation</p> <ul style="list-style-type: none"> • Potential review of the Plan/Policy • Potential review of the strategic approach to identification of land for development 	<p>developed for B1, B2 and B8 uses within identified Employment Areas</p> <ul style="list-style-type: none"> • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas • Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within designated town centre • Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in designated primary shopping areas of town centre • Percentage of primary frontages in non-A1 use in designated town centre • Length of primary frontages in A1, A2, A3 and A5 retail uses in designated town centre • Housing completions and delivery within identified Housing Growth Areas • Plots created on allocated travelling showpeople sites 	<ul style="list-style-type: none"> • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment
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Consistent with National Policy

6.363 By allocating these sites for housing the Plan is managing the patterns of growth within the City to make the fullest possible use of public transport and focus significant development in locations that can be made sustainable (Para 17 of the NPPF). The policy is also ensuring that the required infrastructure is provided for the site.

SS3 Safeguarded Land

6.1 This policy is intended to safeguard Land East of Washington and South East of Spingwell from development during the Plan period. It is considered that these sites could accommodate sustainable communities in the future but development would require infrastructure improvements.

SS3 Safeguarded Land

Land East of Washington and land South of East Springwell has been removed from the Green Belt and designated as Safeguarded Land.

Planning permission for the development of Safeguarded Land will not be granted except where development is temporary or would otherwise not prejudice the ability of the site to be developed in the longer term.

Positively Prepared

Vision and Strategic Priorities

6.364 The policy will assist the delivery of the vision by safeguarding land for long term development that will support the city's future, being healthy, safe and prosperous, where people have the opportunity to fulfil their ambitions.

6.365 Policy SS3 will help to deliver Strategic Priorities 1 and 2 and 4.

Draft Plan Comments

6.366 As set out in the consultation statement, the following issues were raised during the draft Plan consultation;

- Homes England support the approach to safeguarded land.
- Highways England supports the policy.
- South Tyneside Council oppose the policy as it would have significant impacts on the wildlife corridor.
- Persimmon and Barratt David Wilson Homes oppose the policy and consider the land should be allocated in the Plan.
- Other developers have suggested alternative sites to be safeguarded.

How Issues Have Been Taken into Account at Publication Draft

6.367 The Publication Draft Plan continues to support safeguarded land, and has identified two sites, one to the east of Washington and the other to the south east of Springwell Village.

Publication Draft Comments

6.368 As set out in the consultation statement, the following issues were raised during Publication Draft consultation;

- Sunderland Civic Society considers that both sites are retained in the Green Belt (PD677);
- Residents are concerned that removal of Green Belt to the south east of Springwell Village would place further risk on local infrastructure and that it would not result in durable Green Belt boundaries (PD8431, PD252 & PD257). Springwell Village Residents Association object to the policy, stating concern that once protection is removed land will come forward for housing and will further affect village character and infrastructure. It will also conflict with the aims to provide a defensible boundary (PD5014);
- CPRE does not consider that exceptional circumstances have been demonstrated to remove the land from the Green Belt. Proposals would lead to weaker Green Belt boundaries and affect the character of Springwell Village (PD1392);
- Barratt David Wilson Homes support the exceptional circumstances case, but would like their site at Washington Meadows to be allocated for development (PD5324). Church Commissioners for England consider that Phase 2 of the South Ryhope site should be allocated or identified as safeguarded land (PD5246). Bellway Homes consider that insufficient level of growth is being proposed within Washington and would like to see their site at East House Farm safeguarded (PD1921);
- Hellens Group and Hellens Land Ltd consider that additional land should be removed from the Green Belt for safeguarding at HGA7 and at Hastings Hill (PD4794 & PD4872).

- Story Homes consider that the safeguarded land south east of Springwell Village should be allocated and the land to the north of site HGA4 allocated or safeguarded (PD5652);
- Clive Milner (landowner) proposes the safeguarded land to the east of Washington to be allocated, as it is deliverable. He further debates the deliverability of site HGA1, and proposes land to the south of the new access road (at Severn Houses) should be removed from the Green Belt (PD231). Mr. Gregson (landowner) considers that land at Burdon should be safeguarded (PD1657 & PD1668). Mr. Hutchinson (landowner) proposes an additional site at Glebe House Farm to be safeguarded (PD2025);
 - Taylor Wimpey states that there are limited sites available for development at Houghton-le-Spring and therefore suggests allocating or safeguarding their site east of Seaham Road (PD3972);
 - Highways England considers that additional modelling work is required (PD4842). Homes England supports the identification of safeguarded land to the east of Washington and would support its allocation within the plan period (PD4341). The Environment Agency expresses concerns over flood risk and amenity issues on the land to the east of Washington. Whilst acceptable as safeguarding land the EA would find the plan unsound if it was allocated, as it would require a sequential and exceptions test (PD208);
 - South Tyneside Council note the policy and welcome the opportunity to enter into discussions to ensure the long term integrity of the Inter-District GI Corridor, and to further consider how the impacts on the road network and local ecology would be managed and maintained (PD4385).

How Issues Have Been Taken into account prior to Submission

- 6.369 The Council has taken into consideration the representations and is not proposing to make any modifications to this policy.
- 6.370 The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundaries. This is set out within the Exceptional Circumstances report (SD.33¹⁶⁰). With regards to the safeguarded land identified, the Council has identified safeguarded land in accordance with the NPPF to ensure that the Green Belt boundaries endure well beyond the end of the plan period. The Green Belt Boundary Review (SD.34¹⁶¹) indicates why the Council has chosen to amend Green Belt boundaries in certain areas and not others. It is considered that the proposals would result in strong defensible Green Belt boundaries.
- 6.371 The Council has been working closely with Highways England on updated modelling work to assess the impact of the Plan upon the Strategic Road Network. The Council will continue to work closely with South Tyneside Council and Gateshead Council on cross boundary planning matters.

Proposed Modifications to the Publication Draft

- 6.372 No modifications are proposed to the Publication Draft Plan.

¹⁶⁰ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

¹⁶¹ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

Duty to Cooperate

6.373 Dialogue has taken place with South Tyneside MBC (STMBC) relating to IAMP and the proposed Safeguarded Land. STMBC's main concern relates to the potential impact to the Ecological Landscape Mitigation Area (ELMA) associated with the IAMP, and that the Safeguarded Land would ultimately need to respect this area and also provide appropriate ecological mitigation.

Sustainability Appraisal (2017)

6.374 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA.

Sustainability Appraisal (2018)

6.375 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA.

Justified

6.376 The NPPF indicates that Green Belt should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. When revising Green Belt boundaries, the NPPF also indicates that local planning authorities should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The third bullet point under paragraph 85 of the NPPF explains that, where necessary, the Local Planning Authority should identify 'safeguarded land' between the urban area and the Green Belt, in order to meet likely longer term strategic development needs beyond the plan period.

Land East of Washington

6.377 Policy SS3 ('Safeguarded Land') identifies approximately 100 hectares of land to the east of Washington and to the west of the International Advanced Manufacturing Park ('IAMP') site as Safeguarded Land, to meet future development needs beyond 2033. This land is not allocated for development within the Plan and the site will not be developed within the plan period unless a review is undertaken. The land will, however, be removed from the Green Belt and held in reserve to meet future development needs. It will assist in maintaining the permanence of the new Green Belt boundary and reduce pressure to undertake a further Green Belt boundary review in the near future.

6.378 The Green Belt Boundary Review (SD.34¹⁶²) carefully considered the current and emerging national guidance relating to Green Belt boundary reviews, and reached the conclusion that, exceptional circumstances do exist that justify the removal of some land from the currently defined Green Belt within the northern part of the city. The effect of removing the IAMP site from the Green Belt is that there is an area of land to the immediate west of that site which will arguably perform a more limited Green Belt function than was the case prior to the allocation of the IAMP in the adopted AAP (SP.9¹⁶³).

6.379 The proposed Safeguarded Land at East Washington is well contained between existing built development to the west and south, and the boundary of the IAMP site to the east. The removal of part or all of this land from the currently defined Green Belt therefore appears to be a logical step in the context of the wider strategic release of Green Belt in

¹⁶²[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-099430000.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-099430000.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954)

¹⁶³[https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-099430000.pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_\(2017\).pdf?m=636803121719830000](https://www.sunderland.gov.uk/media/20913/SP-9-International-Advanced-Manufacturing-Park-Area-Action-Plan-2017-099430000.pdf/SP.9_International_Advanced_Manufacturing_Park_Area_Action_Plan_(2017).pdf?m=636803121719830000)

this location. This area of land is well-placed to meet potential future development needs in the northern part of the city, and will assist in ensuring the permanence of the new Green Belt boundary in accordance with the NPPF. The Green Belt Boundary Review (SD.34¹⁶⁴) therefore confirms that as the general area of land will become isolated from the broader Green Belt there is strong justification for the removal of the land to accommodate future development needs.

6.380 The proposed Safeguarded Land was also assessed in detail as part of the Green Belt Assessment (SD.29-34¹⁶⁵). The Stage 3 report (SD.31) recognised that the north-western part of that overall area is affected by flood risk and that the western half of the combined area is part of a strategic green corridor. Nevertheless, the report concluded that if the scale of development can enable provision of on-site facilities to enable the site to become suitable and sustainable in access terms – and the significant constraints relating to the impact to the local highway network and to area biodiversity, hydrology and green infrastructure can be overcome – then the site is potentially achievable.

6.381 The boundary of the safeguarded land is identified in the Green Belt Boundary Assessment (SD.34) (paragraphs 4.33-4.39). The Assessment concludes that the new Green Belt boundary will help to ensure that a strategic gap remains between Sunderland and South Tyneside.

South East Springwell

6.382 Land to the south east of Springwell Village is also identified for safeguarding. As stated in the Green Belt Boundary Review (SD.29-34), a roughly rectangular area of land to the south of the proposed Housing Growth Area, adjacent to Stoney Lane, is proposed to be removed from the Green Belt and designated as Safeguarded Land. The eastern boundary of the rectangular piece of land provides a more logical and defensible Green Belt boundary, though it would still need to be bolstered by dense planting to strengthen the boundary further.

Development of Safeguarded land

6.383 Although development will not generally be appropriate on Safeguarded Land, it is recognised that not all development will prejudice the function and the value of the land. It may therefore, be appropriate to permit development required in connection with established uses, or change of use to an alternative open land use or to temporary uses which would not prejudice the possibility of development after the Plan is reviewed, nor is detrimental to the character of the site and its surroundings.

¹⁶⁴[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

¹⁶⁵[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-.pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-.pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-.pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-.pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-.pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-.pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)
https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32_Green_Belt_Assessment_-_2018_Addendum.pdf?m=636802953199630000
https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1_-_Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000
[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-.pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

Reasonable Alternatives

- 6.384 An alternative approach to safeguarding these sites would be to allocate them for development. However the Council are not convinced that there is compelling evidence to suggest that the land should be released and allocated for development within the Plan period. The Council has undertaken a robust and comprehensive Green Belt Assessment (SD.29-34¹⁶⁶), which has resulted in the identification of 11 proposed Housing Growth Areas. Those 11 sites, together with the IAMP, are capable of accommodating the projected housing and employment needs of the city over the Plan period. The Council has sought to identify a range of sites in sustainable locations in the north and south of Sunderland and therefore the Council consider this approach to be sound.
- 6.385 In regards to land east of Washington, it is the Council's view that if the site was to come forward in the future a comprehensive approach would be required to address the infrastructure requirements and site constraints. The developers have suggested that the Plan could allocate some of the site for development within the Plan period, however the Council do not consider that this approach is justified. For the site to be sustainable, services such as local shops and a primary school would be required. It is unclear how a smaller development could deliver these infrastructure requirements. In addition, as the site is not allocated the site constraints and cumulative impacts of the site have not been taken into consideration by statutory bodies such as the Environment Agency or Highways England. 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. This assessment work will be undertaken when and if there is a justification to allocate the site in the future.
- 6.386 Linked to this, there are large parts of the site that are affected by Flood Zones and surface water flooding. The Environment Agency has stated that while they accept the site being identified for safeguarding, they have reservations for the site being brought forward as an allocation because a Second Level Strategic Flood Risk Assessment (SFRA2) would be required to be carried out. When further detailed flood studies were carried out for IAMP, the flood zones were extended significantly, and given the very flat nature of the safeguarded land site, there is potential for flood zones to be extended across this area too. Without further detailed work being undertaken, there remains doubt whether additional flood zone land could be identified as a result, impacting on the full development potential of the overall site, and yet again raising viability and deliverability issues.
- 6.387 In the longer term, the Council considers that there is potential to create a sustainable community in Washington once the IAMP has progressed, as well as the potential to re-

¹⁶⁶ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)
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https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_the_Green_Belt.pdf?m=636802953653470000
[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

open the Leamside Line for passenger rail or Metro services. Further studies however will be required to demonstrate that the scheme is viable, access can be achieved, environmental mitigation that relates (but is not limited) to biodiversity and flooding can be delivered and infrastructure can be delivered.

6.388 In regards to Land South East of Springwell, the developers are suggesting that this land is also allocated in the Plan. The Council considers that the scale of development proposed by the developer is inappropriate at this time and as and when it is appropriate to bring this site forward any assessment work will be undertaken when and if there is justification to allocate the site in the future.

6.389 A number of other sites have been put forward to be allocated in the Plan, with a proviso that if their site was not supported as such, it should therefore be considered as a Safeguarded Site. The sites are as follows:

Site	Justification for discounting approach
Land north and west of HGA1	<p>The sites proposed are not considered to be suitable or achievable because the operational and noise issues associated with substrate extraction from adjacent Thompson's quarry render the site unsuitable for housing development at this point in time.</p> <p>The Council also consider that the impacts relating to Green Belt purpose, to the adjacent Scheduled Ancient Monument and to priority species/wildlife corridor are also significant.</p> <p>The Green Belt Boundary Review (SD34¹⁶⁷) did not support this amendment.</p>
Land north of HGA4	<p>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). In terms of biodiversity, the Council considers that the additional impacts from this scale of development could not be satisfactorily mitigated for. Gateshead MBC as well as the biodiversity officer at South Tyneside MBC have raised objection to development in this locality.</p> <p>The Green Belt Boundary Review (SD34¹⁶⁸) did not support this amendment.</p>
Land south of HGA7	<p>This site 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.</p> <p>The Green Belt Boundary Review (SD34) did not support this amendment.</p>
Land at East House Farm	<p>The site in question is located to the north of the proposed safeguarded land "East of Washington", and extends into South Tyneside MBC. It is a</p>

¹⁶⁷ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

¹⁶⁸ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

	<p>large site, proposing circa 500-800 homes. This land area is referred to in the Green Belt Assessment Stage 1 Updated and Stage 2 (SD.30¹⁶⁹) 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 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.</p> <p>The Green Belt Boundary Review (SD34) did not support this amendment.</p>
Land at Hastings Hill and Middle Herrington	<p>The Green Belt Boundary Review (SD.34) (p35-36) 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." 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. 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.</p>
Land to the east of Seaham Road, Houghton	<p>The land in question lies to the east of Houghton-le-Spring and is proposed for 270 houses. The Green Belt Assessment Stage 1 Updated and Stage 2 report confirms (SD.30¹⁷⁰) (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 (SD.34¹⁷¹) (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 (SD.47) 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.</p> <p>The site is also assessed at Stage 3 Green Belt Site Selection Report (SD.31¹⁷²) (p83) which confirms that the site is not suitable due to the reasons outlined above.</p>
Land to south of SSGA Site	<p>The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report</p>

¹⁶⁹[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

¹⁷⁰[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

¹⁷¹[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%202%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

¹⁷²[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

South of Ryhope	(SD.30 ¹⁷³) 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. 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 Plan and the SSGA Masterplan/SPD.
Land at Burdon	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report (SD.30) 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.

- 6.390 The Council did consider the alternative of not identify any safeguarded land. However, due to limited land supply within the urban area and the need to revise Green Belt boundaries as part of this Plan, it was considered prudent to identify a future area for growth at this stage and remove this from the Green Belt boundary now, to reduce the likelihood of needing to undertake another Green Belt Review as part of the next plan. Changing the status of land from Green Belt to 'safeguarded land' would however not have substantive effects, as this would itself not provide support for permanent development of the land until a future review of the Sunderland Plan determines that the safeguarded land should be released for development.
- 6.391 The Council considers that further sites put forward by developers for safeguarding are not justified without further Green Belt and SHLAA reviews that would be more in-sync with social, economic and environmental issues relevant at the time of Plan review. The Green Belt Reviews (SD.29-34¹⁷⁴) identified these sites as having moderate/significant Green Belt

¹⁷³ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

¹⁷⁴ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)
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https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000
[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

purpose and the Green Belt Boundary Assessment (SD.34¹⁷⁵) recommends that the existing Green Belt boundary should be retained in these areas.

Effective Deliverable

6.392 The sites will be removed from the Green Belt and safeguarded from development. Safeguarded land can only be released for development through a review of the Plan, in accordance with national policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS3	Safeguarded Land	Identifies and protects land to the east of Washington for development beyond the plan period	<ul style="list-style-type: none"> Failure to deliver the amount of development proposed in the Plan 	<ul style="list-style-type: none"> Identify reasons for lack of development Review of land allocated for development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Housing completions against the overall plan period target for 13,410 net additional homes to 2033 Housing delivery (net additions) against the plan period requirements of average 745pa net additions Number of new jobs created Land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses Amount (sqm) of new comparison retail floorspace created 	<ul style="list-style-type: none"> SCC Monitoring data Nomis (ONS data) Employment Land Review

Consistent with National Policy

6.393 The Core Planning Principles set out in the NPPF (para 17) state that patterns of development should be actively managed to make the fullest possible use of public

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[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SP4 North Sunderland

6.394 The purpose of Policy SP3 is to establish a spatial strategy for the future development of North Sunderland. North Sunderland is a heavily urbanised sub-area located between the River Wear to the south and is separated from the villages of South Tyneside to the north by Green Belt. The area contains the attractive beach resorts of Seaburn and Roker as well as Key Employment Areas along the river corridor.

SP4 North Sunderland

North Sunderland will continue to be the focus for regeneration and renewal. In order to achieve this:

1. the council and its partners will work to secure regeneration and renewal at Marley Potts and Carley Hill;
2. Housing Growth Areas at North Hylton and Fulwell (Policy SS4) are allocated to ensure there is land for the future growth of North Sunderland; and
3. economic development will be focussed on identified Employment Areas (Policies EG1 and EG2).

Positively Prepared

Vision and Strategic Priorities

6.395 This policy will assist in the delivery of the vision by helping to ensure that the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities; is open and responsive to the changing needs and demands of our growing economy; creates new and diverse job opportunities particularly in advanced manufacturing; and has a network of green infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all.

6.396 Policy SP4 will help to deliver Strategic Priorities 2, 3, 4 and 5.

Draft Plan Comments

6.397 This is a new policy, so no previous comments have been received.

How Issues Have Been Taken into Account at Publication Draft

6.398 This is a new policy, so no previous comments have been received.

Publication Draft Comments

6.399 As set out in the consultation statement, the following issues were raised during Publication Draft consultation:

- The Trustees of Athenaeum Pension Scheme support HGA8 (PD41);
- Hellens Group support the policy but suggest a larger allocation for site HGA7 (PD4730);
- Sport England object to the development of site HGA6 until an up-to-date Playing Pitch Assessment shows it as being surplus to development. Sport England acknowledges that the emerging Park Life programme may render the site surplus to requirement (PD4499);
- South Tyneside Council supports the policy (PD4396);
- Sunderland Civic Society, CPRE North East, Pawz for Thought and a number of residents object to the policy and the allocation of sites as Housing Growth Areas for the reasons set out in Policy SS4.

How Issues Have Been Taken into account prior to Submission

6.400 In response to the representation raised by Sport England (PD4499) the Council has proposed an additional modification to Policy SS4: HGA8 (M25) as set out in the Schedule

of Modifications. The Council’s Green Belt Assessment considered the larger Hellens site, but discounted as it scored strongly against Green Belt purposes.

Proposed Modifications to the Publication Draft

6.401 The following main issues were identified by representations to Policy SP4:

Policy/ Para/ Figure	Proposed Change	Justification
Figure 23	Replaced map, amended key	For clarity

Duty to Cooperate

6.402 There are no issues identified against this policy as part of the Duty to Cooperate.

Sustainability Appraisal (2017)

6.403 This is a new policy and so was not appraised as part of the SA (2017) (SD.12)¹⁷⁶.

Sustainability Appraisal (2018)

6.404 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA (SD.6)¹⁷⁷. However the following recommendations were made for policy enhancements. The Council’s response to these recommendations is set out below:

Recommendation	SCC Response
The inclusion of a minimum number of units to be allocated in the North Sunderland Area through the future A&D Plan should be deleted from this policy, as this effectively sets a local housing target without it having been subject to capacity testing or SA. If a local housing target for the A&D Plan is established through the CSDP, this could affect future decisions regarding the acceptability of allocating specific sites within the A&D Plan.	Recommendation agreed and implemented.

Justified

6.405 The policy provides an overarching spatial strategy for the sustainable growth of the Sunderland North sub-area. It identifies more detailed policies and site specific allocations within the plan that will assist in achieving the overarching strategy for the area.

6.406 As previously discussed, housing supply is limited in the North Sunderland Area and given that household size is decreasing, there is potential for the long term viability of local services and facilities to be affected.

6.407 The Council is committed to the future sustainability of North Sunderland and through its regeneration and renewal programme have prioritised development at Marley Potts and Carley Hill. Following on from the successful regeneration of the area through public, private and Registered Provider developments, a number of sites have been identified to further enhance the area. A masterplan is being prepared for North Sunderland to deliver approximately 800 new homes, along with a new school and enhancements to public green

¹⁷⁶ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

¹⁷⁷ <https://www.sunderland.gov.uk/media/20852/SD-6-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-Non-Technical-Summ.pdf?m=636802912395830000>

spaces. As such, the area has been identified as an area where the focus for regeneration will continue.

- 6.408 Two HGA's have been identified to be allocated in North Sunderland; North Hylton and Fulwell. The site at Fulwell lies within the urban fringe and is well located to public transport and local facilities. The North Hylton site is immediately linked to the main road network and lies within the main built-up area of Sunderland. The scale of development proposed at both HGA sites is not considered to unduly alter the adjacent urban area character. Site HGA7 will impact on the approach to the hamlet of North Hylton, but will retain a buffer from the riverside development. The impact from HGA8 to the Fulwell area is considered to be minor. Further justification for the allocation of these sites is included in the Compliance Paper for Policy SS4.
- 6.409 Sunderland North contains a number of employment sites, particularly along the northern banks of the River Wear. Whilst these employment areas are generally largely developed, there are still some opportunity sites within them, which will help to provide a sufficient supply of employment land within the Sunderland North subarea. The Council will seek to safeguard these areas as Primary and Key Employment Areas under policies EG1 and EG2 for B1, B2 and B8 use classes. The areas safeguarded are broadly consistent with the recommendations set out within Appendix 3 of the Sunderland Employment Land Review (2016) (SD.37)¹⁷⁸.

Reasonable Alternatives

- 6.410 The proposed allocation of Housing Growth Areas within the North Sunderland have been identified following a comprehensive Green Belt Review and site selection process as detailed in Appendix F of the SA (SD.6). The evidence suggests that the proposed allocations should be released from the Green Belt to contribute to meeting Sunderland's objectively assessed housing need. Failure to release these sites would either result in Sunderland's objectively assessed housing needs not being met or would require alternative and potentially less suitable areas of land to be released for housing. Therefore the Council consider that there are no reasonable alternative to this policy can therefore be identified.

Effective

Deliverable

- 6.411 The policy will be delivered through the submission and determination of planning applications. The Council will work with partners including Homes England and Housing Associations such as Gentoo to facilitate the regeneration and renewal of Marley Potts and Carley Hill.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP4	North Sunderland	Sets out how North Sunderland will continue to be regenerated	<ul style="list-style-type: none"> Failure to secure renewal and regeneration at Marley Potts or 	<ul style="list-style-type: none"> Identify reasons for lack of development Review of 	<ul style="list-style-type: none"> Planning applications granted for regeneration and renewal at Marley Potts 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications Employment

¹⁷⁸[https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)
[https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_\(2016\).pdf?m=636803862875470000](https://www.sunderland.gov.uk/media/20969/SD-37a-Sunderland-Employment-Land-Review-2016-MAPS/pdf/SD.37a_Sunderland_Employment_Land_Review_MAPS_(2016).pdf?m=636803862875470000)

			<ul style="list-style-type: none"> Carley Hill Failure to deliver new homes within identified housing Growth Areas Significant amount of employment uses permitted outside of identified Employment Areas 	<ul style="list-style-type: none"> land allocated for development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> and/or Carley Hill Housing completions and delivery within identified Housing Growth Areas Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses 	<ul style="list-style-type: none"> Land Review Retail Health & Capacity Studies Retail Needs Assessment
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Consistent with National Policy

6.412 The Core Planning Principles set out in the NPPF (para 17) state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SS4 North Sunderland Housing Growth Areas

6.413 This policy allocates housing growth areas in North Sunderland to support the sustainable growth of the area.

SS4 North Sunderland Housing Growth Areas

Development of the North Sunderland Housing Growth Areas should:

1. provide a mix of housing types with a focus on family homes;
2. address impacts and make provision or contributions towards education provision and healthcare;
3. enhance access to local facilities and services, and

HGA7 North Hylton should:

- i. deliver approximately 110 new homes;
- ii. create a new defensible Green Belt boundary to the west, south and east of the site;
- iii. 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;
- iv. create buffer zones to support wildlife and to address noise from the A19 and A1231 directly bordering the western and northern edges of the site;
- v. retain all healthy trees and hedgerows and incorporate greenspace into the site for amenity purposes/minimise impact on priority species and protected habitat in the locality;
- vi. ensure that a Habitats Regulations Assessment is undertaken and appropriate mitigation provided;
- vii. mitigate the impacts of the natural swale to the west of the site and associated surface water flooding, and provide easements for public sewers as necessary;
- viii. be of high architectural quality to protect long distance views throughout the development towards Penshaw Monument and along the River Wear corridor;
- ix. provide pedestrian/cycleway connections from the site to (and along) Ferryboat Lane as well as links into existing public rights of way to the south of the site; and
- x. include vehicle access from Ferryboat Lane and include necessary mitigation works to A1231.

HGA8 Fulwell should:

- i. deliver approximately 80 new homes;

- ii. create a new defensible Green Belt boundary to the west and north of the site;
- iii. maintain wildlife and green infrastructure corridors to the north and limit any impact on the areas landscape character through sensitive boundary treatments;
- iv. retain the mature tree belts on the western and southern edges of the site, and incorporate greenspace into the site for amenity purposes;
- v. provide greenspace improvements to Fulwell Quarries to compensate for area greenspace loss in the locality;
- vi. ensure that a Habitats Regulations Assessment is undertaken and appropriate mitigation provided;
- vii. 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;
- viii. provide pedestrian/cycleway connections through the site and link to routes to the west and the wider area; and
- ix. include vehicle access to the east to connect to Newcastle Road, and carry out further highway improvements as necessary.

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.

Positively Prepared

Vision and Strategic Priorities

- 6.414 The policy will assist in the delivery of the vision by helping to ensure that the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities.
- 6.415 Policy SS4 will help to deliver Strategic Priorities 1, 2 and 4.

Draft Plan Comments

- 6.416 As set out in the consultation statement, the following issues were raised during the draft Plan consultation:

HRS9 – Land to the North and West of Ferryboat Lane, North Hylton

There is some support for the development of the site although the following comments have been received from local residents and stakeholders:

- Potentially impact on the Grade II listed Shipwrights Public House should be recognised and significance understood
- Loss of agricultural land
- Impact on panoramic views
- No services in close proximity
- Natural springs and watercourses within the site
- Site would be on the receiving end of noise and air pollution from the A19 and A1231
- Development would cause flooding to existing homes
- Site was considered unsuitable for development in earlier stages of the Green Belt Review and is not suitable for development
- Access to the site is difficult especially for larger vehicles
- Questioned whether the required buffer zones can be accommodated.

HRS10 – Land at Newcastle Road, Fulwell

The following comments were made by local resident and stakeholders and are specific to the site:

- There is no mention of the adjacent/nearby WW1 acoustic mirror, Grade II* Fulwell Mill and Grade II Lime Kilns at Fulwell Quarry. Their significance should be understood to be compliant with NPPF
- Loss of playing pitches
- Site is visible from the surrounding area
- Former landfill site
- The driving range is referred to as a golf course and needs to be amended.

How Issues Have Been Taken into Account at Publication Draft

6.417 In response to the issues raised, the Council responds as follows:

HRS9 – Land to the north and west of Ferryboat Lane, North Hylton

- The land is classed as Grade 3b agricultural land which is defined as being of moderate quality. Therefore using this land would not be contrary to the NPPF.
- The land is in private ownership. 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 Green Belt Boundary Review recommends that the land that was originally identified as unsuitable for development is retained in Green Belt and therefore the site has been reduced accordingly.
- 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 also been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot, bicycle and public transport as well.
- A Phase 1 Habitat Survey has been prepared to determine the species that are present and it is considered that suitable mitigation can be put in place.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- The site is affected by surface water flooding and the initial scheme design has considered how this can be treated through the use of greenspace and SUDS. The final site design will fully address flood mitigation needs and adhere to CSDP policy.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement have been prepared. The recommendations of which will be brought forward as part of the development.

HRS10 – Land at Newcastle Road, Fulwell

- The playing fields have not been used for at least 3 years. The Greenspace Report indicates that the area is shown to have amenity greenspace levels above the city average. The loss of greenspace within the neighbourhood can be offset by the enhancement to the wider Fulwell Quarry area, which is proposed for upgrading into a country Park.
- The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement have been prepared. The recommendations of which will be brought forward as part of the development.

Sensitive design will ensure that there is zero effect to nearby designated assets. There is potential to enhance the setting of the Acoustic Mirror from the development.

- A Transport Assessment has also been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot, bicycle and public transport as well.
- A number of studies have been carried out on the site including a Phase 1 Habitat Survey, visual impact assessment, ground investigations. The findings and recommendations of these studies will be implemented as the site comes forward.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.

Amendments to the Draft Plan

6.418 The 2 sites have been renamed and are as follows: HGA7 North Hylton, and; HGA8 Fulwell. Detailed development principles and parameters are now included for each site.

Publication Draft Comments

6.419 As set out in the consultation statement, the following issues were raised during Publication Draft consultation:

- A significant number of residents objected to the allocation of site HGA7 on the following grounds:
 - Exceptional circumstances have not been demonstrated and development would be contrary to the NPPF
 - Unreliable evidence base
 - Impact on biodiversity
 - Allocation is flawed as it has not considered HRA impact or impact on wildlife and green infrastructure corridor
 - Impact on views from the A19
 - Impact on Area of High Landscape Value
 - Impact on infrastructure
 - Impact on road network
 - Impact on Grade I Listed building
 - Concern over consultation process
 - New housing should be built on brownfield sites
 - The OAN calculation is flawed
 - Distance from local services;
- Sunderland Civic Society raised similar issues to residents and also expressed concerns over noise and pollution impact from nearby roads (PD1058). CPRE North East raised similar issues to residents and also that the proposal will dramatically and adversely affect the existing community (PD1162);
- Cllr Denny Wilson objects to site HGA7 on the grounds that there are exceptional circumstances, the impact of the site on designated ecological sites, protected species, wildlife corridors and that it would result in urban sprawl (PD5503). Cllr Doris MacKnight expressed concerns over the impact of the development on the environment and access (PD411);
- Pawz for Thought raised similar concerns to the residents and also the order in which evidence documents were prepared (PD275). Naturally Wild Consultants Ltd objected to the policy due to impact on biodiversity, contravention of NERC Act 2006, impact on green corridor and that exceptional circumstances have not been demonstrated (PD163 & PD1536). Sunderland Green Party object to both allocations- HGA7 due to

loss of agricultural land, unsustainable location and impact on landscape, and HGA8 because of loss of playing fields (PD4478);

- Mr. Ford (a local landowner) is concerned that non-Green Belt sites have not been considered first and also indicates that a HRA is required for HGA8 (PD174). Paul Mackings Consulting Ltd raise concern that not all non-Green Belt sites have been considered, such as Hendon Paper Mill (PD2952);
- Historic England would like references to designated assets to be updated for site HGA8 (PD95). Highways England considers that additional modelling work is required (PD4843);
- The Trustees of Athenaeum Pension Scheme supports the objectives of the policy, but also support a larger allocation for site HGA8. (PD42 & PD43). Hellens Group supports the policy, but suggests some wording changes for Site HGA7 (PD4761).

How Issues Have Been Taken into account prior to Submission

6.420 In response to the representations raised by Historic England (PD95), the Council has proposed an additional modification as set out in the Schedule of Modifications. The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances Paper (SD.33)¹⁷⁹. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018) (SD.24)¹⁸⁰. The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

Proposed Modifications to the Publication Draft

6.421 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
SS4: HGA8	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 <u>Grade II listed buildings</u> , <u>Grade II* listed Fulwell Mill</u> and <u>Grade II listed Lime Kilns</u> ;	To address representations submitted by Historic England (PD95). The Council has also signed a Statement of Common Ground (SD.8k).
SS4: HGA8	An additional bullet point to be added to the end of the policy: <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>	To address representations submitted by Sport England (PD4499) and a number of residents.

Duty to Cooperate

6.422 South Tyneside MBC raised the need for further discussions regarding potential Green Belt release sites on both sides of the administrative boundaries. Further discussions have

¹⁷⁹ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

¹⁸⁰ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

taken place and there has been no specific issue raised regarding the proposed HGA sites in North Sunderland.

- 6.423 Sport England objected to the allocation of HGA8 (Fulwell) on the grounds that an up to date Playing Pitch Strategy does not identify the site as surplus to requirements and that they have not been approached in regard to the identification of suitable replacement sites. Sport England acknowledges that the Parklife Project might resolve some playing fields becoming surplus to requirements but it is premature to speculate which playing fields at this time. The Council and Sports England are continuing to work together to resolve this issue. The Council consider that there have an up to date PPS and the site is currently disused. The Council propose a modification to the Plan to clarify that 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.

Sustainability Appraisal (2017)

- 6.424 This is a new policy and so was not appraised as part of the SA (2017) (SD.12)¹⁸¹.

Sustainability Appraisal (2018)

- 6.425 This policy has not been subject to a detailed assessment, as the proposed allocation of Housing Growth Areas is subject to a separate assessment in Section 5.3 and Appendix E of the SA (SD.5)¹⁸².

Justified

- 6.426 The policy sets out guidance for the management and growth of the HGA sites in the Coalfield Area including sites HGA7 and HGA8 over the Plan period. The policy provides a clear indication as to what should be delivered as part of a planning application for the development of the sites. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

HGA7

Site location and description

- 6.427 The 6.37ha site is situated between the Wessington Way (A1231), A19 and the River Wear on the north site of Sunderland. The site consists of gently sloping arable fields subdivided by a hedge row and ditch toward the west. The land beyond the south of the site steeply slopes toward the River Wear. North Hylton is 100m north of the site and includes Sunrise Enterprise Park and residential properties. To the east lies Baron's Quay and Timber Beach LWS with the business park beyond. Directly to the south is Ferryboat Lane with small groupings of residential properties and the



Figure 19 HGA7

¹⁸¹ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

¹⁸² [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

Shipwrights Hotel and Public House, beyond this lies the River Wear corridor. To the west is the A19 and to the North West is Nissan.

Justification for removing site from the Green Belt

- 6.428 In 2016, Barratt David Wilson Homes had interest in the site (416), but this passed to Hellens in 2017. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review. The following summarises the outcomes of each stage of the assessment:
- **2016 Green Belt Review Stage 1 (SD.29)**¹⁸³ recommended that the HGA7 area (shown as parcel HY2 in this report) did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p51). Site 416 represents a larger site, and includes parts of field parcel HY1- this parcel of land is considered to be fundamental to Green Belt purpose.
 - **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)**¹⁸⁴ found that the land did not impact on Category 1 designations, and so field parcel HY2 was put forward to be considered at Stage 3 Site Selection (p74-75). This Assessment also included a call-out-for-sites assessment (p144-145)- SHLAA site 416 was investigated, as was Site 416A (a reduced site area). Site 416 was considered to perform strongly against Green Belt purpose and was therefore discounted. Site 416A was considered to have moderate impact and it was recommended that this area be considered at Stage 3
 - **Stage 3 Green Belt Site Selection Report (SD.31)**¹⁸⁵ concluded that the site was available, achievable and deliverable and considered suitable as an HGA site (p41-42).
 - **2018 Green Belt Boundary Assessment and Recommendations (SD.34)**¹⁸⁶ 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).
- 6.429 Overall, there are no major adverse impacts, and this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. Boundary treatment is particularly important in this respect, being designed so as to minimise impact of site on the River Wear corridor.
- 6.430 The site is actively marketed by Hellens, constituting an available and achievable greenfield site (with appropriate mitigation).

Allocation of HGA7

- 6.431 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development

¹⁸³ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

¹⁸⁴ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

¹⁸⁵ [https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

¹⁸⁶ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

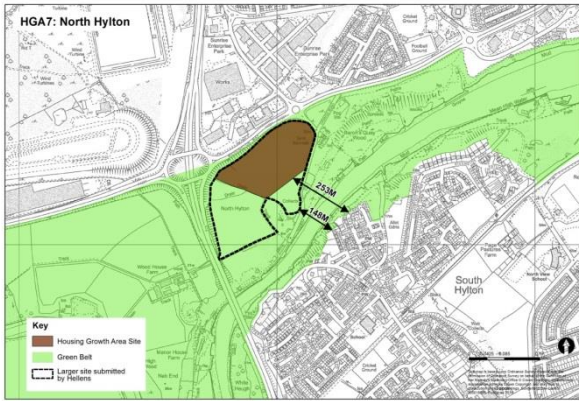


Figure 20 HGA 7

potential of each site, taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks which includes:

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- A parameter plan, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.432 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the Developer, Policy SS7 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.433 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 110 units.
Mix of Family homes	The SHMA recognises the lack of suitable family homes in the city. The Plan promotes a mix of homes across the city, but it is expected that Greenfield sites, such as HGA7 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (see p8-10) (SD.62)¹⁸⁷ considers the full impact of the 2 HGA sites on primary and secondary schools in North Sunderland. The Housing Growth Areas within North Sunderland will generate an additional 44 primary school places and 23 secondary places. Overall (taking all residential development into account), there will still be a surplus of Primary School places in the North area, but there will be a particular shortage around Southwick (as a result of the scale of development focused in this area) and as such a new Primary School is required.</p> <p>There may be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall.</p> <p>Development of this site would be expected to contribution towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>
Local Facilities	The site lies within 800m of regular bus services on Ferryboat Lane (north). Local facilities exist at nearby Castletown and the site has good vehicle access to the surrounding local and strategic road network.
Defensible Green Belt Boundary	In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries.

¹⁸⁷ [https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

HRA	Further work is being undertaken by the developer regarding the site HRA.
Greenspace improvements	<p>The site forms part of the River Wear Green Infrastructure corridor. A public right of way passes through the site. Baron's Quay and Timber Beach Local Wildlife Site (LWS) are approx. 20m from the site and High Wood LWS is approx. 300m from the site. The area fares well in terms of general greenspace with above average levels of good quality amenity greenspace in close proximity. 700m to the north of the site lies Billy Hardy Sports Complex. The facility includes a number of outdoor sports facilities and a children's play areas.</p> <p>The site has a low probability of flooding from any water sources including river, groundwater, sewers and other artificial sources.</p>
Impact on GI, wildlife and landscape character	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.
Landscape value	<p>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.</p> <p>The scale of the larger development proposed by Hellens would be significant, impacting further into the corridor, further onto riverside views and merging into the hamlet of North Hylton.</p>
Trees and buffers	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.
Ecological improvements	<p>The site is situated within a Strategic Wildlife Corridor which runs parallel with the River wear, supporting species rich hedgerows, mature trees, agricultural fields and margins abutted by semi mature woodland. Baron's Quay and Timber Beach Local Wildlife Site (LWS) is approx. 20 m from the site and High Wood LWS approx. 300m from the site. Sunderland's N2K sites are under 6km to the east, therefore impacts on these and the Durham coast SSSI will need to be considered and addressed. There are a number of protected and priority species associated with this site and surrounding area, including breeding and wintering birds, bats and great crested newts. Further survey work for species and habitats will be required to understand the full impact of development.</p> <p>There are no direct impacts to protected wildlife sites on site. 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.</p> <p>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.</p>

	The site has been assessed as part of the Sustainability Appraisal (SD.5) ¹⁸⁸ which states that impacts can be mitigated against and that development will be limited by the buffering constraints.
Flood risk	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.
Accessibility and Transport	The site is bound to the north by Wessington Way (A1231), to the west by the A19 providing connections to the regional highway network. To the east and south the site is bounded by Ferryboat Lane which is a single carriageway road connecting to the A1231 via a roundabout. Overall, it is considered that the site has good vehicle access to the surrounding local and strategic road network. Improvements are planned for the A1231 in the vicinity of the site as part of the Sunderland Strategic Transport Corridor (SSTC). The site lies within 800m of regular bus services on Ferryboat Lane (north) to Washington and Sunderland. The site is not subject to any designated rights of way or cycle routes running through it, however National Cycle Route 7 (C2C) runs from the south along ferryboat lane and along the eastern boundary of the site.
Access	A single vehicular access point is considered to be appropriate for the proposed quantum of development. The proposed vehicular access to serve the site will be formed on Ferryboat Lane.

HGA8

Site location and description



Figure 21 HGA8

show room, allotments and the Acoustic Mirror SAM beyond. To the west lies a mature tree belt with paths running through and Fulwell Quarry SSSI.

6.434 The 4.34ha site is located in an elevated position on the north western edge of Fulwell. The western section of the site consists of Playing fields forming part of Fulwell Quarries Recreational site and is relatively level in nature, to the east end the land slopes downward toward to the north and east. The site is immediately bounded by a golf driving range to the north, Newcastle Road to the east with residential communities beyond, an unadopted highway and tree belt to the south with a car

Justification for removing site from the Green Belt

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[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5 Sunderland Publication Draft CSDP Sustainability Appraisal incorporating SEA \(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5%20Sunderland%20Publication%20Draft%20CSDP%20Sustainability%20Appraisal%20incorporating%20SEA%20(2018).pdf?m=636802911436500000)

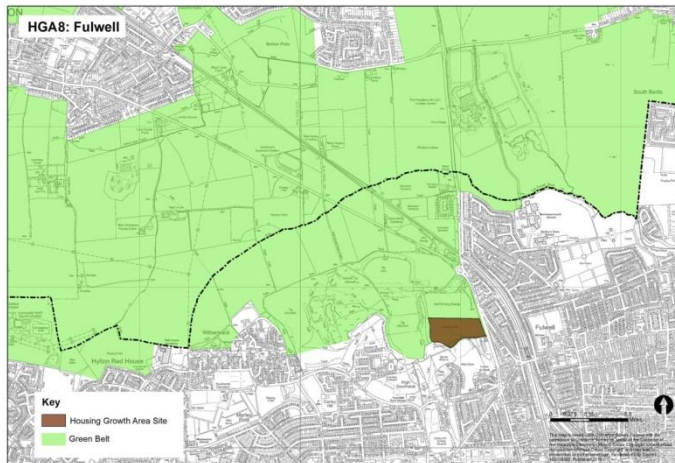


Figure 22 HGA8

6.435 The site was first put forward by the Council in 2016 and assessed in the 2017. As the site is part of the Green Belt, the site was considered a every stage of the Green Belt Review. The following summarised the outcomes of each stage of the assessment:

- **2016 Green Belt Review Stage 1 (SD.29)**¹⁸⁹ recommended that the area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p17).

- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)**¹⁹⁰ found that the land did not impact on Category 1 designations, and so the site was put forward to be considered at Stage 3 Site Selection (p57-58). This Assessment also included a call-out-for-sites assessment, which also recommended that the full area be considered at Stage 3 (p177).
- **Stage 3 Green Belt Site Selection Report (SD.31)**¹⁹¹ concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p43-44).
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34)**¹⁹² concludes that the northern boundary of the site would require enhancement in the form of additional dense vegetation and/or trees in order to create a more robust, defensible new Green Belt boundary (see pages 15-17).

6.436 Overall, there are no major adverse impacts, and this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl and countryside encroachment. Nevertheless, the site is bounded by development to the north and south and has a distinct urban fringe feel.

Allocation of HGA9

6.437 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development, the Council has prepared Development Frameworks which includes:

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- A parameter plan, which identifies how the constraints could be addressed and confirms the capacity of each site.

¹⁸⁹ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage \(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29%20Green%20Belt%20Review%20Stage%201%20Core%20Strategy%20Growth%20Options%20Stage%20(2016).pdf?m=636802951913330000)

¹⁹⁰ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

¹⁹¹ [https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

¹⁹² <https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018->

[/pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-9430000)

6.438 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the Developer, Policy SS7 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.439 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 80 units.
Mix of Family homes	The SHMA recognises the lack of suitable family homes in the city. The Plan promotes a mix of homes across the city, but it is expected that Greenfield sites, such as HGA8 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (see p8-10) (SD.62)¹⁹³ considers the full impact of the 2 HGA sites on primary and secondary schools in North Sunderland. The Housing Growth Areas within North Sunderland will generate an additional 44 primary school places and 23 secondary places. Overall (taking all residential development into account), there will still be a surplus of Primary School places in the North area, but there will be a particular shortage around Southwick (as a result of the scale of development focused in this area) and as such a new Primary School is required.</p> <p>There may be a deficit in secondary school places, but an existing secondary school could be extended to accommodate the shortfall.</p> <p>Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan and has consulted with health partners in order to identify future needs.</p> <p>CSDP Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>
Local Facilities	The site lies alongside Newcastle Road, which provides regular bus services to Sunderland City Centre and to South Tyneside. Local facilities are nearby in Fulwell.
Greenspace improvements	<p>The site currently comprises community playing fields and greenspace. The site forms the southern boundary of the strategic green infrastructure corridor west-east between Sunderland and South Tyneside. The area fares poorly in terms of amenity greenspace with below average quantum's in the area, this is somewhat because parcels of greenspace in the locality have been categorised as a different typology. For instance Fulwell Quarries, which lies adjacent to the site, provides over 50ha of greenspace and is identified as natural greenspace and sports pitches. Rights of Way thread through the wider Fulwell Quarries area. A Golf Driving Range exists to the east of the site.</p> <p>The 2018 Greenspace Report indicates that the area is shown to have very high levels of amenity greenspace. The loss of greenspace within the neighbourhood can be offset by the enhancement to the wider Fulwell Quarry area, which is proposed for upgrading into a country park.</p>

¹⁹³ [https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

<p>Ecological improvements</p>	<p>An urban fringe site that comprises community playing fields and greenspace, grassland and scrub, within or buffering Strategic Wildlife Corridors and Green Infrastructure Corridors. Sunderland’s N2K sites are less than 6km to the east, therefore impacts on these and the Durham Coast SSSI must be considered and addressed. Other nearby designated sites of nature conservation importance include Fulwell and Carley Hill Quarries Site of Special Scientific Interest (SSSI), Fulwell Quarry Local Nature Reserve (LNR) and Fulwell Meadows Local Wildlife Site (LWS). There are a number of potential protected and priority species associated with this site and surrounding area, such as breeding and wintering birds.</p> <p>An Ecological Assessment has been prepared for the proposed site, which recommends a number of specific mitigation measures in relation to scheme design. Most significantly, the 500m proximity of the site to Fulwell & Carley Hill Quarries SSSI, Fulwell Quarry LNR and Fulwell Meadows LWS lie within 500m of the proposed site, and a lack of alternative recreational facilities will likely result in an increased in visitor pressure, particularly dog walkers, to these sites, resulting in a sustained negative impact upon them. Mitigation and compensatory measures will be provided under Section 106 of The Town and Country Planning Act 1990¹⁹⁴, as amended.</p> <p>The site is supported by an HRA which identifies necessary mitigation measures.</p>
<p>Flood risk</p>	<p>A preliminary drainage report has been prepared by the Council. The report demonstrates that there are a number of options for the disposal of surface water from the site to either the Highway Drainage system or the combined sewer network in Newcastle Road. In accordance with national and local policy, surface water runoff rates from the site will be restricted to the current greenfield runoff rates via a complex flow control device. The greenfield runoff rates will be confirmed once a geoenvironmental report has been prepared for the site. In accordance with proposed local policy, source control will be utilised to improve the water quality of the runoff leaving the site. The peak foul water loading from the development can use the 225 mm diameter combined sewer in Newcastle Road.</p>
<p>Accessibility and Transport</p>	<p>The site is located immediately to the west of Newcastle Road (A1018) which provides links to Sunderland City Centre and South Tyneside. The site is currently accessed via an unadopted highway to the south of the site which is also used to access the allotments further south.</p> <p>The site has excellent public transport connections with two bus stops within 400m of the site with connections to Sunderland city centre, Durham and Gateshead. The Tyne and Wear Metro station is located approximately 300m to the south east of the site and provides frequent connections to Sunderland and Newcastle.</p> <p>There are no public rights of way or cycle routes through the site however a route runs along the southern boundary and there are several within the wider area.</p>
<p>Access</p>	<p>Upgrading vehicular access to the site from Newcastle Road.</p>

¹⁹⁴ “Town and Country Planning Act 1990”, HM Government. <https://www.legislation.gov.uk/ukpga/1990/8/contents>

Reasonable Alternatives

The proposed allocation of Green Belt housing release sites within the North Sunderland area has followed a Green Belt Review and site selection process as detailed in Appendix F. This concludes that the proposed allocations can and should be released from the Green Belt to contribute to meeting Sunderland’s objectively assessed housing need. Failure to release these sites would either result in Sunderland’s objectively assessed housing needs not being met or would require alternative and potentially less suitable areas of Green Belt land to be released for housing.

Effective Deliverable

6.440 The policy will be delivered through the submission of planning applications by housing developers and the Council and their determination by the Local Planning Authority. The Viability Assessment Typology within the Whole Plan Viability Assessment (2017)¹⁹⁵ indicates that Greenfield sites are likely to be viable.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS4	North Sunderland Housing Growth Areas	Identifies the Housing Growth Areas in North Sunderland and what is expected to be provided/achieved by them	<ul style="list-style-type: none"> Failure to provide a mix of housing types Failure to secure contributions for education and healthcare provision 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Review of land allocated for development Negotiation with developers to ensure delivery of appropriate housing mix Potential review of the Plan/Policy Review of s106 contribution collection process/Planning Obligations SPD 	<ul style="list-style-type: none"> Housing completions within each HGA Developer contributions collected in each HGA Housing mix in each HGA 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications SHLAA

Consistent with national policy

6.441 By allocating these sites for housing the plan is managing the patterns of growth within the city to make the fullest possible use of public transport and focus significant development in locations that can be made sustainable (Paragraph 17 of the NPPF). The policy is also ensuring that the required infrastructure is provided for the site.

SP5 South Sunderland

6.442 This policy sets out the spatial priorities for South Sunderland by focussing economic growth in identified employment areas and at the Port of Sunderland; allocating South Sunderland Growth Area; identifying regeneration and renewal areas; and protecting Settlement Breaks.

¹⁹⁵ [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017.pdf?m=63680311173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017.pdf?m=63680311173630000)

Positively Prepared Vision and Strategic Priorities

6.443 The policy will assist in the delivery of the vision by helping to ensure that the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities; is open and responsive to the changing needs and demands of our growing economy; creates new and diverse job opportunities particularly in advanced manufacturing; and has a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all.

6.444 Policy SP5 will help to deliver Strategic Priorities 2, 4, 5 and 8.

Draft Plan Comments

6.445 This is a new policy, so no previous comments have been received.

How Issues Have Been Taken into Account at Publication Draft

6.446 This is a new policy, so no previous comments have been received.

Publication Draft Comments

6.447 As set out in the consultation statement, the following issues were raised during Publication Draft consultation:

- A resident expressed concerns over housing development in South Hylton (PD419);
- Burdon Lane Consortium supports the policy (PD2074). Persimmon Homes support the SSGA, but object to the inclusion of the Hendon Paper Mill site as an employment area. They consider that residential use is appropriate on this site (PD3923). Paul Mackings Consulting Ltd would also like the site to be removed as an employment allocation and used for housing (PD2916);
- Hellens Land Ltd support the policy overall, but would also like their land at Hastings Hill to be removed from the Green Belt and allocated for housing (PD4857).

How Issues Have Been Taken into account prior to Submission

6.448 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. With regards to the Hendon Paper Mill site (PD3923), as set out in the Plan (SD.1¹⁹⁶) and this Compliance Statement, the site is required to ensure an adequate supply of employment land within Sunderland over the Plan period. The Council has considered the site at Hastings Hill (PD4857) but consider that due to the impact on the purposes of the Green Belt it is not appropriate to remove this site from the Green Belt.

Proposed Modifications to the Publication Draft

6.449 The following modification is proposed to the Publication Draft:

Policy/ Para/ Figure	Proposed Change	Justification
Figure 26	Replaced map, amended key	For clarity

Duty to Cooperate

6.450 No duty to cooperate issues identified.

¹⁹⁶ https://www.sunderland.gov.uk/media/20849/SD-1-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft/pdf/SD.1_Core_Strategy_and_Development_Plan_2015-2033_Publication_Draft.pdf?m=636803778731670000

Sustainability Appraisal (2017)

6.451 This is a new policy so was not assessed as part of the Sustainability Appraisal (2017) (SD.12¹⁹⁷).

Sustainability Appraisal (2018)

6.452 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA (SD.6¹⁹⁸).

Justified

- 6.453 The policy provides an overarching spatial strategy for the sustainable growth of the Sunderland South sub-area. It identifies more detailed policies and site specific allocations within the Plan that will assist in achieving the overarching strategy for the area.
- 6.454 The Sunderland South sub-area contains a wide range of existing industrial areas, including the older industrial areas along the southern bank of the River Wear, along the coast at Hendon and traditional industrial estates such as Pallion, but also includes modern business parks such as Doxford International. Whilst the majority of these industrial areas are developed, there are development opportunities available within them and previously developed land is being cleared and made available for redevelopment, therefore these areas will continue to be safeguarded for business and general industrial use under Policies EG1 and EG2. The areas safeguarded are broadly consistent with the recommendations set out within Appendix 3 of the Sunderland Employment Land Review (2016)(SD.37¹⁹⁹)
- 6.455 The Sunderland South sub-area also contains the Port of Sunderland. The Council will continue to support economic growth within the port, particularly for port-related development. The Port of Sunderland is designated on the proposed Policies Map and Policy SS5 provides further detail on the types of development which would be appropriate.
- 6.456 The SSGA has been identified as a potential strategic growth area for housing within the city for a number of years. Whilst the vast majority of the housing allocations within the Plan will be identified through the Allocations and Designations Plan, the SSGA will deliver approximately 3,000 dwellings in total, with approximately 2,285 of these expected to be completed within the Plan period. The SSGA is therefore fundamental to the delivery of the housing requirement and has been identified as a strategic site allocation within the Plan.
- 6.457 The SSGA comprises of four individual sites; Chapelgarth, Cherry Knowle, Land at South Ryhope and Land North of Burdon Lane. The SSGA takes forward two unimplemented extant residential allocations (Chapelgarth and Cherry Knowles) from the current UDP and groups them together along with an unimplemented employment allocation (South Ryhope), which in accordance with the Employment Land Review (SD37²⁰⁰) is no longer required for employment purposes and a site (Land North of Burdon Lane) proposed to be de-allocated from the Settlement Break. The Settlement Break Review (SD48²⁰¹) identified that, provided adequate mitigation was in place, development could be accommodated

¹⁹⁷ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

¹⁹⁸ https://www.sunderland.gov.uk/media/20852/SD-6-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-Non-Technical-Summary-2018-/pdf/SD.6_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_Non-Technical_Summ.pdf?m=636802912395830000

¹⁹⁹ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

²⁰⁰ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

²⁰¹ https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

within much of the South Sunderland break. Three of the sites already have full or outline planning permission for residential development. It is anticipated that an application for the remaining site will be submitted in the near future.

- 6.458 The Hendon area of the city has historically suffered from high rates of unemployment, a poor quality industrial environment, high crime rates, poor accessibility, poor health conditions and inadequate standards of housing. The main initiative that was put in place to assist in the regeneration of the area was 'Back on the Map', which was the delivery vehicle for the 'New Deal for Communities Programme' which operated between 2001 and 2011. During the ten years of the programme, the appearance of the area has visibly improved and the quality of life for those living and working in the area has been enhanced.
- 6.459 Although the Government funded 'New Deal for Communities' has now come to an end, 'Back on the Map' continue as a charity, committed to staying in the area and building on the legacy left by the programme. Over the years the Council has worked in partnership with 'Back on the Map' to regenerate the Hendon area and return long term problematic empty properties back into occupation, this continues to take place and as such the area has been identified as a regeneration/renewal area.
- 6.460 Millfield is an area of the city which, due to its location has historically been an area where students have resided, in traditional older cottage type properties. However, as the student market has gradually shifted to the Urban Core, landlords have struggled to re-let properties and as such the area has started to decline, with the number of empty properties increasing. Due to these issues, the Council has identified this as an area for regeneration and renewal and have started to put mechanisms in place to bring the empty properties back into use.
- 6.461 As part of Gentoo's regeneration and renewal programme, a large area of housing within the area was demolished in the mid 2000's. Due to a number of issues including viability the sites have not to date been redeveloped. A renewal plan and a Masterplan were prepared for the area, with the main objective being to ensure that Pennywell undergoes regeneration that delivers a sustainable community, which meets the needs and aspirations of the local community with the right type, mix and tenure of housing set within a safe, attractive environment, as such the area continues to be a focus for regeneration.
- 6.462 As set out in Policy SP1, the Spatial Strategy seeks to protect the Settlement Breaks in Sunderland. Historically, South Sunderland had 4 areas of Settlement Break: At Claxheugh, around High Newport, Elstob and Tunstall Hills; between Hollycarrside and Ryhope, and to the south of Doxford, Silksworth and Tunstall Bank Estate (which now forms the South Sunderland Growth Area- SSGA). The 2018 Settlement Break Review (SD.48²⁰²) fully investigates each of these areas and concludes that Claxheugh and the SSGA provide limited roles as Settlement Breaks, and are therefore no longer supported as such. However, the remaining two areas relate strongly to Settlement Break purpose (see Chapters 2 and 3, pages 19-36), and furthermore, adjoin to form an important Green Infrastructure corridor linking the coast to Tunstall Hills and into the heart of the city.
- 6.463 The 1998 Settlement Break boundary excluded certain areas that were deemed to already have sufficient UDP policy protection (often as protected greenspaces or protected wildlife sites). This, however, led to confusion as to what land was specifically classed as Settlement Break. The 2018 Settlement Break Review (SD.48) re-examined these areas in

²⁰² https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

terms of their purpose, and where justified, has proposed to extend the Settlement Break area. In South Sunderland, this includes extending the Settlement Break boundary to encompass the Tunstall Hills SSSI and Local Nature Reserve, the former Ryhope Golf Course site (natural greenspace), High Newport Dene woodland, and the Ryhope Reclamation (greenspace) site (see pages 171-172).

6.464 As discussed, Sunderland’s Settlement Breaks have been subject to considerable housing pressure. Of the UDP Settlement Break areas across the city, 160 hectares of land is identified for housing (either under construction for housing, with planning approval or considered developable in the SHLAA). The remaining areas perform a strong Settlement Break role in defining urban area boundaries, supporting urban regeneration and settlement character, and in many cases are affected by significant natural and physical constraints. The Council therefore consider it a sound approach to protect their future.

Reasonable Alternatives

6.465 The policy sets out the spatial distribution for growth in the Sunderland South sub-area. Development is prioritised to the most appropriate locations. South Sunderland Growth Area (SSGA) has been identified as a housing growth area within the city for a number of years.

6.466 In regards to an alternative approach, the Council could have considered reducing the number of Settlement Breaks or their size to accommodate needed housing development instead of proposing amendments to Green Belt boundaries. However, as outlined in Policy SP1, the Council consider the strategy towards housing development to be sustainable and sound. Releasing land in Settlement Breaks would ultimately result in more development in South Sunderland and the Coalfield area which would contradict the Council’s strategy to redress the imbalance in housing development. In addition, it would place additional pressure on existing infrastructure. The Council consider there are exceptional circumstances to amend the Green Belt to deliver future growth in a sustainable manner, as set out in the Exceptional Circumstances for Releasing Land from the Green Belt Report (SD.33²⁰³).

6.467 A number of alternative Settlement Break boundaries and Green Belt boundaries have been suggested and considered; these include:

Site	Justification for discounting approach
Land at Tunstall Hills/Elstob	As explained in the Settlement Break Review (SD.48 ²⁰⁴) (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 (SD.22c ²⁰⁵) 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

²⁰³ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

²⁰⁴ https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

²⁰⁵ https://www.sunderland.gov.uk/media/21007/SD-22c-Appendix-N-Sunderland-South-Site-Assessments/pdf/SD.22c_Appendix_N_Sunderland_South_Site_Assessments.pdf?m=636808161220570000

	city landmark. These are fundamental to the quality of the Green Infrastructure and wildlife corridor, and therefore to Settlement Break purpose.
HRS11 Land at West Park, Middle Herrington	The loss of greenspace is considered to be unacceptable and would compound the existing lack of available greenspace in the area. While the Greenspace Audit (SD.47 ²⁰⁶) identifies the neighbourhood as having slightly below average levels of greenspace, closer inspection of greenspace sites identified that the level of available amenity greenspace in Middle Herrington is actually very low. The wider neighbourhood identified within the Greenspace Audit includes numerous smaller sites located around Doxford International, which provide grass verges and planting areas but do not provide the variety and overall quality that West Park provides. These sites within Doxford International are of no value to the residential areas. Loss of West Park would have a significant adverse impact on greenspace availability, would remove the largest single site in the neighbourhood and would also lose features that are significant to local area character. Therefore the site is no longer supported (Green Belt Review Addendum 2018, p4)(SD32 ²⁰⁷).
Land to south of SSGA Site South of Ryhope	The Council's Green Belt Assessment Stage 1 Updated and Stage 2 report (SD.30 ²⁰⁸) 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.
Land at Hastings Hill and Middle Herrington	The Green Belt Boundary Review (SD.34 ²⁰⁹) (p35-36) 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." 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. 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.

Effective Deliverable

6.468 The policy will be delivered through the submission and determination of planning applications. Major housebuilders are in place to deliver the SSGA and three of the four sites already have the benefit of planning permission. The Council will work with partners

²⁰⁷ https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32_Green_Belt_Assessment_-_2018_Addendum.pdf?m=636802953199630000

²⁰⁸ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

²⁰⁹ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

including Homes England and Housing Associations such as Gentoo to facilitate the regeneration and renewal of Hendon, Millfield and Pennywell.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP5	South Sunderland	Sets out how South Sunderland will continue to develop	<ul style="list-style-type: none"> • Failure to secure renewal and regeneration at Hendon, Millfield or Pennywell • Significant amount of employment development outside of identified Employment Areas and The Port • Applications for development approved within Settlement Breaks 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Review of land allocated for development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications granted for regeneration and renewal at Hendon, Millfield or Pennywell • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas and The Port • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas and The Port • Number of new residential units completed; number of affordable homes completed; developer contributions collected; and housing mix delivered as part of the SSGA • Planning applications received/granted within Settlement Breaks 	<ul style="list-style-type: none"> • SCC Monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment • SSGA Monitoring

Consistent with National Policy

6.469 The Core Planning Principles set out in the NPPF (Para 17) state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SS5 The Port of Sunderland

6.470 The Port of Sunderland is one of the city's key economic assets and is a Key Employment Area for the city. This policy aims to ensure the provision of good road and rail links to the Port; prevent inappropriate development and support port-related employment uses within the area, whilst mitigating potential flood risk.

SS5 The Port of Sunderland

The Port of Sunderland, as designated on the Policies Map, will be reinvigorated through:

1. the provision of road and rail links suitable for heavy freight to link the Port to national networks;
2. preventing waterside developments that would negatively impact on operations;
3. supporting the use of the River Wear as a freight corridor and serving waterfront businesses;
4. enabling development of port related uses within Use Classes B1, B2 and B8, including offshore renewables and automotive supply chains; and
5. requiring development which is located within Flood Zones 2 and 3 to meet the sequential test and exceptions test, where necessary.

Positively Prepared

Vision and Strategic Priorities

6.471 The policy will assist in the delivery of the vision by helping to ensure that the city is open and responsive to the changing needs and demands of our growing economy; creates new and diverse job opportunities particularly in advanced manufacturing; and has excellent transport links and sustainable access for visitors, business and residents.

6.472 Policy SS5 will help to deliver Strategic Priorities 1, 2, 5 and 11.

Draft Plan Comments

6.473 As set out in the consultation statement, the following issues were raised during the draft Plan consultation:

- Residents and Highways England support the approach to the Port.
- South Tyneside Council raised concerns over the Port having an impact on the Port of Tyne.

How Issues Have Been Taken into Account at Publication Draft

6.474 The Council has held further discussion with South Tyneside in regards to the future uses of the Port. The Council will continue to work with the South Tyneside Council on this matter.

Publication Draft Comments

6.475 As set out in the consultation statement, the following issues were raised during Publication Draft consultation:

- Environment Agency advises that the Level 2 SFRA should be submitted as part of the evidence base (PD207).

How Issues Have Been Taken into account prior to Submission

6.476 The Council and the Environment Agency has agreed a Statement of Common Ground, which confirms that the Council will submit the SFRA Level 2 (SD.50²¹⁰) as part of the Submission Documents (PD07).

²¹⁰<https://www.sunderland.gov.uk/media/20891/SD-50-Sunderland-Flood-Risk-Policy-Level-2-Strategic-Flood-Risk-Assessment-Site-Screening-2018->

Proposed Modifications to the Publication Draft

6.477 No modifications are proposed to the Publication Draft.

Duty to Cooperate

6.478 South Tyneside Council made representations expressing concerns about potential impacts on the Port of Tyne. Both authorities have since held a meeting to discuss these concerns and it was agreed that the operations at the Port of Sunderland would be designed to be complementary to the Port of Tyne.

6.479 The Council have held meetings with the Environment Agency throughout the preparation of the Plan. In response to representations to the Draft Plan, site allocation boundaries were amended to exclude parts that fell within Flood Zones 2 and 3. An updated Level 1 SFRA (SD.49²¹¹) was completed to take account of these changes. In addition, the Council prepared a Level 2 SFRA for the Port of Sunderland (SD.50), at the request of the Environment Agency. The policy was also updated to indicate that any development within Flood Zones 2 and 3 will be required to meet the sequential and exceptions test, where necessary. The Council have signed a Statement of Common Ground with the Environment Agency (SD8k²¹²) which indicates which demonstrates agreement on the Plan, as submitted.

Sustainability Appraisal (2017)

6.480 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

6.481 The SA (SD.12²¹³) made no recommendation for changes to be made to the Draft Plan.

Sustainability Appraisal (2018)

6.482 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	++	++	+	++	++	~	~	+	++	~	++	++

6.483 The SA (SD.6²¹⁴) made no recommendation for changes to be made to the Publication Draft.

[/pdf/SD.50_Sunderland_Flood_Risk_Policy_Level_2_Strategic_Flood_Risk_Assessment_Site_Screening_\(2018\).pdf?m=636802968502500000](#)

²¹¹ [https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-/pdf/SD.49_Sunderland_City_Council_Level_1_-_Strategic_Flood_Risk_Assessment_\(2018\).pdf?m=636802962946400000](https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-/pdf/SD.49_Sunderland_City_Council_Level_1_-_Strategic_Flood_Risk_Assessment_(2018).pdf?m=636802962946400000)

²¹² https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

²¹³ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

²¹⁴ https://www.sunderland.gov.uk/media/20852/SD-6-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-Non-Technical-Summary-2018-/pdf/SD.6_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_Non-Technical_Summ.pdf?m=636802912395830000

Justified

- 6.484 The policy seeks to support the ongoing development of the Port of Sunderland. As there is a limited supply of land available within the port, the policy seeks to ensure that any development within the port estate is port-related development that is required to be there for operational reasons. Any non-port related industrial development will be directed to other designated employment areas.
- 6.485 It is however recognised that the Hendon Railway Sidings do not form part of the operational port; therefore non-port related B1, B2 and B8 uses will be supported on this site. The supporting text to the policy makes this clear. The area designated on the Policies Map (SD.2²¹⁵) is consistent with the allocation within the existing UDP and UDP Alteration No.2; however it does exclude part of the railway sidings, currently allocated for employment use through UDP Alteration No.2. Since this land was allocated for development, it has been identified as a candidate Local Wildlife site. The allocation has therefore been amended to exclude the areas of highest biodiversity value, which will be formally designated as a Local Wildlife Site in due course through the emerging Allocations and Designations Plan.
- 6.486 In order to address concerns raised by the Environment Agency the policy includes a requirement for any development within flood zones 2 and 3 to meet the sequential and exceptions test, where necessary.

Reasonable Alternatives

- 6.487 The Council gave consideration to permitting a wider range of employment uses within the Port of Sunderland, however as it is recognised that the supply of land within the port estate, especially that with waterside frontage is limited, development within the port estate should be restricted to port-related uses which require to be located there for operational reasons. This will ensure that non-port related development does not unnecessarily sterilise land, which could be required for port-related development in the future.
- 6.488 The supporting text to the policy recognises that the Hendon Railway Sidings site is located outside of the operational port and does not benefit from direct waterside access, therefore a wider diversity of employment uses would be supported on this site. The policy could have not distinguished between the uses appropriate on this site from other areas of the port, but due to the location of the railway sidings outside of the operational port, it was considered that this would unnecessarily constrain the potential uses on the Railway Sidings site. Furthermore, the Railway Sidings site has the benefit of Enterprise Zone status and the Council wish to support the development of the site for employment use.

Effective Deliverable

- 6.489 The policy will be delivered through the submission and determination of planning applications at the Port of Sunderland. The Port of Sunderland is owned and operated by Sunderland City Council and the Council therefore can contribute directly to the delivery of this policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
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²¹⁵

https://www.sunderland.gov.uk/media/20850/SD-2-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft-Policies-Map/pdf/SD.2_Core_Strategy_and_Development_Plan_2015-33_Publication_Draft_Policies_Map.pdf?m=636802910202830000

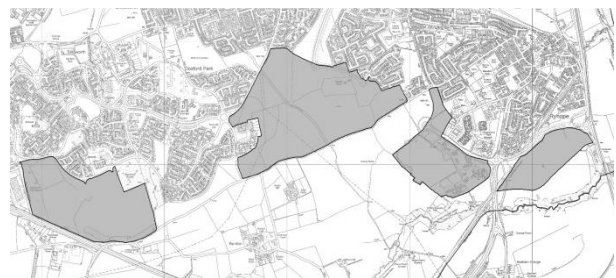
SS5	The Port of Sunderland	Sets out how the Port of Sunderland will be reinvigorated	<ul style="list-style-type: none"> • Failure to deliver road and rail links suitable for heavy freight to the Port • Significant waterside development impacting on Port operations • Significant lack in port-related development coming forward 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • New road and rail links to the Port permitted/delivered • Applications granted for waterside development • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within The Port • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within The Port 	<ul style="list-style-type: none"> • SCC Monitoring data • Planning applications • Port of Sunderland • Employment Land Review
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Consistent with National Policy

6.490 Paragraph 33 of the NPPF states that when planning for ports, plans should take account of their growth and role in serving business. The Port provides an important link internationally and nationally for businesses within the City and beyond and its development is important to the future prosperity of the City. The policy is consistent with the NPPF.

SS6 South Sunderland Growth Area

6.491 South Sunderland Growth Area informed by the SSGA SPD (SD.36²¹⁶), will provide well designed accommodation within easy reach of services and facilities, set amidst inclusive public realm and greenspace. Through the Infrastructure Delivery Schedule (SP.24²¹⁷), South Sunderland will be supported by the infrastructure necessary to create a sustainable, thriving community.



SS6 South Sunderland Growth Area

Sites within SSGA include Chapelgarth, Land North of Burdon Lane, Cherry Knowle and South Ryhope. These sites are allocated to create a new high quality, vibrant and distinctive neighbourhood. Development should deliver:

1. approximately 3000 new homes;
2. 10% affordable housing;

²¹⁶[https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_\(2017\).pdf?m=636802954886230000](https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_(2017).pdf?m=636802954886230000)

²¹⁷[https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_\(2016\).pdf?m=636803128597970000](https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_(2016).pdf?m=636803128597970000)

3. a new primary school and extensions to two existing schools;
4. a local centre;
5. community/cultural facilities;
6. large expanses of public open space;
7. woodlands;
8. cycleways and footpaths; and
9. the completion of the Ryhope-Doxford Link Road

Positively Prepared

Vision and Strategic Priorities

- 6.492 The policy will assist in the delivery of the vision by helping to ensure that the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities.
- 6.493 Policy SS6 will help to deliver Strategic Priorities 1, 2, 4, 8 and 11.

Draft Plan Comments

- 6.494 As set out in the consultation statement, the following issues were raised during the draft Plan consultation:
- Residents were concerned that development of SSGA:
 - Would increase traffic issues
 - Does not require a health centre
 - Does not require a bus only link road
 - Persimmon supports the policy but are concerned that the viability assessment has not assessed the highest quality design.
 - Barratt David Wilson Homes suggests that the policy is amended and only allocates the number of homes which will be delivered in the Plan period.
 - Bellway request that the Ryhope/Doxford road is included in the Plan.
 - Durham County Council would like to continue to work together to understand the impact of the site on rail network.
 - Northumbrian Water, Persimmon and Homes England support the policy.
 - Homes England suggests the removal of SHLAA site 674 from the Green Belt.
 - The Tyne and Wear Archaeologist requests that additional archaeology work will be required on site.
 - Siglion supports the sites.

How Issues Have Been Taken into Account at Publication Draft

- Concerns regarding the introduction of a bus only route will be considered as part of the SSGA SPD(SD.36²¹⁸), which proposed the restrictions.
- The supporting text to the policy has been amended to indicate that the Council expects the scheme to be of high quality design, rather than the highest quality.
- The Council has had further discussion with Durham County Council and will continue to work together to minimise the impacts of the development.
- The supporting text has been amended to state how much development is expected during the Plan period. This is also reflected in the Plan's trajectory.
- Stage 1 and 2 Green Belt Reviews (SD.30²¹⁹) show that removal of Site 674 from Green Belt would have a moderate overall adverse impact to Green Belt purpose. The Green Belt

²¹⁸[https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_\(2017\).pdf?m=636802954886230000](https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_(2017).pdf?m=636802954886230000)

²¹⁹[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

Boundary Review (SD.34²²⁰) also recommends that the current boundaries are strong and durable and should remain. Therefore the site is recommended to remain in Green Belt.

- Further archaeological work has been undertaken at sites across the SSGA as planning applications have been considered and determined.

Publication Draft Comments

6.495 As set out in the consultation statement (SD.7²²¹), the following issues were raised during Publication Draft consultation:

- Burdon Lane Consortium, Bellway Homes and Persimmon Homes support the policy (PD2236, PD1824 & PD3943). In addition, Burdon Lane Consortium expresses concerns that requiring all development to accord with the SSGA SPD may affect site viability and believe that the entire allocation could be developed within the Plan period (PD2257 & PD2267). However, Bellway Homes would like the alignment of the Ryhope-Doxford Link Road to be moved. Barratt David Wilson Homes advise that the plan should account for a slower delivery rate for the SSGA (PD5361);
- A local landowner supports the policy (PD1580). Church Commissioner for England support the policy, but feel that a larger site should be allocated to the south of Ryhope (PD5243);
- Sunderland Civic Society and Karbon Homes suggest that the affordable housing requirement should be increased to 15% (PD904 & PD3383);
- Historic England supports the policy (PD96). Highways England considers that additional modelling work is required (PD4845). Durham County Council advise that previously raised highways issues have now been resolved (PD1388);
- Two residents object to the allocation as there are numerous brownfield sites available and because of the increased traffic (PD988 & PD991). Sunderland Civic Society consider that the allocation is not required, as the scale of development proposed is overstated (PD921). A resident supports the proposed alignment of the Ryhope-Doxford link road (PD4169).

How Issues Have Been Taken into account prior to Submission

6.496 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council considers that the build out rates are consistent with the SHLAA, which was prepared with input from the development industry. In response to the issues raised in regards to infrastructure and affordable homes, an Infrastructure Delivery Study (SP.24²²²) and Viability Assessment (SP.25²²³) have been undertaken for the SSGA. Due to the significant levels of infrastructure required, there is a lower affordable housing requirement to ensure the site remains viable. Furthermore, three of the four sites already have planning permission with agreements in place for 10% affordable housing. The Ryhope-Doxford link road is consistent with that contained within the existing UDP and the draft SSGA SPD (SD.36²²⁴). The final alignment will be subject to detailed survey work and design.

²²⁰ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-(2018).pdf?m=636802954099430000)

²²¹ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-CSDP-Consultation-Statement-\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-CSDP-Consultation-Statement-(2018).pdf?m=636807351626400000)

²²² [https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-\(2016\).pdf?m=636803128597970000](https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-(2016).pdf?m=636803128597970000)

²²³ [https://www.sunderland.gov.uk/media/21005/SP-25-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-Viability-Assessment-2014-/pdf/SP.25_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_-_Viability_Assessment_\(2014\).pdf?m=636808144996800000](https://www.sunderland.gov.uk/media/21005/SP-25-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-Viability-Assessment-2014-/pdf/SP.25_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_-_Viability_Assessment_(2014).pdf?m=636808144996800000)

²²⁴ [https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-Draft-South-Sunderland-Growth-Area-SPD-\(2017\).pdf?m=636802954886230000](https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-Draft-South-Sunderland-Growth-Area-SPD-(2017).pdf?m=636802954886230000)

Proposed Modifications to the Publication Draft

6.497 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
SS6	7. <u>ecology</u> wøødlands;... 10. <u>public transport</u>	For clarity

Duty to Cooperate

6.498 Through their comments on the Draft Plan, Durham County Council indicated that they wished to understand the potential transport impacts of the SSGA on the local road network in Durham County. Meetings were held to discuss the impacts and it was acknowledged that three of the four SSGA sites already had planning permission and that Durham County Council had been consulted on these applications. As a result of these discussions, planning contributions have been agreed for improvements to the road network within County Durham.. Sunderland City Council will continue to liaise with Durham County Council as proposals for the SSGA come forward. The Council's will also work together to bid for funding to secure improvements to the highway network within this area.

Sustainability Appraisal

10. The SSGA has been subject to its own Sustainability Appraisal as part of the preparation of the SSGA SPD (SP.29²²⁵).

Justified

6.499 The SSGA has been identified as a potential strategic growth area for housing within the city for a number of years. Whilst the vast majority of the housing allocations within the Plan will be identified through the Site Allocations and Designations Plan, the SSGA will deliver approximately 3,000 dwellings in total, with approximately 2,285 of these expected to be completed within the Plan period. The SSGA is therefore fundamental to the delivery of the housing requirement and has been identified as a strategic site allocation within the Plan.

6.500 The SSGA comprises of four individual sites; Chapelgarth, Cherry Knowle, Land at South Ryhope and Land North of Burdon Lane. The SSGA takes forward two unimplemented extant residential allocations (Chapelgarth and Cherry Knowle) from the current UDP and groups them together along with an unimplemented employment allocation (South Ryhope), which in accordance with the Employment Land Review (SD.37²²⁶.) is no longer required for employment purposes and a site (Land North of Burdon Lane) proposed to be de-allocated from the Settlement Break. The Settlement Break Review (SD.48²²⁷) identified that, provided adequate mitigation was in place, development could take place within much of the South Sunderland break. Three of the sites already have full or outline planning permission for residential development. It is anticipated that an application for the remaining site will be submitted in the near future.

²²⁵https://www.sunderland.gov.uk/media/20929/SP-29-South-Sunderland-Growth-Area-Draft-Supplementary-Planning-Document-Sustainability-Appraisal-2016-/pdf/SP.29_South_Sunderland_Growth_Area_-_Draft_Supplementary_Planning_Document_-_Sustainability_Appraisa.pdf?m=636803131533430000

²²⁶[https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-/pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

²²⁷https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

- 6.501 The SSGA has the potential to provide significant numbers of much needed larger family homes and executive dwellings. The SHMA (SD.23²²⁸) identifies a need to increase the number and range of housing within the city, which reflects underlying aspirations and will help to prevent out migration, much of which is due to a lack of appropriate housing within the city. The SHMA identifies a particular need for more executive housing and larger family dwellings, 3, 4 and 5+ bedroom within the city. The SSGA seeks to address this imbalance.
- 6.502 The Plan anticipates that over 75% of the 3000 homes will be delivered during the Plan period. This is considered a realistic approach given the quantum of development and the potential number of developers on site at any one time. It is anticipated that the build 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.
- 6.503 To support the comprehensive development of the SSGA, the Council has prepared a draft Supplementary Planning Document (SPD) (SD.36²²⁹). The SPD provides further information about SSGA and its context, sets out the Council's visions and aspirations for the area and makes clear what the Council's expectations are for any further development proposals to ensure that SSGA is a high quality, vibrant and distinctive neighbourhood which is well integrated with surrounding communities.
- 6.504 Due to the scale of the development, the SSGA offers the opportunity to create a new sustainable community supported by a range of new infrastructure. An Infrastructure Delivery Study (IDS)(SP.24²³⁰) has been prepared to guide the future development of the area. The IDS identifies the need for significant infrastructure. Infrastructure required includes; affordable housing, a new primary school, extensions to two nearby existing primary schools, a local centre, leisure facilities, community/cultural facilities, over 50 ha of greenspace, allotments, biodiversity mitigation, subsidised bus, extensive cycleways and footpaths, the completion of the Ryhope Doxford Link Road (RDLR) and Habitat Regulations mitigation. Most infrastructure costs have been apportioned on a per dwelling basis. All S106s have been agreed to by those developments that have planning permission.
- 6.505 The delivery of infrastructure is on programme with the two school extensions already having planning approval and a planning application currently being prepared for the Ryhope Doxford Link Road, due to be submitted early 2019. In partnership with HE, the Council have secured £1.4 million Growth and Housing Fund, matched with £500,000 Council capital funding to provide improvements to the A19/A690 junction to mitigate for the impacts of the SSGA. In addition, the Council are preparing a £20 million MHCLG Forward Funding bid, to be submitted March 2019, to facilitate infrastructure provision. The bid seeks funding for further improvements to the A19/A690 junction, the Seaton Lane Junction in Durham and improvements to a section of the city's local road network to further mitigate for the SSGA. There are no anticipated problems/delays to the infrastructure delivery timetable.

²²⁸[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

²²⁹[https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_\(2017\).pdf?m=636802954886230000](https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_(2017).pdf?m=636802954886230000)

²³⁰[https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_\(2016\).pdf?m=636803128597970000](https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_(2016).pdf?m=636803128597970000)

- 6.506 The affordable housing contribution for the SSGA is set at 10%. An Infrastructure Delivery Study) (SP.24²³¹) and viability assessment (SP.25²³²) 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 South Sunderland Areas of Additional Natural Greenspaces (SSAANGS) is being sought from the four development sites. Increasing the affordable housing requirement would threaten viability. Three of the four sites already have planning permission and agreed to a contribution of 10% affordable housing. The permissions pre-dated the increase in affordable housing ask to 15% within the Plan.
- 6.507 Sunderland has a number of European Designations within its boundary; as such a Habitat Regulations Assessment (HRA) (SP.23²³³) has been undertaken for the SSGA. The HRA has informed the approach taken forward in the SPD, proposing a mix of South Sunderland Areas of Additional Natural Greenspaces (SSAANGS) and Suitable Access Management Mitigation (SAMM). The HRA concludes that if the proposed mitigation measures are implemented then the development of SSGA will not have any Likely Significant Effects on the nearby SPA and SAC.

Reasonable Alternatives

- 6.508 No reasonable alternatives identified. Most of the sites already have the benefit of planning permission and the whole of the SSGA development is required to fund the necessary level of infrastructure. Without SSGA further Green Belt deletions would have to be proposed to meet the city's future housing needs

Effective Deliverable

- 6.509 The policy will be delivered through the submission and determination of planning applications. Volume housebuilders either own or have options on the sites and are committed to the delivery of the SSGA. The delivery of the SSGA will be ensured through the SPD (SD.36²³⁴), which will be updated during the EIP process and adopted as and when the Plan is adopted.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS6	South Sunderland Growth Area	Identifies the sites that make up the South Sunderland Growth Area and	<ul style="list-style-type: none"> Significant shortfall in number of new homes delivered 	<ul style="list-style-type: none"> Identify reasons for lack of development Negotiation 	<ul style="list-style-type: none"> Housing completion s on each site Number of 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications

²³¹ [https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_\(2016\).pdf?m=636803128597970000](https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_(2016).pdf?m=636803128597970000)

²³² [https://www.sunderland.gov.uk/media/21005/SP-25-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-Viability-Assessment-2014-/pdf/SP.25_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_-_Viability_Assessment_\(2014\).pdf?m=636808144996800000](https://www.sunderland.gov.uk/media/21005/SP-25-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-Viability-Assessment-2014-/pdf/SP.25_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_-_Viability_Assessment_(2014).pdf?m=636808144996800000)

²³³ https://www.sunderland.gov.uk/media/20923/SP-23-South-Sunderland-Growth-Area-Draft-Supplementary-Planning-Document-HRA-Appropriate-Assessment-2016-/pdf/SP.23_South_Sunderland_Growth_Area_-_Draft_Supplementary_Planning_Document_-_HRA_Appropriate_Assessm.pdf?m=636803128078270000

²³⁴ [https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_\(2017\).pdf?m=636802954886230000](https://www.sunderland.gov.uk/media/20879/SD-36-Draft-South-Sunderland-Growth-Area-SPD-2017-/pdf/SD.36_Draft_South_Sunderland_Growth_Area_SPD_(2017).pdf?m=636802954886230000)

		what is expected to be provided/achieved by them	<p>compared to Policy aim</p> <ul style="list-style-type: none"> • Failure to deliver 10% proportion of affordable units • Failure to deliver new primary school • Failure to deliver extensions to existing schools • Failure to deliver new local centre • Failure to deliver Ryhope-Doxford link road 	<p>with developers to ensure delivery of appropriate housing mix.</p> <ul style="list-style-type: none"> • Potential review of the Plan/Policy • Review of s106 contribution collection process/Planning Obligations SPD 	<p>affordable homes completed on each site</p> <ul style="list-style-type: none"> • Developer contributions collected on each site • Housing mix on each site • Delivery of local centre and community and cultural facilities 	<ul style="list-style-type: none"> • SHLAA • SSGA Monitoring
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Consistent with National Policy

6.510 The Core Planning Principles set out in the NPPF (Para 17) state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

6.511 This policy aims to support the sustainable growth of the Coalfield sub-area; protecting Open Countryside and Settlement Breaks from inappropriate development and allocating Housing Growth Areas.

The Coalfield

SP6 The Coalfield

The Coalfield character and settlement will be protected whilst ensuring its future sustainability. In order to achieve this:

1. the Open Countryside and Settlement Breaks will be protected from inappropriate development;
2. Housing Growth Areas at Penshaw, New Herrington and Philadelphia (Policy SS7) are allocated to ensure there is land for the future growth of The Coalfield;
3. existing Travelling Showpeople sites will be safeguarded and new sites allocated (Policy H4);
4. economic development will be focussed on identified Employment Areas (Policies EG1 and EG2);
5. Houghton Town Centre will be the focus for office, retail and Main Town Uses. Any development within the Centre should enhance its vitality and viability; and
6. the Council and its partners will work to secure regeneration and renewal at Hetton Downs.

Positively Prepared

Vision and Strategic Priorities

6.512 This policy will assist in the delivery of the vision by helping to ensure that the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities; is open and responsive to the changing needs and demands of our growing economy; creates new and diverse job opportunities particularly in advanced

manufacturing; and has a network of green infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all.

6.513 Policy SP6 will help to deliver Strategic Priorities 2, 4, 5, 6 and 8.

Draft Plan Comments

6.514 This is a new policy, so no previous comments have been received.

How Issues Have Been Taken into Account at Publication Draft

6.515 This is a new policy, so no previous comments have been received.

Publication Draft Comments

6.516 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Hellens broadly support the policy but oppose the inclusion of Settlement Breaks and suggest that their site at Broomhill is removed from the Settlement Break (PD4667). Persimmon Homes object to Settlement Breaks and request that their site within the Newbottle/Sedgeleth sub area is removed from the Settlement Break (PD3935). Wynyard Homes would like their site at Quarry House Lane to be removed from the Settlement Break (PD4695);
- Esh Developments support the policy, particularly site HGA11. Agree that amendments to the Green Belt are required to support sustainable growth (PD1872). Taylor Wimpey generally supports the policy, but would like a minor boundary amendment to HGA9. Taylor Wimpey also suggests that their site east of Seaham Road is removed from the Green Belt (PD3507).
- Mr. Delaney suggested a number of modifications to the wording of the policy. Also requested that SHLAA site 468B is allocated for residential development (PD30).
- CPRE North East does not consider exceptional circumstances have been demonstrated for Green Belt release due to the housing requirement being above the standard methodology and proposals leading to weaker Green Belt boundaries. Proposals do not take account of proposed development on brownfield sites (PD1324). Sunderland Civic Society does not consider that Green Belt release is required as the housing requirement is over ambitious and unachievable (PD978).

How Issues Have Been Taken into account prior to Submission

6.517 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. A number of developers suggested alternative sites and boundaries have been suggested by landowners/developers. The Council has taken these into consideration. The Council has set out its justification for site selection and the spatial strategy in the compliance statement and considers the spatial strategy for distribution of housing in Sunderland to be justified as it seeks to readdress the imbalance of housing land across the city. The Settlement Break Report justifies the revised boundary for the Settlement Breaks and why it is not appropriate to remove alternative parcels of land.

6.518 The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper. The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

Proposed Modifications to the Publication Draft

Policy/ Para/ Figure	Proposed Change	Justification
Figure 29	Replaced map, amended key	For clarity

Duty to Cooperate

6.519 No duty to cooperate issues identified.

Sustainability Appraisal (2017)

6.520 This is a new policy and so was not assessed as part of the Sustainability Appraisal (SA) (2017) (SD.12²³⁵).

Sustainability Appraisal (2018)

6.521 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA. However the following recommendations were made for policy enhancements. The Council's response to these recommendations is set out below:

Recommendation	SCC Response
The inclusion of a minimum number of units to be allocated in the Coalfields Area through the future A&D Plan should be deleted from this policy, as this effectively sets a local housing target without it having been subject to capacity testing or SA. If a local housing target for the A&D Plan is established through the CSDP, this could affect future decisions regarding the acceptability of allocating specific sites within the A&D Plan.	Recommendation agreed and implemented.

Justified

- 6.522 The policy provides an overarching spatial strategy for the sustainable growth of the Coalfield sub-area. It identifies more detailed policies and site specific allocations within the plan that will assist in achieving the overarching strategy for the area.
- 6.523 The Coalfield area is unique and surrounded by environmental assets including Settlement Breaks and Open Countryside. These contribute to the Coalfields being identified as a collection of smaller settlements. As discussed in previous sections, the Settlement Breaks were designated in the UDP with the purpose of preventing the merging of communities. As discussed, the Council has reviewed the current function of all Settlement Breaks in the City.
- 6.524 Historically, the Coalfield had the largest concentration of Settlement Break areas in the city, located to the west of Newbottle or separating Houghton-le-Spring from Fence Houses and Hetton-le-Hole. The 2018 Settlement Break Review fully investigates each of these areas and concludes that in broad terms these Settlement Breaks should be retained, but with some area reductions necessary (see pages 48-170). The review also recommended extending the Settlement Break boundary to encompass Flint Mill greenspace site and Leyburn Grove recreation site (see pages 172-173).
- 6.525 Sunderland's Settlement Breaks have been subject to considerable housing pressure. Of the UDP Settlement Break area across the city, 160 hectares of land is identified for housing

²³⁵[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

(either under construction for housing, or with planning approval or considered developable in the SHLAA). The remaining areas perform a strong Settlement Break role in defining urban area boundaries, supporting urban regeneration and settlement character, and in many cases are affected by significant natural and physical constraints. Therefore the Council consider that is an appropriate strategy to continue to retain and protect Settlement Breaks in The Coalfields.

- 6.526 The Open Countryside identified on the Policies Map (SD02) has been designated to ensure the future sustainability and protection of the countryside and settlements within the Coalfield areas. The 2016 Strategic Land Review considered these areas (see Policy SP1) and demonstrated that all areas are remote and rural, with numerous physical and environmental constraints/features. These features help to create an overall area of higher landscape value and provide quality wildlife / Green Infrastructure corridors. Overall, they represent the least sustainable development areas in the city. A number of housing developments in recent years have been approved in the Open Countryside, which has resulted in the expansion of many settlements. The Council consider it appropriate to prevent the future expansion of these settlements with further incursion into the countryside. The NPPF recognises the important role the countryside plays and supports in protection and preservation.
- 6.527 The amount of residential development identified in the SHLAA (SD22) for the Coalfield area is high and it is acknowledged that there is concern that the local infrastructure may struggle to cope with additional housing. The natural environment is also increasingly being impacted upon, with concern about sites being located in close proximity to protected wildlife areas and impacting on green infrastructure corridors.
- 6.528 There are three Housing Growth Area identified in the Coalfield. As discussed in SP1, the Council in accordance with the NPPF undertook a full Green Belt Review. As part of this review, exceptional circumstances have been confirmed to be justified for the sites identified in the Coalfield Areas. HGA9 is the largest proposed sites and is consider be a sustainable location with limited impact to the overall Green Belt. The other two sites, HGA9 and HGA 10 are considered to be sustainable and suitable sites. HG9 will support the ongoing regeneration and redevelopment of the Philadelphia Complex. The site already has planning permission, but this extension into the Green Belt will enable comprehensive development of the site. HGA10 is the New Herrington Workingmens Club. This site has limited contribution to Green Belt purposes, but its redevelopment presents an opportunity to regenerate community facilities.
- 6.529 Hetton Downs was designated as a Housing Renewal Area following a Private Sector Housing Condition Survey in 2007, which highlighted it as being in an advanced stage of housing decline and contained some of the poorest housing in the city. Following this the Draft Preferred Option Hetton Downs Area Action Plan²³⁶ was published in 2007 to provide an area based framework to promote neighbourhood stability and strengthen the local Hetton community. The AAP was developed to guide the future regeneration of the area, through both investment and renewal to ensure the housing stock meet needs and aspirations. The AAP allocated land for new homes, new access road and proposed support for the retail area, development of leisure and recreational facilities, improved cycle and pedestrian routes and improvements in older, stable housing areas.

²³⁶ Insert link

- 6.530 The actions set out with the AAP are starting to be realised on the ground, with a number of new housing schemes developed. However, work is still on going and as such this Plan continues to assist in the areas regeneration and renewal.
- 6.531 The Coalfield subarea contains a number of employment sites which help to provide employment opportunities to local workers. The Council recognises the importance of retaining these employment areas in order to help sustain local communities and ensure economic growth opportunities within the Coalfield subarea are supported.
- 6.532 As the coalfield is characterised by a number of smaller settlements, there is a broad distribution of existing employment sites across the area. Many of these are long established employment locations with limited development opportunities, however Rainton Bridge South is a relatively new business park which offers large scale plots within a business park environment. In recent years a number of former employment sites have been lost to alternative uses, such as land at Sedgelech Industrial Estate and therefore it is important that the remaining sites are safeguarded for employment use. Policies EG1 and EG2 of the plan safeguard the remaining sites as Primary and Key Employment Areas. The areas safeguarded are broadly consistent with the recommendations set out within Appendix 3 of the Sunderland Employment Land Review (2016).
- 6.533 Houghton Town Centre represents the principal shopping destination within the Coalfield subarea and is recognised as such, through its designation as a 'town centre' within the retail hierarchy set out within Policy VC1. The town centre contains a range of shops and services and is accessible by a range of bus services. Houghton Town Centre will continue to be the focus for the development of Main Town Centre uses within the Coalfield subarea.

Reasonable Alternatives

- 6.534 The Policy designates Settlement Breaks and Open Countryside. The Council consider that the boundaries in the Plan are justified, however a number of alterativeds have been suggested as summarised below.

Field Parcel 5(SHLAA site 144)	Parcel 5 (see Settlement Break Review 2018, page 86) –should not be included in the Settlement Break as the NPPF does not endorse Settlement Breaks and the Policy is overly restrictive, precluding sustainable development sites from coming forward. 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, Shiney 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
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	<p>infrastructure funding, particularly in relation to highways and schools.</p> <p>As explained in the narrative to Policy SP1 (above), Settlement Breaks have strong links to the NPPF.</p>
<p>Land at Coaley Lane, (Site 385)</p>	<p>The site forms a smaller portion of land than the much larger field parcel that has been considered in the Settlement Break Review (parcel 2, see page 86) or in the SHLAA (Site 385 -see SHLAA Appendix P Coalfield Site Assessments Report, pages 121-123). 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 and achievability. It is 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 shafts that may require significant mitigation, as well as the site lying within a Critical Drainage Area and abounding Flood Zone 2.</p>
<p>Land to the south of Hutton Close, Houghton-le-Spring</p>	<p>The developer considers that the site could be developed without compromising the function and purpose of the Settlement Break, especially given that the site is screened. The development could enhance the wildlife corridor and landscape, and gap between Chilton Moor and the Industrial Estate.</p> <p>The Council does not support the 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. 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.</p>
<p>Land to the north of Broomhill Estate SHLAA site 536</p>	<p>The developer consider that the Settlement Break policy is a restrictive policy which is not prescribed in national policy. The Council considers that (SHLAA site 536) would fundamentally impact on Settlement Break. As explained in the Settlement Break Review (Chapter 16) this site (represented by field parcel 2)</p>

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.

Land to the north of Hetton Bogs(SHLAA site 181)

The Developer states that the Council has not considered fully all other options as required by NPPF paragraph 137 and that the Green Belt sites put forward for housing release cannot demonstrate very special circumstances to justify the amendment of the Green Belt boundary. The site to the north of Hetton Bogs should no longer be part of the Settlement Break and can be developed with appropriate mitigation.

The Council considers that the development would have a 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.

Land to the southeast of East Rainton

Wynyard Homes objects to the policy as they are concerned that the Council is over relying on brownfield sites which may not come forward for development due to constraints. Wynyard Homes promote Quarry House Lane site as a potential housing development site. The site is considered to be sustainable and there are no adverse impacts which cannot be mitigated. 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.

Land off Mallard Way, Ryehill

Harworth Estates objects to the policy, stating that the site (consisting of agricultural land / paddocks) is incorrectly identified as open countryside- it is within the settlement boundary and is surrounded by built development. The plan has not been positively prepared and is not effective or justified, and conflicts with "supporting a rural economy". It concludes that housing on this site could be accommodate with the existing environment and built form along the southern edge of Fencehouses with limited adverse effects.

The Council does not support the site put forward by Harworth Estates 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.

Effective Deliverable

6.535 The policy will be delivered through the submission and determination of planning applications. The Council will work with partners including Homes England and Housing Associations

Monitored

Policy	CSDP	Policy	Trigger for	Potential	Monitoring Indicator	Data Source
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Ref	Policy	Objective	Action	Action or Contingency		
SP6	The Coalfield	Sets out how the Coalfields will be protected	<ul style="list-style-type: none"> • Significant increase in applications granted in areas of Open Countryside or settlement Break • Failure to deliver new homes within identified housing Growth Areas • Loss of existing Travelling Showpeople sites/plots • Significant amount employment development outside of identified Employment Areas • Significant amount of office, retail, and Main Town Centre development outside of the Houghton Town Centre • Failure to secure regeneration at Hetton Downs 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications granted in areas of Open Countryside and Settlement Break contrary to Policy advice • Housing completions and delivery within identified Housing Growth Areas • Plots created on allocated travelling showpeople sites • Travelling showpeople plots created on unallocated sites • Employment land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses within identified Employment Areas • Employment land (ha) and floorspace (sqm) lost to development for non-B Class uses within identified Employment Areas • Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed within Houghton town centre • Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in designated primary shopping areas of Houghton town centre • Percentage of primary frontages in non-A1 use in designated town centre • Length of primary frontages in A1, A2, A3 and A5 retail uses in Houghton town centre 	<ul style="list-style-type: none"> • SCC Monitoring data • Planning applications • Employment Land Review • Retail Health & Capacity Studies • Retail Needs Assessment

Consistent with National Policy

6.536 The Core Planning Principles set out in the NPPF (para 17) state that patterns of development should be actively managed to make the fullest possible use of public transport and focus significant development in locations which can be made sustainable. This is the main aim of this policy.

SS7 The Coalfield Housing Growth Areas

This Policy aims to support the sustainable growth of the Coalfield sub-area by allocating Housing Growth Areas and setting out a framework for their development.

SS7 The Coalfield Housing Growth Areas

Development of The Coalfield Housing Growth Areas should:

1. provide a mix of housing types with a focus on family homes;
2. address impacts and make provision or contributions towards education provision and healthcare;
3. enhance access to local facilities and services, and

HGA9 Penshaw should:

- i. deliver approximately 400 new homes;
- ii. create a new defensible Green Belt boundary to the north and east;
- iii. provide sensitive design to minimise the impact on the wildlife and GI corridors to the north and east, providing a buffer to Herrington Burn and protected species in particular;
- iv. 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;
- v. ensure that dwellings are designed to reflect the positive elements of the local vernacular and materials;
- vi. retain all healthy trees and hedgerows and provide large areas of greenspace through the centre of the site and in the south west corner, utilising the pylon buffer zone;
- vii. provide ecological improvements to support wildlife in these areas;
- viii. mitigate any surface water flooding impacts and incorporate appropriate water attenuation in relation to flood zones associated with Herrington Burn;
- ix. provide pedestrian/cycleway connections through the site and link to the routes in the Country Park and the wider area; and
- x. provide vehicular access via Chislehurst Road. Access from Chester Road will not be permitted. Various vehicular junctions in the vicinity of the site should be assessed, including Wensleydale Avenue, A183/Washington Highway and the A183/A19 junction.

HGA10 New Herrington should:

- i. deliver approximately 20 new homes;
- ii. create a new defensible Green Belt boundary to the south of the site;
- iii. incorporate the creation of a new club building and car park that would serve the community;
- iv. provide greenspace improvements to the adjacent park, as well as including changing facilities within the community building to support sports uses. The location of the new building and car park should be located appropriately to serve all uses;
- v. ensure that dwellings are designed to reflect the positive elements of the local vernacular and materials;
- vi. retain all healthy trees and hedgerows and protect trees with Tree Preservation Orders (TPO's);
- vii. ensure that opportunities to provide ecological improvements to support wildlife are incorporated into the scheme design;
- viii. mitigate surface water flooding on the southern edge of the site;
- ix. provide pedestrian/cycleway connections through the site, linking to the adjacent park; and
- x. provide an improved vehicular junction with B1286 and Langley Street

HGA11 Philadelphia should:

- i. deliver approximately 195 new homes;
- ii. create a new defensible Green Belt boundary to the east and south of the site;
- iii. provide sensitive design that relates to the development of the Philadelphia Complex by providing a buffer to the west between the residential development and the proposed commercial development and incorporates design that relates to the area's historic past including Newbottle Village Conservation Area, and Listed Building in the locality

- iv. be of high architectural quality to protect long distance views to the southern edge of the development from the south;
- v. provide greenspace on the northern edge of the site to provide a gas main easement and to mitigate the impacts of a natural swale and associated surface water flooding
- vi. provide greenspace buffers to the south and east of the site in order to support the adjacent wildlife and green infrastructure corridor and limit any impact on the areas landscape character;
- vii. protect the Local Wildlife Site located on the north eastern edge of the site and minimise impact on priority species and habitat in the locality;
- viii. provide pedestrian and cycle links through the site and along the southern and eastern boundaries to link to neighbouring residential areas and nearby parkland;
- ix. include vehicle access from the Philadelphia Complex redevelopment; and
- x. provide junction improvements if necessary to Coaley Lane/Houghton Road, A182/Front Street and A182/B1286 junctions.

Positively Prepared

Vision and Strategic Priorities

6.537 This policy will deliver the spatial vision and strategic priorities by; having vibrant, well supported, town, district and local centres that are places to meet as well as shop; offering a mix of good quality housing, both market and affordable of the types, sizes and tenures that meet the needs and demands of existing and future communities; and offering residents the opportunity to live in sustainable communities accommodating all ages and abilities.

6.538 Policy SS7 will help to deliver Strategic Priorities 1, 2 and 4.

Draft Plan Comments

6.539 As set out in the consultation statement, the following issues were raised during the draft Plan consultation:

HRS12 – Land adjacent to Herrington County Park

The Developer Taylor Wimpey supports the inclusion of the site and suggests the site could be increased to accommodate more homes than identified in the Plan.

Comments have also been received from Historic England welcoming the recognition of maximising views of Penshaw Monument but the development should not be to the detriment of the asset's setting.

The following comments were made by local residents and stakeholders and are specific to the site:

- Lack of public transport to and from the site
- No local facilities nearby
- Detrimental impact on semi – rural identity of the area
- No need for executive homes.

HRS13 – New Herrington Working Men's Club

New Herrington Workmen's Club and Institute support the inclusion of the sites in this policy.

The following comments were made by local residents and stakeholders and are specific to the site:

- Loss of parkland
- Should build on brownfield land rather than greenfield sites
- There are ownership issues on the site.

HRS14 – Land at Offerton

The developer supports the inclusion of the site in the Plan but suggests an alternative boundary and an additional site in the village.

The following comments were made by the local residents and stakeholders and are specific to the site:

- Development will affect the sewers
- The site will suffer from noise pollution from the A19 and the farm as well as dust
- Access to the site is poor
- Design of the new dwellings needs to take the existing dwellings into account.

HRS15 – Land to the south of Philadelphia Complex
Persimmons support the inclusion of Philadelphia.

The following comments were made by local residents and stakeholders and are specific to the site:

- Too much development in the Coalfield recently
- Detrimental impact on neighbouring properties at Graswell
- Extends the site southwards towards Newbottle
- The area is run down and would benefit from regeneration
- This site was considered by Government “not to develop” so what has changed.

How Issues Have Been Taken into Account at Publication Draft
6.540 The issues raised have been addressed:

HRS12 – Land adjacent to Herrington County Park

- The main concern raised regarding this site was the impact that the development would have on the character of the area and the loss of open space. However as the land is privately owned there would be no loss of amenity green space as it is not used by the public and sensitive design can enable the site to blend with the local landscape and enable suitable buffers to Herrington Burn and Herrington Country Park.
- A Transport Assessment has also been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot, bicycle and public transport as well.
- The main service impact foreseen is in relation to school capacity. A contribution will be required from the developer which will be sought through a Section 106 agreement. There is scope in the locality to create a new school. Access to doctors surgeries is an ongoing national problem and further advice from NHS will be sought.
- A number of studies have been carried out on the site including a Phase 1 Habitat Survey, visual impact assessment, ground investigations. The findings and recommendations of these studies will be implemented as the site comes forward.
- Family housing is now proposed as opposed to executive housing, as well as a requirement to provide 15% affordable housing. The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city’s housing needs.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city’s housing needs.

HRS13 – New Herrington Working Men’s Club

- A Transport Assessment has been prepared for the site and the findings of this will have to be implemented as the site comes forward. This assessment also ensures that the access to

the site is safe and also takes into account how it will be accessed not only by private cars but for people on foot, bicycle and public transport as well.

- The Council has prepared a paper outlining the exceptional circumstances (SD.33²³⁷) as to why Green Belt land release is required to meet the city's housing needs.
- Many people were concerned regarding the loss of open space. However as the land is privately owned there would be no loss of amenity green space as it is not used by the public.
- A Phase 1 Habitat Survey has been prepared that will consider the impact on wildlife and it is considered that suitable mitigation can be put in place. There are numerous trees on the site which are protected by Tree Preservation Orders therefore the site will be carefully designed to preserve them unless individually they are considered to be dead, dangerous or dying at the time of development.

HRS14 – Land at Offerton

- The site has now been removed as a proposed allocation.

HRS15 – Land to the south of Philadelphia Complex

- One of the main concerns regarding the development of this site is the scale of development that has already taken place in the Coalfields and the impact that it has had on the local area and services. The main service impact foreseen is in relation to school capacity. A contribution will be required from the developer which will be sought through a Section 106 agreement. There is scope in the locality to create a new school. Access to doctor's surgeries is an ongoing national problem and further advice from NHS will be sought.
- A number of studies have been carried out including a Phase 1 Habitat Survey, Archaeology Study and Heritage Statement, Transport Assessment and Noise survey relating to this site and also the wider redevelopment of the Philadelphia Complex and it is anticipated that the issues raised can be mitigated against. In particular sensitive design is needed to minimise impact to neighbouring properties and to blend with the remainder of the Philadelphia Complex development, including the listed buildings.
- The Council has prepared a paper outlining the exceptional circumstances as to why Green Belt land release is required to meet the city's housing needs.
- With regards to the loss of green space the land is privately owned therefore there will be no impact on green space provision in the area and the impact to open countryside is considered to be limited, with little impact to Newbottle Village to the south or to the woodland and Magnesium Limestone Escarpment to the east.

Amendments to the Draft Plan

6.541 The main changes to the policy relate to the removal of 1 Housing Release Site, leaving 3 sites in Coalfield being supported as Housing Growth Areas. The 3 sites have been renamed and are as follows: HGA9 Penshaw; HGA10 New Herrington, and; HGA11 Philadelphia. Detailed development principles and parameters are now included for each site (SD.35²³⁸). The site that is no longer supported is HRS14 Land to the east of The Granaraies, Offerton.

Publication Draft Comments

6.542 The following main issues were identified by representations to Policy SS7:

²³⁷ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

²³⁸ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

- A significant number of residents object to the Housing Growth Areas, in particular the allocation of site HGA9. Specific objections that have been raised include:
 - The proposals are not consistent with the NPPF
 - All reasonable alternative sites have not been considered, including brownfield sites and empty homes
 - Impact on infrastructure including roads, schools, GPs etc
 - Flood risk
 - Environmental impact, including impact on wildlife, pollution
 - Lack of demand for housing – disagree with housing requirement which is overly ambitious
 - Impact of Brexit has not been considered in growth forecasts
 - Impact on Penshaw Monument
 - Lack of transparency over site selection methodology
 - Inadequate consultation
 - Development should focus on regeneration of city centre
 - Concern over ability of country park to host events
 - Loss of agricultural land
 - Impact on the identity of Penshaw.
- For site HGA11, a resident would like the policy to make clear that its delivery is dependent on completion of infrastructure from adjacent site (PD893).
- Sunderland Civic Society objects to impact of HGA9 on openness of location and suggests smaller boundary. Also consider that the housing requirement is over ambitious (PD4495).
- CPRE North East objects to the policy on the grounds that the OAN is not consistent with the standard methodology and will lead to weaker Green Belt boundaries (PD1171). Sunderland Green Party objects to Site HGA9 based on the volume of objections, impact on road network, loss of agricultural land and distance from local facilities. (PD717).
- National Trust concerned about the impact of site HGA9 on the setting of Penshaw Monument. Acknowledge that the policy seeks to address this, but feel that the impact of the whole development should be considered, not just its boundary design (PD4022).
- Highways England require additional modelling work to be undertaken (PD4846).
- For site HGA11 Historic England welcome the reference to the areas historic past, but would also like the policy to make reference to Newbottle Conservation Area (PD97).
- Barratt David Wilson Homes do not support the policy due to its interaction with other policies (PD5309). Persimmon Homes support site HGA11 but consider that part 3 of the policy would not be consistent with the NPPF (PD3948).
- Wynyard Homes concerned that the Council is over-reliant on brownfield sites with viability constraints. Would like site at Quarry House Lane to be allocated for development (PD4695). Paul Mackings Consulting Ltd object on the grounds that all non-Green Belt sites have been considered, including Hendon Paper Mill site (PD2953). Colin Ford (and owner) does not consider that exceptional circumstances have been justified for Green Belt release in the Coalfield sub area, when there are Settlement Breaks which could be developed (PD176).
- Esh Developments and Taylor Wimpey support the policy but suggest minor amendments to align to the NPPF. Esh suggest minor amendments Policy HGA10 relating to position of community building and need to protect trees. Taylor Wimpey suggest minor amendments to Site HGA10 (PD1875 & PD3536).

How Issues Have Been Taken into account prior to Submission

6.543 In response to the representation raised by Historic England (PD97) the Council has proposed an additional modification as set out in the Schedule of Modifications. The Council considers that no further modifications are required to make the policy sound.

- 6.544 A number of developers suggested alternative sites and boundaries have been suggested by landowners/developers. The Council has taken these into consideration. The Council has set out its justification for site selection and the spatial strategy in the compliance statement. The Council considers the spatial strategy for distribution of housing in Sunderland to be justified as it seeks to readdress the imbalance of housing land across the city. The Settlement Break Report (SD.48²³⁹) justifies the revised boundary for the Settlement Breaks and why it is not appropriate to remove alternative parcels of land.
- 6.545 The Council considers that there are exceptional circumstances which justify amendments to the Green Belt boundary. This is set out within the Exceptional Circumstances paper (SD. 33²⁴⁰). The housing requirement in the Plan is consistent with the OAN which is set out within the SHMA Addendum (2018) (SD.24²⁴¹). The Council is submitting the Plan under the transitional arrangements and therefore it would not be appropriate to use the standardised methodology.

Proposed Modifications to the Publication Draft

6.546 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
SS7: HGA11	Provide sensitive design that relates to the development of the Philadelphia Complex by providing a buffer to the west between the residential development and the proposed commercial development and incorporates design that relates to the area's historic past <u>including Newbottle Village Conservation Area, and Listed Building in the locality.</u>	To address representations submitted by Historic England (PD97). The Council have also signed a Statement of Common Ground (SD.8k ²⁴²).

Duty to Cooperate

6.547 Discussions have taken place with Durham County Council to discuss proposed Green Belt alterations, and no specific issues have been raised in relation to Housing Growth Areas.

Sustainability Appraisal (2017)

6.548 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA.

Sustainability Appraisal (2018)

6.549 This policy has not been subject to a detailed assessment for the reasons outlined detailed in Appendix F of the SA.

Justified

6.550 The policy sets out guidance for the management and growth of the HGA sites in the Coalfield Area including sites HGA9, HGA10 and HGA11 over the Plan period. The policy provides a clear indication as to what should be delivered as part of a planning application

²³⁹ https://www.sunderland.gov.uk/media/20966/SD-48-2018-Settlement-Break-Review/pdf/SD.48_2018_Settlement_Break_Review.pdf?m=636803838931900000

²⁴⁰ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000

²⁴¹ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

²⁴² https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

for the development of the sites. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

HGA9 Penshaw

Site location and description



Figure 23 Location of HGA9 - Penshaw

6.551 The site is situated on the south eastern edge of Penshaw and is currently used as grazing land. The site slopes from west to east down to Herrington Burn. To the north west the site is directly bordered by Chester Road (A183) with residential properties, a public house and restaurant beyond. To the north east and east lies Herrington Country Park and Herrington Burn, directly to the north is Penshaw Monument Grade I listed building which dominates the skyline. To the south is Chislehurst Road with modern residential development beyond

Justification for removing site from the Green Belt

6.552 The site was first put forward in the SHLAA in 2013. As part of the call out for sites for the SLR 2016 (SP.18²⁴³) (see SHLAA reference 465), the developer Taylor Wimpey submitted the site for consideration. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD.29-34²⁴⁴). The following summarised the outcomes of each stage of the assessment;

- **The Green Belt Review Stage 1 (SD.29²⁴⁵)** recommended that the HGA9 area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (see p79).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30²⁴⁶)** - considered whether the site had any impacts on Category 1 designations (full list of these on p24). The report found that the eastern edge of the land was affected by Flood Zone 3 (Category 1), but since the boundary to the site could easily be altered to avoid this land, the site was put forward to be considered at Stage 3 Site Selection (SD.31²⁴⁷) (p92-94). This Assessment also included a call-out-for-sites assessment-again; it was recommended that the full area be considered at Stage 3 (SD.31) (p158).
- **Stage 3 Green Belt Site Selection Report (SD.31)** concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p47-48).

²⁴³[https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18 Strategic Land Review Coalfield \(2016\).pdf?m=636803125302300000](https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18%20Strategic%20Land%20Review%20Coalfield%20(2016).pdf?m=636803125302300000)

²⁴⁴[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage \(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29%20Green%20Belt%20Review%20Stage%201%20Core%20Strategy%20Growth%20Options%20Stage%20(2016).pdf?m=636802951913330000)

[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

[https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32 Green Belt Assessment - 2018 Addendum.pdf?m=636802953199630000](https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32%20Green%20Belt%20Assessment%202018%20Addendum.pdf?m=636802953199630000)

²⁴⁵[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage \(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29%20Green%20Belt%20Review%20Stage%201%20Core%20Strategy%20Growth%20Options%20Stage%20(2016).pdf?m=636802951913330000)

²⁴⁶[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

²⁴⁷[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

²⁴⁷[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

²⁴⁷[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

²⁴⁷[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

- **2018 Green Belt Boundary Assessment and Recommendations (SD.34²⁴⁸)** concluded that HGA9 provides a square-shaped 'rounding-off' site that is well-related to the extensive existing housing to the immediate west and south of Penshaw. The existing boundaries to the north and east will need to be reinforced to create a more permanent, defensible new Green Belt boundary. In particular, the fencing/hedgerow along the site's northern boundary will require significant bolstering, and whilst the treeline adjacent to the fencing along the site's eastern edge is denser it will also require enhancement. Furthermore, it is considered that the fencing/treeline will constitute a more appropriate eastern boundary than the adjacent (Herrington Burn), which is not easily identifiable along the whole boundary (see pages 33-35).

6.553 Overall, the Green Belt Review has concluded that there are no major adverse impacts, and this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl, settlement merging and countryside encroachment. The Green Belt is wide at this point and the impact to the strategic gap also needs to be considered in light of the much narrower gap that exists immediately to the southeast at West Herrington. The site is also surrounded to the north and east by Herrington Country Park, and the site has an urban fringe feel.

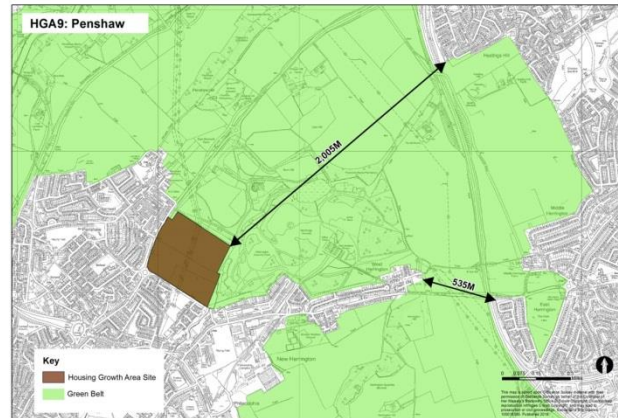


Figure 24 Green Belt Context for Site HGA9

Allocation of HGA9

6.554 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35²⁴⁹) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- A parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.555 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the Developer, Policy SS7 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.556 The following justifies the policy requirements;

Policy Requirement	Justification
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²⁴⁸ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

²⁴⁹ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 400 homes.
Mix of Family homes	The SHMA recognises the lack of suitable family homes in the city. The Plan promotes a mix of homes across the city, but it is expected that Greenfield sites, such as HGA9 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>The Council's 2018 Education Report (SD.62²⁵⁰) (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, a primary school is identified for a 105 place extension in the southern Coalfield area and a 210 place extension to an existing primary school in the Northern Coalfield area is required.</p> <p>Additional Secondary School places would also be required, and it is anticipated that this can be met through an extension/refurbishment to an existing school.</p> <p>Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan (SD.59²⁵¹) and has consulted with health partners in order to identify future needs.</p> <p>Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>
Local Facilities	Local facilities are provided at Shiney Row Local Centre, approximately 800m to the south west of the site and include local stores, food stores and medical centre. Three schools are also within close proximity of the site. Through the design of the development, it is expected that access to these and other facilities would be enhanced.
Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries.</p> <p>The existing boundaries to the north and east are moderately strong but will need to be reinforced to create a more permanent, defensible new Green Belt boundary. In particular, the fencing/hedgerow along the site's northern boundary will require bolstering, and whilst the treeline adjacent to the fencing along the site's eastern edge is denser it will also require enhancement. Furthermore, it is considered that the fencing/treeline will constitute a more appropriate eastern boundary than the adjacent (Herrington Burn), which is not easily identifiable along the whole boundary.</p>
Impact on GI, wildlife and landscape character	<p>Penshaw is well located in terms of access to the open countryside, natural & semi-natural greenspace and green infrastructure opportunities. The site lies within a Green Infrastructure corridor linking Herrington Country Park, Herrington Burn and Elba Park. A public right of way follows the southern boundary of the site. The sites benefits from being adjacent to Herrington Country Park, one of the largest parks in Sunderland with walk and cycle trails, an adventure play area, skate boarding and several lakes.</p> <p>The site lies approximately 1.5km to the south of Penshaw Hill and Woods offering further natural & semi-natural greenspace opportunities. Allotments lie directly opposite the site and to the south of the site at New Herrington Welfare Park/Herrington Recreation Ground there are a number of sports pitches including football pitches and bowling greens.</p> <p>The nearest watercourse to the site is the Herrington Burn running along the eastern boundary. A culvert runs north to south across the site. The culvert appears to have been partly removed/ damaged resulting in standing surface water.</p>
Respect of Penshaw	Penshaw Monument is located to the north of the site, the Grade I listed building is of very high significance; it represents an important example of the Greek revival in the

²⁵⁰ [https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

²⁵¹ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

Monument Grade 1 Listed Building	<p>region. It possesses considerable architectural and historic interest although much of its significance is derived from its visual prominence on Penshaw Hill, visible for many miles around. It has considerable aesthetic and communal value as a local and regional landmark</p> <p>The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement has been prepared. The recommendations of which will be brought forward as part of the development.</p>
Trees and Hedgerows (Pylons)	<p>Hedgerows are located on the northern and southern boundary along with two further hedgerows through the southern section of the site</p> <p>Electricity pylons run through the centre of the site and a further set are located in the south western corner</p>
Ecological improvements	<p>The site consists of grazed fields, hedgerows and a stream and functions as a useful buffer to adjacent Herrington Country Park. Nearby designated sites of nature conservation importance include Penshaw Hill and Wood Local Wildlife Site (LWS), Carr Hill LWS, Foxcover Plantation LWS and Herrington Hill Woodland LWS. Herrington Hill Site of Special Scientific Interest (SSSI) is also nearby. There are a number of protected and priority species associated with this site and surrounding area, such as breeding birds, bats, water vole and otter.</p> <p>Development must address direct and indirect impacts and include retention of all natural and semi-natural habitats with appropriate buffers to allow for connectivity. 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.</p>
Flood risk	<p>Small portion of eastern edge of the site is located within Flood Risk Zones 2 and 3, and is subject to surface water flooding. 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.</p>
Accessibility and Transport	<p>The A183 Chester Road is located to the west of the site and connects to the A19, Sunderland City Centre and Washington Highway. Chislehurst Road runs along the southern edge of the site and provides access to local residential estates. There are plans for a link road to be provided from Chislehurst Road through to New Herrington as part of the approved development of the Philiadelphia Complex.</p> <p>The site is well served by public transport with bus stops located on Chester Road adjacent the site providing regular connections to Washington and Sunderland.</p> <p>The site is not subject to any Public Rights of Way or cycle routes however formal pedestrian routes are provided for within Herrington Country park to the north of the site.</p> <p>The Transport Assessment and the Council has identified that a number of junctions in the vicinity of the site should be assessed as part of a site Transport Assessment. This includes Wensleydale Avenue, A183/Washington Highway and A183/A19.</p>
Access	<p>The Council would require vehicular access to the site to be via Chislehurst Road and not from Chester Road.</p>

HGA10 New Herrington
Site location and description



Figure 25 Location of HGA10 - New Herrington

6.557 The site is located within the centre of New Herrington and currently consists of New Herrington Working Men’s Club, private grounds and a bowling green. The site is level in nature and includes many trees protected under TPOs. To the north the site directly borders Kitchener Terrace with residential properties and a local store, to the east properties on Herrington Mews directly back onto the bowling green presenting timber boarded fencing. To the south lies New Herrington Recreation Park and the east is Langley Street and a residential terrace.

Justification for removing site from the Green Belt

6.558 The Workingmens Club and car park (not in Green Belt) was first submitted to the Council in the SHLAA in 2008, identifying 0.42 hectares with an estimated yield of 14 houses. As part of the call out for sites for the SLR 2016 (SP.18²⁵²) (see SHLAA reference 465), Esh Developments submitted the site for consideration. Esh propose that the 1.6 hectare site could also provide 30 homes. As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review (SD29-34²⁵³). The following summarised the outcomes of each stage of the assessment;

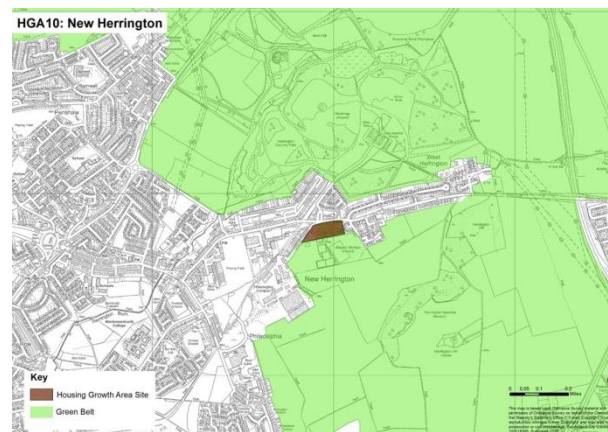


Figure 26 Green Belt Context for Site HGA10

- **2016 Green Belt Review Stage 1 (SD.29)** recommended that the HGA10 area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (SD.30) (see p93).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30)** found that the land did not impact on Category 1 designations, and so the site was put forward to

²⁵²[https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-pdf/SP.18 Strategic Land Review Coalfield \(2016\).pdf?m=636803125302300000](https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-pdf/SP.18 Strategic Land Review Coalfield (2016).pdf?m=636803125302300000)

²⁵³[https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage \(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-pdf/SD.29 Green Belt Review Stage 1 Core Strategy Growth Options Stage (2016).pdf?m=636802951913330000)
[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 (2017).pdf?m=636802952402030000)
[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-pdf/SD.31 Stage 3 Green Belt Site Selection Report (2017).pdf?m=636802952791430000)
<https://www.sunderland.gov.uk/media/20875/SD-32-Green-Belt-Assessment-2018-Addendum/pdf/SD.32 Green Belt Assessment - 2018 Addendum.pdf?m=636802953199630000>
<https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33 Review of the Sunderland Green Belt Part 1- Exceptional Circumstances for Releasing Land from .pdf?m=636802953653470000>
[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations (2018).pdf?m=636802954099430000)

be considered at Stage 3 Site Selection (SD.31) (p103-105). This Assessment also included a call-out-for-sites assessment- again, it was recommended that the full area be considered at Stage 3 (SD.31) (p116).

- **Stage 3 Green Belt Site Selection Report (SD.31)** concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p49-50).
- **2018 Green Belt Boundary Assessment (SD.34)** concludes that HGA10 provides a logical housing site, the release of which will not materially harm the purposes of the extensive area of Green Belt to the south. The existing, mature treeline along the site's southern boundary represents a logical, robust and defensible boundary (see pages 36-38).

6.559 Overall, there are no major adverse impacts. This land parcel has minor or zero impact against Green Belt purpose.

Allocation of HGA9

6.560 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35²⁵⁴) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- A parameters plan, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.561 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the Developer, Policy SS7 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.562 The following justifies the policy requirements:

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 20 dwellings.
Mix of Family homes	The SHMA 2017 (SD.23 ²⁵⁵) recognises the lack of suitable family homes in the city. The Plan promotes a mix of homes across the city, but it is expected that Greenfield sites, such as HGA 10 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	The Council's 2018 Education Report (SD.62 ²⁵⁶) (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, a primary school is identified for a 105 place extension in the southern Coalfield area and a 210 place extension to an existing primary school in the Northern Coalfield area is

²⁵⁴[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

²⁵⁵[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

²⁵⁶[https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_\(2018\).pdf?m=636803113299670000](https://www.sunderland.gov.uk/media/20903/SD-62-Local-Plan-Education-Planning-Report-2018-/pdf/SD.62_Local_Plan_Education_Planning_Report_(2018).pdf?m=636803113299670000)

	<p>required.</p> <p>Additional Secondary School places would also be required, and it is anticipated that this can be met through an extension/refurbishment to an existing school.</p> <p>Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan (SD.59²⁵⁷) and has consulted with health partners in order to identify future needs.</p> <p>Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>
Local Facilities	<p>Shiney Row local centre is located one mile to the west of the site and provides a wide range of facilities including, local stores, food retailers, post office and medical facilities. There are also two local stores within close proximity of the site, one is adjacent and the other is located within 450m. The closest primary school to the site is also located within Shiney Row.</p> <p>Sustainable site, lying within New Herrington village and connected to a main bus route.</p>
Incorporate a new club building and car parking	<p>Not only does the current Workingman's club provide a community hub for people to meet and socialise it also operates as a community facility, offering function room facilities for community use. As such development of this site will need to ensure that this community facility is not lost and incorporate a new club and associated car parking facilities within the site area. This will also provide an opportunity to enhance access to local facilities and services as required through the policy and changing facilities will be incorporated into the community building to support sport uses in the park.</p>
Greenspace improvements to the adjacent park	<p>Herrington is well located in terms of access to the open countryside, natural & semi-natural greenspace and green infrastructure opportunities. The site incorporates Herrington Welfare Park, and a small allotment site and lies adjacent to Herrington Recreation Ground where there are a number of sports pitches including football pitches and bowling greens and children's play facilities.</p> <p>The area forms the edge of the strategic Green Infrastructure corridor linking the River Wear southwards into County Durham. The site benefits from being in close proximity to Herrington Country Park, one of the largest parks in Sunderland with walk and cycle trails, an adventure play area, skate boarding and several lakes.</p> <p>As the land is privately owned there would be no loss of amenity green space as it is not used by the public. Indeed, the revised site layout will improve access into the neighbouring park, and the proposed community building is planned to provide new changing facilities for sports use in the park.</p>
Impact on GI, wildlife and landscape character	<p>Herrington is well located in terms of access to the open countryside, natural & semi-natural greenspace and green infrastructure opportunities. The site incorporates Herrington Welfare Park, and a small allotment site and lies adjacent to Herrington Recreation Ground where there are a number of sports pitches including football pitches and bowling greens and children's play facilities.</p> <p>The area forms the edge of the strategic Green Infrastructure corridor linking</p>

²⁵⁷ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

	the River Wear southwards into County Durham. The sites benefits from being in close proximity to Herrington Country Park, one of the largest parks in Sunderland with walk and cycle trails, an adventure play area, skate boarding and several lakes.
Trees	A number of the trees within the grounds of the park have TPO (Tree Preservation Order) status. TPO's control the felling and pruning of trees which make a significant contribution to the environment. Therefore, the site will be carefully designed to preserve them unless individually they are considered to be dead, dangerous or dying at the time of development. Sensitive design will be required to mitigate for impacts to protected/priority species
Ecological improvements	The site consists of mown landscape garden with large number of protected mature trees and hedge rows. There are several designated sites of nature conservation importance nearby including Philadelphia Pond LWS located approx. 200m to the west, Herrington Hill Woods LWS approx. 500m to the south and Herrington Hill SSSI to approx. 600m to the east. There are a number of protected and priority species associated with the surrounding area. There are no direct impacts to protected wildlife sites on site, and Esh Developments has provided an Ecology statement identifying that the impact on protected and priority species is low.
Flood risk	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.
Accessibility and Transport	The site is accessed from Kitchener Terrace (B1286) which is located directly to the north of the site. New Herrington provides excellent connections to the regional road network through its close proximity (one mile to the east) to both the A690 and A19, The site is served by good public transport connections with bus stops located directly adjacent on Kitchener Terrace; providing regular connections to Sunderland City Centre, Doxford Park, Newcastle and Chester-Le-Street. There are no formal Public Rights of Way or sites through the site however there are several desire lines identified on aerial imagery. As part of a site Transport Assessment Various vehicular junctions in the vicinity of the site should be assessed. This includes B1286/A182 and B1286/A690.
Access	The current vehicle access onto the B1286 should be retained.

HGA11 Philadelphia



Figure 27 Location of HGA11 - Philadelphia

Site location and description

6.563 The 8.32ha site is located to the east of Philadelphia and is adjacent to the former Philadelphia Complex which has permission for mixed use development including up to 500 units. The site is predominantly agricultural land with a small element of brownfield land and is proposed as an extension to the approved

development. The future development of the Philadelphia complex will change the character of the surrounding built environment and should be used to inform the development of this site

Justification for removing site from the Green Belt

6.564 In 2012-13, planning approval was being sought for the full site (incorporating the Philadelphia Complex as well as the extension into Green Belt). This was subsequently called in by the Secretary of State and later withdrawn by the applicant in December 2013. A revised planning application for the Philadelphia Complex was re-submitted (excluding Green Belt) and has now been granted approval for 500 homes)²⁵⁸.

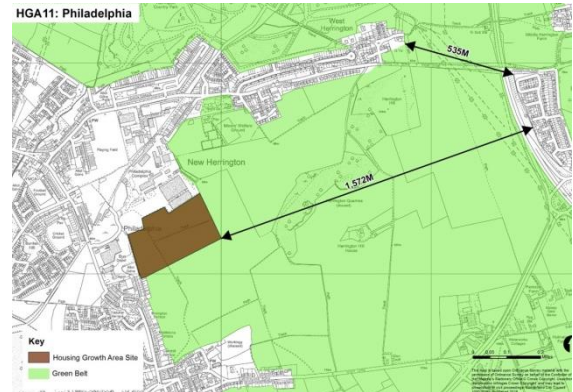


Figure 28 Green Belt context Site HGA12

6.565 As part of the call-for-sites for the Strategic Land Review 2016 (SP.18²⁵⁹), Esh

Developments resubmitted the proposal for the extension into the Green Belt (SHLAA site 330B, or Philadelphia Complex Phase 6). As the site is part of the Green Belt, the site was considered at every stage of the Green Belt Review. The following summarised the outcomes of each stage of the assessment;

- **2016 Green Belt Review Stage 1 (SD.29²⁶⁰)** recommended that the HGA11 area did not have a fundamental adverse impact on the Green Belt, so would therefore be considered at Stage 2 (SD.30) (see p93).
- **Green Belt Assessment Stage 1 Updated and Stage 2 (2017) (SD.30²⁶¹)** report found that the land did not impact on Category 1 designations, and so the site was put forward to be considered at Stage 3 Site Selection (p103-105). This Assessment also included a call-out-for-sites assessment (site 330B, p128)- again, it was recommended that the full area be considered at Stage 3 (SD31) (p128).
- **Stage 3 Green Belt Site Selection Report (SD.31²⁶²)** concluded that the site was sustainable, available, achievable and deliverable and considered suitable as an HGA site (p53-54)
- **2018 Green Belt Boundary Assessment and Recommendations (SD.34²⁶³)** concludes that HGA11 provides a logical housing site to support the development of Philadelphia Industrial Estate. The assessment recommended that the site's eastern and southern boundaries should be amended to create a more rectangular (and therefore logical and developable) site. A new, permanent, defensible boundary will need to be created along the eastern and southern boundaries given that the site presently comprises open agricultural fields (see pages 36-38).

²⁵⁸ Planning application reference: 14/00538/HYB

²⁵⁹ [https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_\(2016\).pdf?m=636803125302300000](https://www.sunderland.gov.uk/media/20920/SP-18-Strategic-Land-Review-Coalfield-2016-/pdf/SP.18_Strategic_Land_Review_Coalfield_(2016).pdf?m=636803125302300000)

²⁶⁰ [https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_\(2016\).pdf?m=636802951913330000](https://www.sunderland.gov.uk/media/20872/SD-29-Green-Belt-Review-Stage-1-Core-Strategy-Growth-Options-Stage-2016-/pdf/SD.29_Green_Belt_Review_Stage_1_Core_Strategy_Growth_Options_Stage_(2016).pdf?m=636802951913330000)

²⁶¹ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

²⁶² [https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

²⁶³ [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

6.566 Overall, there are no major adverse impacts, and this land parcel performs moderately against Green Belt purpose, notably in terms of urban sprawl, settlement merging and countryside encroachment. The Green Belt is wide at this point and the impact to the strategic gap also needs to be considered in light of the much narrower gap that exists immediately to the northeast at West Herrington.

Allocation of HGA9

6.567 To ensure the site is suitable for housing development and deliverable as an allocated site, the Council has prepared a number of studies which has assessed the development potential of each site. Taking into consideration the sites constraints and cumulative impacts of the development. The Council prepared Development Frameworks (SD.35²⁶⁴) which includes;

- A contextual analysis of the site and the surrounding area,
- The site constraints and opportunities
- A parameter plans, which identifies how the constraints could be addressed and confirms the capacity of each site.

6.568 Based on this evidence, and a number of technical studies which were submitted to the Council on behalf of the developer, Policy SS7 established a framework for the future development of HGA. The policy is not overly prescriptive to ensure that there is a degree of flexibility to allow a viable, deliverable scheme to come forward.

6.569 The following justifies the policy requirements;

Policy Requirement	Justification
Capacity of the site	Given the constraints on the site, the capacity is estimated to be approximately 195
Mix of Family homes	The SHMA 2017 (SD.23 ²⁶⁵) recognises the lack of suitable family homes in the city. The Plan promotes a mix of homes across the city, but it is expected that Greenfield sites, such as HGA9 could accommodate a lower density of development and achieve a higher proportion of family homes.
Education and Healthcare	<p>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, a primary school is identified for a 105 place extension in the southern Coalfield area and a 210 place extension to an existing primary school in the Northern Coalfield area is required.</p> <p>Additional Secondary School places would also be required, and it is anticipated that this can be met through an extension/refurbishment to an existing school.</p> <p>Development of this site would be expected to contribute towards the provision of Health Care. The Council has prepared an Infrastructure Delivery Plan (SD.59²⁶⁶) and has consulted with health partners in order to identify future needs.</p> <p>Policies ID1 and ID2 will enable contributions to be secured towards health infrastructure where required.</p>

²⁶⁴[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

²⁶⁵[https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

²⁶⁶[https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

Local Facilities	<p>Shiney Row local centre is located in close proximity to the site and provides a wide range of facilities including, local stores, food retailers, post office and medical facilities. The closest primary school to the site is also located within Shiney Row. The development site itself proposes a small supermarket, offering further choice for residents when implemented.</p> <p>Sustainable site that is positioned on a main bus route.</p>
Defensible Green Belt Boundary	<p>In accordance with the NPPF, the development would have to ensure the creation of defensible Green Belt boundaries. The Green Belt Boundary Review (SD.34²⁶⁷) concluded that the site's eastern and southern boundaries should be amended to create a more rectangular (and therefore logical and developable) site. A new, permanent, defensible boundary will need to be created along the eastern and southern boundaries given that the site presently comprises open agricultural fields.</p>
Greenspace improvements to the adjacent park	<p>Philadelphia is well located in terms of access to the open countryside, natural & semi-natural greenspace and green infrastructure opportunities. The site lies in close proximity to Herrington Welfare Park, and a small allotment site and lies adjacent to Herrington Recreation Ground where there are a number of sports pitches including football pitches and bowling greens and children's play facilities.</p> <p>The proposals for the site include 8 hectares of greenspace and the site forms part of a Green Infrastructure Corridor (with Public Right of Way) linking Elba Park and Herrington Country Park. Herrington Country Park is one of the largest parks in Sunderland with walk and cycle trails, an adventure play area, skate boarding and several lakes; whilst Elba Park is an attractive new Country Park in Sunderland which has quickly establishing itself as a haven for wildlife and a popular place for people to enjoy the natural environment.</p> <p>With regards to the loss of green space the land is privately owned therefore there will be no impact on green space provision in the area and the impact to open countryside is considered to be limited, with little impact to Newbottle Village to the south or to the woodland and Magnesium Limestone Escarpment to the east.</p>
Impact on GI, wildlife and landscape character	<p>There is no direct evidence of prehistoric or medieval activity on the site, however there is a suggested presence within the wider area. The wider Philadelphia site has a long industrial history and has been the site of Newbottle Colliery, Durham Collieries Power Station and the Sunderland and District Tramways Depot. The most prominent surviving archaeological features on the site will be those associated with these previous uses.</p> <p>The Philadelphia complex contains two areas of listed buildings, one to the north and one to the west, these buildings will be restored through the development of the wider complex.</p> <p>Newbottle conservation area is located 800m to the south.</p> <p>Policy SS7 requires high architectural quality to protect long distance views to the southern edge of the development from the south. This will help to minimise any impact on the setting of Newbottle Conservation Area. Greenspace buffers to the south and east of the site will also be provided in order to support the adjacent wildlife and green infrastructure corridor and limit any impact on the areas landscape character.</p> <p>Historic England suggested policy amendment to include reference to the Newbottle Village Conservation Area and its setting. The Council and Historic England have</p>

²⁶⁷

[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

	agreed a Statement of Common Ground and this includes revised policy wording in relation to the comment made).
Heritage	<p>Archaeology Studies have been carried out as part of the Philadelphia Complex redevelopment. Within this, listed properties are to be retained and enhanced.</p> <p>The County Archaeologist requested that archaeological work was carried out on the site and an Archaeology Study and Heritage Statement has been prepared. The recommendations of which will be brought forward as part of the development.</p>
Ecological improvements	<p>The site sits within an important Wildlife Corridor, and forms part of the arable landscape traditional in this area. Nearby designated sites include Herrington Hill Site of Special Scientific Interest (SSSI), Herrington Hill Woodland Local Wildlife Site (LWS), The Clouds LWS, Houghton Hill Cut and Scarp LWS, Foxcover Plantation and Carr Hill LWS. The site comprises of arable land, hedgerows, scattered and dense scrub and neutral grassland. All habitats on site have the potential to support priority species in particular farmland birds and bats but is not limited to these species.</p> <p>There are no direct impacts to protected wildlife sites on site, and Esh Developments has provided an Ecology statement identifying that the impact on protected and priority species is low. However, there is a proposed Local Wildlife Site located on the north eastern edge of the site and Policy SS7 states that the site will be protected and any impact minimised- Esh Developments propose a green corridor as part of their development design.</p> <p>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.</p>
Flood risk	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.
Accessibility and Transport	<p>It is not currently possible to access the site through the existing highway network. The closest road to the site is the A182 located to the west. The site will require access through the highway network developed as part of the Philadelphia Complex to the north which includes the provision of a new link road between Philadelphia/ New Herrington and Penshaw/ Chester Road (A183) to address wider capacity issues.</p> <p>The area is well served by public transport with two bus stops within 400m of the site providing regular bus services to Sunderland City Centre, Houghton-le-Spring, Newcastle and Chester-le-Street.</p> <p>No formal rights of way, public footpaths or cycle routes are located within the site however a right of way does run along the western boundary of the site.</p>
Access	Vehicular and pedestrian access to the site should be from Philadelphia Complex, additional pedestrian links could be provided along the southern boundary As part of the site Transport Assessment various vehicular junctions in the vicinity of the site should be assessed. This includes Coaley Lane/Houghton Road, A182/Front Street and A182/B1286

Reasonable Alternatives

6.570 Throughout the preparation of the Plan, alternative sites have been submitted to the Council as options. The following summarises why the Council do not consider any of these sites to be an alternative allocation.

Site	Justification for discounting approach
Land to the east of The Granaries, Offerton Developer/Landowner: Mr Delaney	<p>This site was identified in the Draft Plan as a potential allocation. However, this was when assessment work considered the sites to be brownfield and therefore in accordance with the NPPF it was considered to be a sustainable site. It has come to the Council attention, that the site constitutes greenfield land and therefore 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. As stated in (SD34²⁶⁸) page 32 amending the Green Belt boundary at Sub-Area 8 was considered, but the review concluded that the majority of the land is fundamental to the purposes of the Sunderland Green Belt and there is no justification for making strategic amendments to this part of the boundary.</p>
Land off Herrington Road, West Herrington Developer/Landowner: Mr H McCall	<p>Land at Herrington Road, West Herrington has been submitted as an alternative site for 10 homes. 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 Green Belt Boundary Assessment (SD.34²⁶⁹) considered changes to the Green Belt boundary, but concluded that the land in question should remain in the Green Belt, with the boundary following Herrington Road and the rear boundaries of housing on St Aidan's Terrace (p36-38). This area was also considered in the Stage 3 Green Belt Site Selection Report (SD31²⁷⁰) (field parcel HO4). The site was considered to have moderate Green Belt purpose and not suitable for development because of its location being directly adjacent to a SSSI (p97). For the above reasons, the Council therefore does not support removal of the site from the Green Belt.</p>
Land east of Newbottle Developer/Landowner: O&H Properties	<p>The site has been comprehensively assessed through the Green Belt Review. The Green Belt Assessment Stage 1 Updated and Stage 2 (SD.30²⁷¹) report considers the large site affects 4 field parcels (parcels HO19, HO22, HO23 and HO26- see pages 102-104). The review concluded that field parcels HO22 and HO26 would not have major overall adverse impacts to Green Belt purpose, whereas field parcels HO19 and HO23 were discounted at this stage and were seen as fundamental to Green Belt purpose.</p> <p>As part of the call-for sites section of this report (SD.30) see page 129) the site was then considered as a single unit. In this instance, the site was discounted principally because of its impact to purpose 'D' that the fields are fundamental to the setting of the historic village (and Conservation Area) of Newbottle. It should be noted that the impact on urban sprawl and countryside encroachment are also considered to be 'moderate adverse'.</p>

²⁶⁸[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

²⁶⁹[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34 Review of the Sunderland Green Belt Part 2 Boundary Assessment and Recommendations \(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34%20Review%20of%20the%20Sunderland%20Green%20Belt%20Part%20Boundary%20Assessment%20and%20Recommendations%20(2018).pdf?m=636802954099430000)

²⁷⁰[https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31 Stage 3 Green Belt Site Selection Report \(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31%20Stage%203%20Green%20Belt%20Site%20Selection%20Report%20(2017).pdf?m=636802952791430000)

²⁷¹[https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30 Green Belt Assessment Stage 1 Updated and Stage 2 \(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30%20Green%20Belt%20Assessment%20Stage%201%20Updated%20and%20Stage%202%20(2017).pdf?m=636802952402030000)

	<p>Furthermore, the Green Belt Boundary Assessment (SD.34) (p37-38) reviewed the Green Belt boundary to the south of Newbottle and east of Graswell and concluded that no boundary change was justified. More specifically, the housing boundary at Newbottle and road line of the A182 provide a strong, defensible and well-defined boundary.</p> <p>The site forms part of the Magnesian Limestone Escarpment and is identified 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.</p>
<p>Land to the east of Seaham Road, Houghton Developer/Landowner: Taylor Wimpey</p>	<p>The land in question lies to the east of Houghton-le-Spring and is proposed for 270 houses. The Green Belt Assessment Stage 1 Updated and Stage 2 report confirms (SD.30) (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 (SD.34²⁷²) (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 (SP.47²⁷³) 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 (SD.31²⁷⁴) (p83) which confirms that the site is not suitable due to the reasons outlined above.</p>
<p>Land at Copt Hill Public House, Houghton-le- Ref: Developer/Landowner: Ei Group</p>	<p>The Green Belt Assessment Stage 1 Updated and Stage 2 report (SD.30²⁷⁵) 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 (SD.34) (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 (SD.47) 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>

²⁷² [https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

²⁷³ [https://www.sunderland.gov.uk/media/20947/SP-47-Sunderland-Landscape-Character-Assessment-2015-/pdf/SP.47_Sunderland_Landscape_Character_Assessment_\(2015\).pdf?m=636803141463200000](https://www.sunderland.gov.uk/media/20947/SP-47-Sunderland-Landscape-Character-Assessment-2015-/pdf/SP.47_Sunderland_Landscape_Character_Assessment_(2015).pdf?m=636803141463200000)

²⁷⁴ [https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_\(2017\).pdf?m=636802952791430000](https://www.sunderland.gov.uk/media/20874/SD-31-Stage-3-Green-Belt-Site-Selection-Report-2017-/pdf/SD.31_Stage_3_Green_Belt_Site_Selection_Report_(2017).pdf?m=636802952791430000)

²⁷⁵ [https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_\(2017\).pdf?m=636802952402030000](https://www.sunderland.gov.uk/media/20873/SD-30-Green-Belt-Assessment-Stage-1-Updated-and-Stage-2-2017-/pdf/SD.30_Green_Belt_Assessment_Stage_1_Updated_and_Stage_2_(2017).pdf?m=636802952402030000)

- 6.571 The Council has also considered alternative boundary and policy requirements to site HGA9. Representations submitted to the Council suggested that;
- boundary alteration to the south east is required,
 - a smaller buffer may be appropriate to the Herrington Burn;
 - point vi) of the policy be more flexible in relation to greenspace and remove reference to pylon buffer zone (preferred option is to ground the pylons);
 - sub point vii) is removed and; point x) is made less prescriptive and refers instead to a submitted Transport Assessment as part of any planning application.
- 6.572 In response, 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. It is noted that the policy also states that HGA9 Peshaw "should" address the 10 criteria, so there is therefore some flexibility. The Council do not consider it necessary to amend the boundary at Herrington Burn.

Effective

Deliverable

- 6.573 The developers in their representations to the Council have supported the allocations of these sites for residential development and consider that the sites are deliverable. In regards to the infrastructure requirements to deliver the site, it is expected that developer contributions will be sought in accordance with Policy ID1, ID2 and the emerging Planning Obligations SPD (SD.63²⁷⁶). The Council Viability Assessment (SD.60²⁷⁷) has concluded that sites of a similar typology are viable.
- 6.574 The policy will be delivered through the submission of planning applications by housing developers and the City Council and their determination by the Local Planning Authority.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SS7	The Coalfield Housing Growth Areas	Identifies the Housing Growth Areas in the Coalfield and what is expected to be provided/achieved by them	<ul style="list-style-type: none"> • Failure to provide a mix of housing types • Failure to secure contributions for education and healthcare provision 	<ul style="list-style-type: none"> • Identify reasons for lack of development • Potential review of the Plan/Policy • Negotiation with developers to ensure delivery of appropriate housing mix. • Potential review of the Plan • Review of s106 contribution collection process/Planning 	<ul style="list-style-type: none"> • Housing completions within each HGA • Developer contributions collected in each HGA • Housing mix in each HGA 	<ul style="list-style-type: none"> • SCC Monitoring data • Planning applications • SHLAA

²⁷⁶[https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-/pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_\(2018\).pdf?m=636803113837800000](https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-/pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_(2018).pdf?m=636803113837800000)

²⁷⁷[https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017_.pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017_.pdf?m=636803111173630000)

Consistent with National Policy

6.575 By allocating these sites for housing the plan is managing the patterns of growth within the city to make the fullest possible use of public transport and focus significant development in locations that can be made sustainable (Para 17 of the NPPF). The policy is also ensuring that the required infrastructure is provided for the site.

7. Healthy and Safe Communities

SP7 Healthy and Safe Communities

- 7.1 Many factors influence our health, including the lifestyles we lead, the environment we live in, the opportunities we have to exercise and our access health and other facilities. A wider sense of wellbeing is influenced by a variety of factors such as opportunities for work and recreation, attractive environments, personal relationships and feelings of safety and being part of a community.
- 7.2 The link between planning and health outcomes is long established and most recently reinforced by the NPPF, PPG and the Government's public health strategy 'healthy lives, healthy people'. Health is a cross cutting theme of the Plan but Policy SP7 seeks to establish a strategic policy framework to improve health and wellbeing in Sunderland.

SP7 Healthy and Safe Communities

The council will seek to improve health and wellbeing in Sunderland by:

1. working with the NHS to improve health outcomes, particularly in areas with the poorest health and reduce health inequalities generally;
2. protecting existing health facilities and/or supporting the provision of new or improved facilities (Policy VC5);
3. promoting and facilitating active and healthy lifestyles;
4. supporting the integration of health facilities and services with other community uses (education, sport, cultural and leisure) through multi-purpose buildings;
5. managing the location/number of and access to unhealthy eating outlets (Policy VC4);
6. ensuring that new developments:-
 - i. are age friendly, inclusive, safe, attractive and easily accessible on foot or by bicycle;
 - ii. have a strong sense of place which encourages social interaction;
 - iii. are designed to promote active travel and other physical activities through the arrangement of buildings, location of uses and access to open space;
 - iv. promote improvements and enhance accessibility to the city's natural, built and historic environments;
 - v. do not have unacceptable adverse impacts upon amenity which cannot be adequately mitigated (Policies HS1 and HS2);
 - vi. appropriately address any contaminated land to an acceptable level (Policy HS3); and
 - vii. submit a Health Impact Assessment (HIA) as part of any application for major development. Where significant adverse health impacts are identified, development should be resisted unless appropriate mitigation can be provided.

Positively Prepared

Vision and Strategic Priorities

- 7.3 This policy will deliver the spatial vision and strategic priorities by helping to create a city that is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations; is more socially, economically and environmentally sustainable; has improved social; infrastructure, with additional healthcare, education and community facilities; and has easy access to useable open space, leisure and recreation.
- 7.4 Policy SP1 will help to deliver Strategic Priorities 1, and 3

Draft Plan Comments

- 7.5 As set out in the Consultation Statement (SD07)²⁷⁸, the following issues were raised during the draft Plan consultation:

²⁷⁸ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Resident requests the plan be aligned to changes to the NPPF.
- Sunderland Clinical Commissioning Group (CCG) requested reference to larger facilities.
- Education and skills Agency requests the plan consider the education requirements and funding opportunities.
- Developers including Persimmon, Taylor Wimpey, Hellens, New Herrington Working man's Club and Esh Developments consider the requirement for HIA to be unjustified and onerous.
- Kentucky Fried Chicken opposes the policy requirement to limit hot food takeaways, as hot food takeaways can also sell healthy food. KFC suggest that hot food takeaways policy should be based on protection of vitality and viability.
- Sports England broadly supports the policy.
- Siglion request a flexible approach to open space.
- Residents questioned if hot food takeaways would have the biggest impact on health.
- Historic England supports the policy.

How Issues Have Been Taken into Account at Publication Draft

7.6 When preparing the Publication Draft the Council took into consideration the key issues identified:

- In response to the CCG, the Plan makes reference to larger health facilities.
- The Education Plan (SD.62²⁷⁹) and IDP (SD.59²⁸⁰) has been updated to include more detail on where provision for schools would be needed.
- In response to developers concerns, the Plan includes the need to undertake an HIA on sites of 100 dwellings or more or if the development requires an EIA. To reduce the burden to developers, the Council has updated the supporting text to ensure that the HIA is proportionate to the scale of the development and can be included in other assessments such as a Design and Access Statement.
- In response to KFC's response, the Council acknowledge that hot food takeaways are just one of the contributory factors to obesity levels within the city and the plan contains a range of policies which seek to promote healthy communities. Public Health evidence prepared in support of the Plan shows that Sunderland is already well served by hot food takeaways. Following the recommendations of the Health Impact Assessment, Policy VC4 has been amended to set out the Council's approach to limiting hot food takeaways on health grounds.
- Health and wellbeing is a common thread across all aspects of the plan. The Council undertook a Health Impact Assessment (HIA)(SD.19²⁸¹) as part of the draft Plan. Amendments have been made to reflect the recommendations of the HIA, where possible.

Publication Draft Comments

7.7 As set out in the Consultation Statement (SD07), the following issues were raised during the Publication Draft consultation:

- Historic England supported the recognition that the historic environment plays a role in improving health and wellbeing, as noted in part 6(iv) (PD98).
- The Coal Authority support the inclusion of policy SP7 but request that unstable land is added into criteria 6vi (PD1257).

²⁷⁹[https://www.sunderland.gov.uk/media/20978/SP-62-Schedule-of-Representations-to-Draft-Core-Strategy-and-Development-Plan-January-2018-/pdf/SP.62_Schedule_of_Representations_to_Draft_Core_Strategy_and_Development_Plan_\(January_2018\).pdf?m=636806595279570000](https://www.sunderland.gov.uk/media/20978/SP-62-Schedule-of-Representations-to-Draft-Core-Strategy-and-Development-Plan-January-2018-/pdf/SP.62_Schedule_of_Representations_to_Draft_Core_Strategy_and_Development_Plan_(January_2018).pdf?m=636806595279570000)

²⁸⁰[https://www.sunderland.gov.uk/media/20958/SP-59-Sunninside-Planning-and-Design-Framework-2008-/pdf/SP.59_Sunninside_Planning_and_Design_Framework_\(2008\).pdf?m=636803148790430000](https://www.sunderland.gov.uk/media/20958/SP-59-Sunninside-Planning-and-Design-Framework-2008-/pdf/SP.59_Sunninside_Planning_and_Design_Framework_(2008).pdf?m=636803148790430000)

²⁸¹[https://www.sunderland.gov.uk/media/20921/SP-19-Strategic-Land-Review-North-2016-/pdf/SP.19_Strategic_Land_Review_-_North_\(2016\).pdf?m=636803125698470000](https://www.sunderland.gov.uk/media/20921/SP-19-Strategic-Land-Review-North-2016-/pdf/SP.19_Strategic_Land_Review_-_North_(2016).pdf?m=636803125698470000)

- NHS Sunderland CCG support the policy in general terms but consider the threshold for Health Impact Assessment should be lowered for housing schemes and extended to cover student accommodation. The CCG suggested that thresholds should be included within the policy criterion 6 viii) (PD69).
- Bellway Homes 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 (PD1925). Burdon Lane Consortium objects to the 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 (PD2301).
- Persimmon Homes objects 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 (PD3968). Story Homes objects to Policy SP7 (6vii) and paragraph 5.5 – requiring all developments of 100 dwellings or more to submit a HIA is overly onerous and is not consistent with national policy. Story’s propose that these sections should be deleted (PD5284).
- Kentucky Fried Chicken Limited objects to criterion 5 of policy SP7 on the grounds that it uses negative assumptions and cross referencing to Policy VC4 implies that unhealthy eating outlets equates directly to hot food takeaways, irrespective of the choice of food they serve (PD260).
- A resident objected to the policy on the grounds that the proposed Renewable Energy Centre in Washington conflicts with the policy.

How issues have been taken into account prior to Submission

7.8 In response to the representations raised by NHS Sunderland CCG (PD69), the Council has proposed minor modifications as set out in the Schedule of Modifications (M31). The Council has taken into consideration the representations and are not proposing to make any further modifications to this policy. With regard to the comments from Kentucky Fried Chicken Limited, it was not considered to be necessary to amend the policy as it just seeks to indicate that Policy VC4 will help to deliver the aspiration in the policy.

Proposed Modifications to the Publication Draft

7.9 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
5.5	Residential schemes for 100 dwellings or more, <u>student accommodation schemes for 100 bed spaces or more</u> , or any other form of development for which an Environmental Impact Assessment would be required.	To address representations submitted by NHS Sunderland Clinical Commissioning Group (PD69).

Duty to Cooperate

7.10 Health and Wellbeing is a strategic issue with cross boundary implications. The Council continue to work closely with neighbouring authorities on health and wellbeing issues, particularly with South Tyneside following the formation of the South Tyneside and Sunderland Healthcare Group who are committed to collaborating to transform health services across both communities. Notwithstanding this, no specific duty to cooperate issues have been identified relating to health and wellbeing.

Sustainability Appraisal (2017)²⁸²

7.11 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

7.12 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA6: Health and Wellbeing	In the next iteration of the emerging Sunderland CSDP, to maximise the contribution of policy HWSS1 to this SA objective it is recommended that further information requirements for HIA should be specified and the policy should not support development proposals where an HIA indicates that they would result in adverse health effects.	The Council will prepare a guidance note on what a HIA should contain. The Policy has also been amended to indicate that development should generally be resisted where the HIA identifies that there would be significant adverse health impacts that could not be adequately mitigated.
Cumulative Effects on SA Objectives	In the next iteration of the emerging Sunderland CSDP, policy HWSS1 should be expanded to clarify the role of HIA's in the determination of relevant planning applications to ensure that health impacts are appropriately treated as material considerations.	The Policy has been amended accordingly. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.

Sustainability Appraisal (2018) (SD6)²⁸³

7.13 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	++	++	+	++	++	+	~	+	~	++	+	~	+	+

7.14 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

7.15 This strategic policy seeks to promote healthy and safe communities within the city and support the delivery of the Council's Joint Health and Wellbeing Strategy (SD17)²⁸⁴ and the emerging Public Health Strategy. The Council recognises that health and wellbeing is a cross cutting theme of the Plan and therefore the policy commits the Council to working closely with key stakeholders, including the NHS, in order to improve the health and wellbeing outcomes of all residents within the city.

²⁸²

[https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636806394702000000](https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636806394702000000)

²⁸³ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

²⁸⁴ https://www.sunderland.gov.uk/media/20855/SD-17-Sunderland-s-Joint-Health-and-Wellbeing-Strategy/pdf/SD.17_Sunderland's_Joint_Health_and_Wellbeing_Strategy.pdf?m=636802939655500000

7.16 Improving the health outcomes of Sunderland residents is one of the key corporate objectives for the Council. The most recently published Health Profile²⁸⁵ for the city published by Public Health England identifies that the health of people in Sunderland is varied compared with the England average. The data demonstrates that Sunderland is one of the 20% most deprived district/unitary authorities in England and about 26% of children live in low income families. Sunderland scores below the national average on the vast majority of health indicators. Life expectancy for both men and women is significantly lower than the England average at 77 for males and 80.9 for females compared to the national averages of 79.5 for males and 83.1 for females. Other particularly problematic measures for Sunderland include childhood obesity rates, alcohol related admissions and mortality rates from cancer and cardiovascular illness. A snapshot of how Sunderland scores against a number of these indicators is set out below:

Table 17 Sunderland Health Profile

Indicator	Sunderland	National Average
1. Obese children (Year 6)	24	9.4
2. Admission episodes for alcohol-specific conditions (under 18s)	115.1	37.4
3. Percentage of physically active adults	50.6	57
4. Excess weight in adults	70.1	64.8
5. Hospital stays for alcohol-related harm	948.5	647
6. Hip fractures in people aged 65 and over	808.1	589
7. Life expectancy at birth (Male)	77	79.5
8. Life expectancy at birth (Female)	80.9	83.1
9. Under 75 mortality rate: cardiovascular	89.8	74.6
10. Under 75 mortality rate: cancer	168.5	138.8

7.17 In addition to the above, the recent Sunderland Adult Health and Lifestyle Survey 2017²⁸⁶ provides more detailed evidence of the health and lifestyle challenges local people face. In order to consider the impacts of the Plan upon health, the Council prepared a Health Impact Assessment (SD.19) for the draft Plan. This was published alongside the Draft Core Strategy and Development Plan in 2017. Whilst the Health Impact Assessment recognised that the policies of the plan were broadly positive in terms of their health impacts, the report did make a number of recommendations on how the plan could further be improved to enhance the positive benefits of the Plan upon health.

7.18 When preparing the Publication Draft of the Plan, the Council considered each of the recommendations of the Health Impact Assessment (SD19)²⁸⁷ in turn and where possible, made amendments to the Plan to address the recommendations made. In June 2018, the Council published a Health Impact Assessment Note (SD20)²⁸⁸ which set out how each of the recommendations of the Health Impact Assessment had been taken into consideration when preparing the Publication Draft of the Plan. This document forms part of the evidence base for the Plan. Due to the importance that the Council places upon improving health and wellbeing of its residents it was considered important to include this strategic policy within the plan to demonstrate how the plan will seek to address the health and wellbeing issues that Sunderland faces, as identified above.

²⁸⁵ <http://fingertipsreports.phe.org.uk/health-profiles/2017/e08000024.pdf>

²⁸⁶ <https://www.sunderland.gov.uk/article/15186/Adults>).

²⁸⁷ [https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_\(2017\).pdf?m=636803846820730000](https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_(2017).pdf?m=636803846820730000)

²⁸⁸ [https://www.sunderland.gov.uk/media/20968/SD-20-Health-Impact-Assessment-Note-2018-/pdf/SD.20_Health_Impact_Assessment_Note_\(2018\).pdf?m=636803847545670000](https://www.sunderland.gov.uk/media/20968/SD-20-Health-Impact-Assessment-Note-2018-/pdf/SD.20_Health_Impact_Assessment_Note_(2018).pdf?m=636803847545670000)

- 7.19 The Council recognise that access to health facilities is important and therefore the policy seeks to protect existing health facilities and support the provision of new or improved facilities. This is particularly important for residents in the more peripheral parts of the city, or those that have mobility issues, for which their local health facilities provide a lifeline. Further clarification on the protection of health facilities (and other community facilities and local services) is provided within the justification for Policy VC5.
- 7.20 The link between planning and health has been set out in the National Planning Policy Framework (NPPF) and is integrated in our Local Plan. At the centre of the NPPF is a presumption in favour of sustainable development, with three dimensions to the concept: economic; social; and environmental. The social role comprises *"supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being"*.
- 7.21 It has been established that the built environment is one of the many interrelated factors that influence people's lifestyle's, behaviour and the choices that they are able to make. (Public Health England [PHE] 2018, Town & Country Planning Association [TCPA] & Local Government Association [LGA] 2016)²⁸⁹. The planning system is one area in which local government can act to facilitate healthy lifestyles. The role of the built environment, the food offers available and access to safe spaces for physical activity for communities are a key element within a whole system approach to improving health outcomes for the population. National planning policy and guidance identifies ways that local Councils can use planning measures to help combat obesity and promote the delivery of healthy weight environments which play a significant part in delivering a "Whole system approach" to tackling obesity (Public Health England 2018).
- 7.22 The Plan seeks to achieve this by providing access to a network of green infrastructure, including Public Rights of Way. Providing multi-purpose facilities which integrate health facilities and other community uses can have positive impact by allowing residents to make joint trips and access facilities in a single location. This makes facilities more accessible to residents and also reduces the need to travel and the distance travelled, providing the benefits of sustainable development. The Council will generally support proposals which seek to integrate such facilities.
- 7.23 The Council recognises that an over proliferation of unhealthy eating outlets can have significant adverse impact upon the health and wellbeing of residents. The Council will therefore seek to manage the location, number and access to unhealthy eating outlets. The justification for Policy VC4 provides a detailed justification for the policy approach proposed in relation to hot food takeaways.
- 7.24 The Council recognises that health and wellbeing issues are wide ranging and should be taken into consideration at the outset. Part 6 of the policy sets out the issues which the Council considers should be taken into consideration when preparing proposals for new development.
- 7.25 The population of Sunderland is ageing with the number of residents aged 65 or over projected to increase by 42.2% between 2015 and 2039 (see SHMA, Update 2017; Para

²⁸⁹ Local Government Association (2018) Developing Healthier Places, How Councils can work with developers to create places that support wellbeing https://www.local.gov.uk/sites/default/files/documents/22%2018%20Developing%20healthier%20places_06.pdf

7.46; page 120 - SD.23²⁹⁰), it is therefore important that new developments are age friendly, inclusive, safe and accessible to all. Ensuring that new development is well designed is also important helping to create a sense of place which people can identify with and which encourages and promotes social interaction.

- 7.26 Development which promotes active travel and other physical activities plays an important role in improving the health and wellbeing of residents and visitors to the city. Through careful design in terms of the layout of development, the location of uses within the site and access to open space positive impacts upon health and wellbeing can be established as an integral part of the development.
- 7.27 Sunderland contains a wide range of natural, built and historic environmental assets which will be conserved through the policies set out within the Plan. Promoting access to these assets will also have positive benefits in terms of health and wellbeing.
- 7.28 Any development has the potential to adversely impact upon the amenity of existing and future residents or occupiers. Through careful design it should be ensured that any impacts are minimised, or where necessary that appropriate mitigation is secured to ensure that any impacts would be at an acceptable level. Further detailed justification is provided within Policies HS1 and HS2 which deal with amenity issues.
- 7.29 Due to the heavy industrial heritage of the area, there is a considerable amount of previously developed land within the city which could come forward for development. The Council recognise that there are benefits of bringing previously developed land back into use and actively promote the reuse of such sites. However, it is also recognised that previous uses have often contaminated sites and therefore it should be ensured that any contamination is appropriately addressed through the planning process. Further information is provided as part of the justification for Policy HS3 which deals specifically with contaminated land.

7.30 The policy requires applicants of large scale developments to undertake a HIA when preparing their development proposals and submit this as part of their application, to ensure that improvements to health and wellbeing are designed into new development from the outset. This was supported by the Health Impact Assessment of the draft Plan (SD19), which recognised the benefits of such an approach.

7.31 A healthy place contributes to the prevention of ill health and provides the environmental conditions to support positive health and wellbeing. The Dahlgren

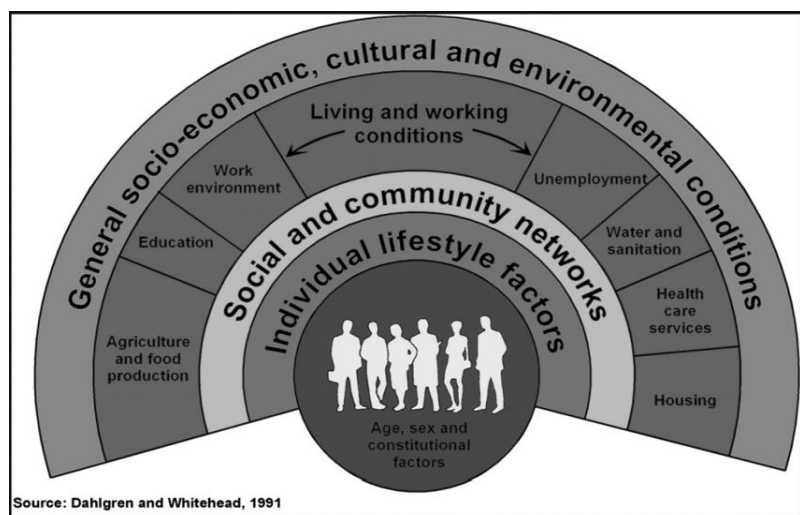


Figure 29 Dahlgren and Whitehead Model

²⁹⁰ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

and Whitehead model²⁹¹ (see Figure 29) highlights the relationship between individual lifestyle behaviours, social networks, working and living conditions and the general socioeconomics, cultural and environmental conditions. While the interaction between these different layers and factors can have both a positive and protective influences on our lives, they can also undermine health and wellbeing for both the individuals and communities.

- 7.32 Potential impacts on health and wellbeing should be identified early in the design of schemes. Health impact Assessments and screening should be undertaken for all major applications likely to give rise to significant health impacts. This will allow schemes to be refined to maximise positive effects on health and wellbeing. Public Health England has noted that “some of the UK’s most pressing health challenges – such as obesity, mental health issues, physical activity and the needs of an ageing population - can be influenced by the quality of our built environment ... the consideration design of spaces and places can help to promote good health; access to goods and services; and alleviate, and in some cases even prevent poor health, and thereby have a positive impact on reducing health inequalities” (Building Better Places; Report of Session 2015-16. Written Evidence (BEN0186) by Public Health England. House of Lords Select Committee on National Policy for the Built Environment)²⁹².
- 7.33 The planning system involves making decisions about the future of cities, towns and the countryside. It is vital to balance the desire to develop areas of where we live and work with ensuring the surrounding environment is not negatively affected, this includes considering the sustainable needs of future communities. The addition of significant number of individuals in a small space and the potential to impact adversely on already over stretched health services such as General Practice or Community Pharmacies, needs to be assessed in order to ensure successful outcomes are achieved, therefore the opportunity to include HIA in Local Planning in large development schemes should be sought.
- 7.34 Originally the draft Plan proposed to only require the submission of a HIA for large scale housing applications (100 dwellings or more), however following the recommendations of the Health Impact Assessment of the draft Plan and several representations, this has been extended to include other large development schemes. Whilst it is recognised that all schemes could potentially have health impacts, the Council recognise that it would be disproportionate to require a HIA to be undertaken for all applications, therefore the threshold set within the policy only requires this to be undertaken for large residential schemes of 100 dwellings or more or for any other forms of development that would require an EIA. As a University city, in recent years the Council has experienced a significant increase in the number of applications for purpose-built student accommodation. In order to ensure that the health impacts of larger student accommodation schemes are carefully considered from the outset, the Council has included a minor modification to the supporting text of the policy which indicates that student accommodation schemes of 100 bedspaces or more would also be considered ‘major development’ for the purposes of the policy. Further guidance on the issues which the Council would expect to be included within a HIA will be set out within a developer guidance note.
- 7.35 It is considered that this policy requirement would only apply to the largest schemes that have the potential to have significant health impacts and who are likely to have an experienced team of development professionals preparing the application. In addition, to

²⁹¹ Dahlgren G, Whitehead M. (1991) Policies and strategies to promote social equity in health. Stockholm: Stockholm Institute for Further Studies.

²⁹² <https://publications.parliament.uk/pa/ld201516/ldselect/ldbuilt/100/100.pdf>

reduce the burden on the developer, the supporting text makes it clear that a HIA should be proportionate to the scale and type of development proposed and may be incorporated into other suitable supporting documents such as a Design and Access Statement.

Reasonable Alternatives

7.36 The Council considered several alternative options when setting the thresholds for the submission of a HIA, as set out below:

- The Council gave consideration to increasing the thresholds for when a HIA would be required, however it was considered that the threshold set within the policy and supporting text is proportionate. Increasing the thresholds further would result in a very limited number of planning applications being required to consider the health impacts of a development from the outset and therefore the opportunity to redesign the development to improve health and wellbeing outcomes would have been lost.
- Consideration was given to reducing the thresholds, which would increase the number of planning applications subject to a HIA. Whilst this would have positive benefits in terms of ensuring that health considerations were considered from the outset, the Council did not want overburden applicants submitting smaller development schemes who may not have the expertise readily available to complete the HIA. Furthermore, the Council was also mindful that there would need to be sufficient capacity available within the Development Management and Public Health Teams to assess the content of any HIA's submitted in support of a planning application.

7.37 It was therefore considered that the HIA thresholds set within the policy and supporting text established the correct balance.

Effective Deliverable

7.38 The policy will be delivered by the Council and range of other stakeholders including the Health and Wellbeing Board, the NHS and the NHS Sunderland Clinical Commissioning Group. The policy will be implemented through the submission and determination of planning applications. Health Impact Assessments submitted in support of a planning application will be assessed by the Council's Public Health Team.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP7	Healthy and safe communities	Sets out how health and wellbeing will be improved	<ul style="list-style-type: none"> • Significant decrease in the life expectancy of residents • Significant decrease in healthy life expectancy of residents • Increasing polarisation of health outcomes • Increase in obesity levels • Significant decrease in 	<ul style="list-style-type: none"> • Identify reasons for the failure to meet policy aims • Identify projects/interventions to address issues • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Life Expectancy at Birth • Obesity Rates • Loss of open space to development (ha) • Air quality • Water quality • Number of hot food takeaway units in the plan area 	<ul style="list-style-type: none"> • LA Health Profiles • SCC Monitoring Data • Public Health England Outcome Frameworks • Air Quality Annual Status Report • National CO₂ emissions • Environment Agency 'Catchment Data Explorer'

			number of health facilities <ul style="list-style-type: none"> • Significant increase in number of hot food takeaways 		<ul style="list-style-type: none"> • Planning applications requiring the submission of a Health Impact Assessment that have had one submitted 	<ul style="list-style-type: none"> • Public Health England Hot Food Takeaway Data
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Consistent with National Policy

7.39 The policy is consistent with Chapter 8 of the NPPF which seeks to promote healthy communities. Specifically the policy seeks to protect existing facilities, promote healthy and active lifestyles, support the integration of community uses and promote accessibility to the natural environment, which is consistent with Paragraphs 69 and 70 of the NPPF.

HS1 Quality of Life and Amenity

7.40 Development has the potential to have significant adverse impacts upon the amenity of local residents and upon their quality of life. The policy seeks to ensure that the amenity of occupiers is protected by only supporting development proposals which would not have unacceptable adverse impacts, or where appropriate mitigation can be provided to ensure that any impacts are made acceptable.

HS1 Quality of Life and Amenity

1. Development must demonstrate that it does not result in unacceptable adverse impacts which cannot be addressed through appropriate mitigation, arising from the following sources:
 - i. air quality;
 - ii. noise;
 - iii. dust;
 - iv. vibration;
 - v. odour;
 - vi. emissions;
 - vii. land contamination and instability;
 - viii. illumination;
 - ix. run-off to protected waters; or
 - x. traffic;
2. development must ensure that the cumulative impact would not result in ~~significant~~ unacceptable adverse impacts on the local community; and
3. development will not normally be supported where the existing neighbouring uses would unacceptably impact on the amenity of future occupants of the proposed development.

Positively Prepared

Vision and Strategic Priorities

7.41 This policy will deliver the spatial vision by helping to create a Sunderland that is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations.

7.42 Policy HS1 will help to deliver Strategic Priority 3.

Draft Plan Comments

7.43 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:

- Developers suggest alternative wording to be consistent with the NPPF.
- Siglion consider the policy to be vague, onerous and replicates EIA regulations.

How Issues Have Been Taken into Account at Publication Draft

7.44 In response to the developers comments, alternative wording has been broadly agreed and included in the revised policy. This includes including reference to mitigation in part 1; reducing the text relating to cumulative impacts in part 2; and including reference to the need for new development to take account of existing neighbouring uses under part 3.

Publication Draft Comments

7.45 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation:

- NHS Sunderland CCG supports the policy (PD70).
- Story Homes, Persimmon Homes and Burdon Lane Consortium support the policy but suggest that wording of criterion 1 and 2 is made consistent (PD5312, PD3973 & PD2325).
- The Coal Authority support Policy HS1 and notification in criteria 1 viii) that issues of land stability should be addressed (PD1251)
- The Minerals Products Association support the policy but indicate it is unclear how the policy relates to scoping for EIA development or the requirements of Policy SP11 (PD4361 & PD4471).

How issues have been taken into account prior to Submission

7.46 In response to the representations raised by Story Homes, Persimmon Homes and Burdon Lane Consortium (PD5312, PD3973 & PD2325), the Council has proposed minor modifications as set out in the Schedule of Modifications (M32). In response to the representations raised by the Mineral Products Association (PD4361 & PD4471), the Council has proposed minor modifications as set out in the Schedule of Modifications (M33). With regard to the representations from the Coal Authority (PD1251), other policies of the plan already address land instability issues.

Proposed Modifications to the Publication Draft

7.47 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
5.6	Where a site is affected by land stability issues (<u>including mineral legacy issues as set out in Policy M3</u>), the responsibility for securing a safe development rests with the developer and/or landowner.	To cross reference to land stability issues identified in Policy M3, as raised by the Mineral Products Association (PD4471).
5.6	Cumulative impacts should also be considered. <u>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).</u>	To address representations submitted by the Mineral product association (PD4378).
HS1	Development must ensure that the cumulative impact would not result in <u>significant unacceptable</u> adverse impacts on the local community	To ensure the Policy is consistent with the NPPF (2012) as highlighted by several representations (including PD3973, PD2325 and PD5312).

Duty to Cooperate (SD11)

7.48 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)²⁹³

7.49 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

7.50 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018)²⁹⁴

7.51 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	~	~	~	++	~	~	++	~	++	+	~	+	+

7.52 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

7.53 Development has the potential to have significant adverse impacts upon the amenity of local residents and upon their quality of life. The policy seeks to ensure that the amenity of occupiers is protected by only supporting development proposals which would not have unacceptable adverse impacts, or where appropriate mitigation can be provided to ensure that any impacts are made acceptable. When considering development proposals, cumulative impacts must also be considered. A minor modification has been proposed to part 2 of the policy to make reference to 'unacceptable' adverse impacts, which ensures consistency with the terminology used in part 1 of the policy and the NPPF.

7.54 The Council recognise that where an existing use is already present on a site any new development in close proximity should be designed in such a way that it does not adversely impact upon the operations of the existing user. This is commonly referred to as the 'agent of change' principle. Examples of this include where particularly sensitive uses such as residential development are proposed close to existing uses such as sewage treatment works, night clubs or mineral extraction facilities where conflicts may arise. Where conflicts are likely to occur, the proposed development should be designed in such a way to mitigate any impacts to an acceptable level. If this is not possible, the proposed development should be refused. The policy seeks to safeguard the operations of existing users in such circumstances and implement the 'agent of change' principle. Additional text has been proposed to provide more clarity on the 'agent of change' principle and how it will apply in the determination of planning applications.

²⁹³

[https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=63680639470200000](https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=63680639470200000)

²⁹⁴ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2018\).pdf?m=63680291143650000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2018).pdf?m=63680291143650000)

Reasonable Alternative

7.55 The Council consider there are no reasonable alternative options.

Effective Deliverable

7.56 The policy will be achieved through the determination of planning applications and by securing necessary mitigation with developers through planning conditions and legal agreements. Where a development is likely to impact upon the considerations set out within part 1 of the policy, the applicant will be expected to submit an assessment to demonstrate what the likely impacts would be and any mitigation measures required to ensure these impacts would be acceptable.

7.57 Any necessary mitigation will be secured through planning conditions and/or legal agreements. The Council will consult with its Environmental Health Officers when considering amenity impacts.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
HS1	Quality of life and amenity	Sets that development should not have an adverse impact on neighbouring uses and take into account existing uses that may have a detrimental impact on development	<ul style="list-style-type: none"> • Significant increase in numbers of developments adversely impacting on quality of life and amenity indicators • Designation of Air Quality Management Area (AQMA) • Significant decrease in air quality • Significant increase in emissions • Significant decrease in water quality 	<ul style="list-style-type: none"> • Identify reasons for increase in proposals for inappropriate development • Review Local Plan requirements and standards for quality of life and amenity • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Air quality • Water quality 	<ul style="list-style-type: none"> • SCC monitoring data (Environmental Health) • Planning applications • Environment Agency • Air Quality Annual Status Report • Water Framework Directive

Consistent with National Policy

7.58 The policy is consistent with Paragraph 17 of the NPPF which sets out the 12 core principles of planning which include that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. The policy is also consistent with Paragraphs 110, 120, 123, 124, 143 and 144 of the NPPF, which seek to ensure that development proposals minimise pollution, noise impacts, protect air quality, safeguard against land instability and contamination issues, dust and vibration.

HS2 Noise- Sensitive Development

7.59 Some types of development are likely to generate significant levels of noise and it is therefore important that they are located within appropriate areas away from uses which are particularly sensitive to excessive levels of noise, such as residential uses. The policy seeks

to manage the location of developments which are likely to generate significant levels of noise.

HS2 Noise-sensitive Development

Development sensitive to noise or which would result in noise impacts (including vibration) will be controlled by implementing the following measures:

1. noise sensitive development will be directed to the most appropriate locations and protected against existing and proposed sources of noise through careful design, layout and uses of materials;
2. noise-sensitive development affected by existing sources of noise should submit an appropriate noise assessment and where necessary, a detailed schedule of mitigation. In assessing such mitigation, account will be taken of:
 - i. the location, design and layout of the proposed development; and
 - ii. measures to reduce noise within the development to acceptable levels, including external areas.
3. In areas of existing low levels of noise, proposals for development which may generate noise should be accompanied by a noise assessment, provide details of the noise levels on the site and quantify the impact on the existing noise environment and noise sensitive receptors. Where necessary an appropriate scheme of mitigation shall detail any measures required to ensure that noise does not adversely impact on these receptors.

Positively Prepared

Vision and Strategic Priorities

7.60 This policy will deliver the spatial vision by helping to create a Sunderland that is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations.

7.61 Policy HS2 will help to deliver Strategic Priority 3.

Draft Plan Comments

7.62 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:

- Developers suggest alternative wording to the policy to allow greater flexibility and allow for Officer judgement.

How issues have been taken into Account at Publication Draft

7.63 Alternative wording has been broadly agreed and included in the revised policy.

Publication Draft Comments

7.64 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation:

- The Minerals Products Association support the policy but feel that it should make clear that proposals should not impact unreasonably on existing uses (PD4378).

How Issues Have Been Taken into account prior to Submission

7.65 In response to the representations raised by the Mineral Products Association (PD4378), the Council has proposed minor modifications as set out in the Schedule of Modifications (M34).

Proposed Modifications to the Publication Draft

7.66 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
5.6	Cumulative impacts should also be considered. Any new developments will be expected to	To address representations submitted by the Mineral product association (PD4378).

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).

Duty to Cooperate (SD11)

7.67 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)²⁹⁵

7.68 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

7.69 The SA made no recommendation for changes to be made to the Draft Plan.

Sustainability Appraisal (2018)²⁹⁶

7.70 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	~	~	~	++	~	~	+	~	~	~	~	~	~

7.71 The SA made no recommendation for changes to be made to the Publication Draft.

Justified

7.72 Some types of development are likely to generate significant levels of noise and it is therefore important that they are located within appropriate areas away from uses which are particularly sensitive to excessive levels of noise, such as residential uses. Similarly, if a noise-sensitive use is proposed, it is also important that such development considers existing neighbouring uses, to consider whether there is likely to be unacceptable noise impacts and whether it is an appropriate form of development within that location.

7.73 The policy therefore seeks to ensure that noise impacts are considered as part of planning decisions and that where noise attenuation measures are required to bring noise levels down to an appropriate level at the closest receptor, these attenuation measures are secured through planning conditions and/or legal agreements.

Reasonable Alternative

7.74 The Council considers that there are no reasonable alternatives.

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[https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=63680639470200000](https://www.sunderland.gov.uk/media/20972/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=63680639470200000)

²⁹⁶ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=63680291143650000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=63680291143650000)

Effective Deliverable

7.75 The policy will be delivered through the submission and determination of planning applications. Where development is likely to have noise impacts, an assessment will be required to support planning applications to identify what the likely impacts will be and any attenuation measures that will bring the noise levels down to an acceptable level. The Council will consult with its Environmental Health Officers when considering noise impacts.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
HS2	Noise-sensitive development	Relates to mitigation requirements relating to noise-sensitive development	<ul style="list-style-type: none"> • Significant numbers of noise-sensitive developments in locations likely to be affected by existing sources of noise • Significant increase in numbers of noise-generating developments in areas of existing low levels of noise 	<ul style="list-style-type: none"> • Identify reasons for increase in proposals for inappropriate development • Review Local Plan policy requirements in relation to noise sensitivity • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications requiring the submission of a Noise Assessment that have had one submitted 	<ul style="list-style-type: none"> • SCC monitoring data (Environmental Health) • Planning applications

Consistent with National Policy

7.76 The policy is consistent with Paragraph 123 of the NPPF which indicates that planning policies should aim to avoid noise from new development, including through the use of conditions and recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established.

HS3 Contaminated Land

7.77 In a heavily built up area such as Sunderland where there has been a history of heavy industry, land contamination is known to exist. The policy therefore seeks to ensure that development on contaminated land is developed safely.

HS3 Contaminated Land

When development is considered to be on contaminated land, development should:

1. ensure all works, including investigation of the nature of any contamination, can be undertaken without the escape of contaminants which could cause unacceptable risk to health or to the environment;
2. identify any existing contaminated land and the level of risk that contaminants pose in relation to the proposed end use and future site users are adequately quantified and addressed;
3. ensure appropriate mitigation measures are identified and implemented which are suitable for the proposed use and that there is no unacceptable risk of pollution within the site or in the surrounding area; and
4. demonstrate that the developed site will be suitable for the proposed use without risk from contaminants

to people, buildings, services or the environment including the apparatus of statutory undertakers.

Positively Prepared

Vision and Strategic Priorities

7.78 This policy will deliver the spatial vision by helping to create a Sunderland that is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations.

7.79 Policy HS3 will help to deliver Strategic Priority 3.

Draft Plan Comments

7.80 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:

- Siglion supports the policy but suggests that it should be aligned with the housing policies.
- Developers also suggested alternative wording to be consistent with the NPPF.

How issues have been taken into account at Publication Draft

7.81 The Council did not consider it necessary to amend the policy to reflect comments raised as the Plan should be read as whole.

Publication Draft Comments

7.82 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation:

- Burdon Lane Consortium and Persimmon Homes support the policy, but recognise decontamination can be costly, so suggest that the policy allows for planning obligations to be reduced if they affect viability (PD2404 & PD3981).
- The Environment Agency supports the policy but would like to see reference to controlled waters (PD214).

How Issues Have Been Taken into account prior to Submission

7.83 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council has signed a Statement of Common Ground with the Environment Agency (SD8k), which agrees that no changes to the policy are required. With regard to the representations from developers, Policy ID2 already allows for planning contributions to be reduced if they would affect viability.

Proposed Modifications to the Publication Draft

7.84 No modifications are proposed.

Duty to Cooperate (SD11)

7.85 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)

7.86 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
Green	Blue	Blue	Blue	Blue	Green	Blue	Yellow	Green	Blue	Blue	Blue	Blue	Blue	Blue

7.87 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA8: Land Use and Soils	To allow Policy E19 – Contaminated Land to contribute to this objective it is recommended that in the next iteration of the emerging Sunderland CSDP the policy should be expanded to include support for the redevelopment of brownfield and contaminated land, providing that development proposals remediate known contamination and do not result in unacceptable health or environmental risks.	Policy has been reworded to support the redevelopment of contaminated land. Policy SP2 seeks to maximise the use of previously developed land.

Sustainability Appraisal (2018)

7.88 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	~	~	~	++	~	++	+	~	~	~	~	~	~

7.89 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

7.90 Due to the industrial heritage of Sunderland, the city contains large areas of land that are contaminated as a result of their previous uses. Whilst the Council supports the redevelopment of these previously developed sites, a number of these are heavily contaminated and are not suitable for development without appropriate remediation of the land taking place first. The policy requires applicants to identify any contamination present on a site and identify mitigation measures to address the contamination to allow the site to be brought forward for development.

Reasonable Alternative

7.91 The Council considers that there are no reasonable alternative options.

Effective

Deliverable

7.92 The Policy will be delivered through the submission and determination of planning applications. Applicants will be required to undertake site investigation works and submit a report of the findings alongside any planning applications that involve potentially contaminated land. Where mitigation measures are required, these will be secured through

planning conditions and/or legal obligations. The Council will consult with its Environmental Health Officers when considering development proposals on contaminated land.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
HS3	Contaminated land	Sets out the requirements relating to development on contaminated land	<ul style="list-style-type: none"> Significant increase in inappropriate ly-mitigated development on contaminate d land 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate developme nt Review Local Plan policy requiremen ts in relation to mitigating land contaminati on Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Area of previously-contaminate d land decontamina ted, reclaimed and brought back into use (ha) 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications Contaminated Land Strategy Environment Agency

Consistent with National Policy

7.93 The policy is consistent with Paragraph 109 of the NPPF which indicates that the planning system should contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

HS4 Health and Safety Executive Areas and Hazardous Substances

7.94 Sites and installations which have quantities of hazardous substances present on site are designated as notifiable by the Health and Safety Executive (HSE). The policy seeks to guide the development of new notifiable installations and development proposed within HSE consultation zones.

HS4 Health and Safety Executive Areas and Hazardous Substances

1. Development within the specified distances from sites identified as 'notifiable installations', must take account of any risks involved and the need for appropriate separation between hazardous installations and incompatible uses.
2. The development of new notifiable installations must be located in appropriate areas and take account of any risks involved and the need for appropriate separation between hazardous installations and incompatible uses.
3. Development involving the introduction, storage or use of hazardous substances which would create potential risk and could not be acceptably mitigated against, will not be permitted.

Positively Prepared

Vision and Strategic Priorities

7.95 This policy will deliver the spatial vision by helping to create a Sunderland that is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations.

7.96 Policy HS3 will help to deliver Strategic Priority 3.

Draft Plan Comments

7.97 As set out in the Consultation Statement (SD07), no issues were raised during the draft Plan consultation.

Publication Draft Comments

7.98 As set out in the Consultation Statement (SD07), no key issues were raised against Policy HS4.

Duty to Cooperate (SD11)

7.99 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)

7.100 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

7.101 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD6)²⁹⁷

7.102 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	~	~	~	++	~	~	+	~	~	~	~	~	~

7.103 The SA made no recommendations for changes to be made to the Publication Draft.

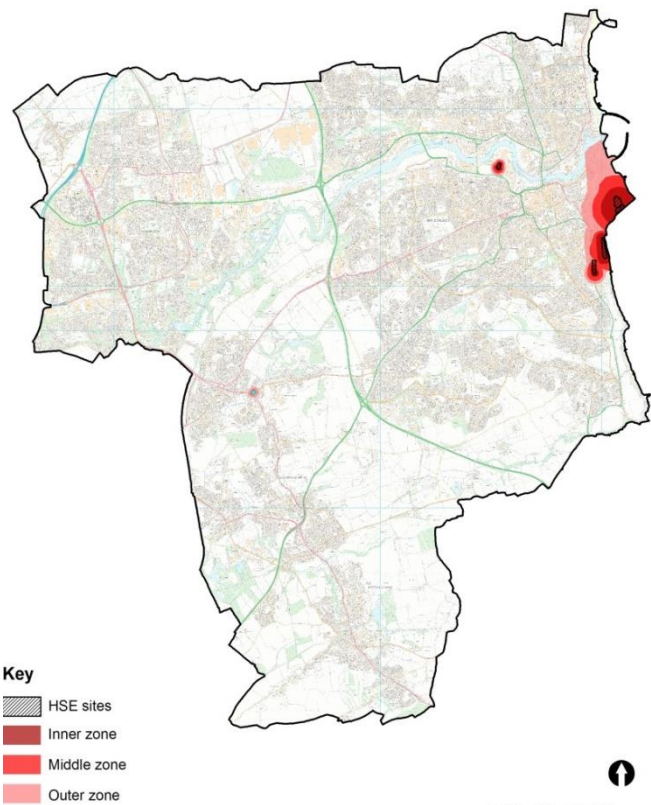
Justified

7.104 Sites and installations which have quantities of hazardous substances present on site are designated as notifiable installations by the Health and Safety Executive (HSE). Consultation zones are defined around these hazardous installations and the Council is required to consult with the HSE on certain proposals for development within these zones. There are currently five notifiable installations within Sunderland. A map showing the spatial distribution of existing notifiable installations in Sunderland and their respective consultation zones is shown in Figure 30.

²⁹⁷ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=63680291143650000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=63680291143650000)

7.105 The Council will be guided by HSE advice in determining whether a proposed development may proceed as submitted or whether protection measures could overcome any safety objections.

7.106 The siting of any new notifiable installations needs to be carefully managed to ensure that installations are not located close to sensitive land uses, which would be incompatible with such development. The policy seeks to ensure that any notifiable installations are located in appropriate locations and that an acceptable separation distance is maintained with incompatible uses.



Reasonable Alternative

7.107 The Council considers that there are no reasonable alternative options.

Effective Deliverable

7.108 The policy will be delivered through the determination of planning applications for new notifiable installations and other types of development proposed within the buffer zones of existing installations.

Figure 30 HSE Notifiable Installations in Sunderland

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
HS4	Health and safety executive areas and hazardous substances	Sets out the key requirements relating to development within HSE areas and areas involving hazardous substances	<ul style="list-style-type: none"> Significant increase in hazardous substance installations in inappropriate locations Significant increase in incompatible development uses within close proximity to hazardous substance installations 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review Local Plan policy requirements in relation to hazardous substance installations Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Planning applications approved within HSE zones contrary to those HSE zones 	<ul style="list-style-type: none"> SCC monitoring data (Environmental Health) Planning applications Health & Safety Executive (HSE)

Consistent with National Policy

7.109 The policy is consistent with Paragraph 172 of the NPPF which indicates that planning policies should be based on the location of major hazards and on the mitigation of the consequences of major accidents.

8.Homes

SP8 Housing Supply and Delivery

- 8.1 To ensure the Council can meet its minimum housing target, Policy SP8 sets out the numerous supply mechanisms that will assist in delivering this target and the measures that would be put in place if this target was not being met.

SP8 Housing Supply and Delivery

The council will work with partners and landowners to seek to exceed the minimum target of 745 additional dwellings per year. The new homes to meet Sunderland's need will be achieved by:

1. the development of sites identified in the SHLAA;
2. the development of sites allocated in the A&D Plan;
3. the development of sites (Strategic and Housing Growth Areas) allocated in this Plan;
4. the conversion and change of use of properties;
5. the development of windfall sites; and
6. the development of small sites.

Positively Prepared

Vision and Strategic Priorities

- 8.2 This policy will deliver the spatial vision and strategic priorities by helping to increase population levels and housing choice, to offer a mix of good quality housing of the types, sizes and tenures that meet communities needs
- 8.3 Policy SP8 will help to deliver Strategic Priorities 1, 2 and 4

Draft Plan Comments

- 8.4 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;
- Brownfield development should be prioritised.
 - The Council should consider Gentoo sites in advance of Brownfield Land.
 - There are no exceptional circumstances to amend the Green Belt Boundary.
 - Empty properties should be bought back into use.
 - Developers/landowners including Story Homes and Persimmon Homes broadly supported the policy and the Plans strategy for delivering housing. Some developers including Story Homes questioned the inconsistency in the Plan and the Experian jobs forecasts and sought additional explanation. Developers also suggested an alternative OAN of 880per annum.
 - Developers suggested the policy should be amended to state that the housing requirement would be a minimum.
 - Stakeholders including University of Sunderland supported the policy.
 - Statutory bodies including Highways England and Historic England supported the policy. Historic England supported the strategy to bring empty properties in the city back into use. Highways England requested that the policy was amended to include reference to developments being of a higher density if they were in close proximity to sustainable transport hubs.
 - Alternative sites were also suggested by developers including ABP Property who suggested Dixon Square.
 - A resident suggested the Council consider Southwick Primary School.

How Issues Have Been Taken into Account at Publication Draft

8.5 In response to the comments raised, the Publication Draft Policy H1 has been removed from the Plan, as it is repetition of other policies in the Plan. However the Council has addressed the wider housing issues raised in the Plan by:

- Considering through the SHLAA the sites suggested through the consultation including Dixon Square and Southwick School and have included them in the housing supply.
- Updating Policy SP8 to include the updated annual housing requirement target and state that this is a minimum target. The Plan should be read as a whole and therefore the Council does not feel it necessary to repeat this text in other policies.
- Amending Policy SP1 to reflect that development should be of a higher density in locations with sustainable transport links.
- To reflect Highways England comments Policy H1 indicates that proposals should be developed at a density which is appropriate for its location. Policy SP1 has been amended to indicate that higher densities close to transport hubs will be encouraged.
- The Council has calculated its objectively assessed housing needs in accordance with Government guidance contained within the NPPF and PPG. The justification for revised the OAHN figure within the Publication Plan is set out within the SHMA Addendum 2018 (SD24).

Publication Draft Comments

8.6 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Miller Homes support the policy (PD890). Most housebuilders supported the policy but considered the target too low. Karbon Homes (PD3385) support the policy and acknowledge that the requirement exceeds the Government's standardised methodology and is therefore positively prepared.
- The Central Gospel Hall Trust (PD147) supports Policy SP8 in terms of the amount and spatial distribution of new housing and the range of sources of housing supply which are consistent with national policy. The Trust also supported the reference to the contribution that windfall sites, particularly on previously developed land can make to the housing supply.
- Burdon Lane Consortium (PD 2421), Esh Developments (PD1850), Hellens Land Ltd (PD4885) and Taylor Wimpey (PD3590) welcomed the use of an employment-led scenario for the OAHN and agreed that the number should be represented as a minimum and could go higher which would go further towards meeting identified affordable housing need. Hellens Land Ltd (PD4885) stated that the OAHN for Sunderland is greater than the 745 dpa identified within the SHMA Addendum and the OAHN identified by Sunderland.
- Story Homes (PD977) broadly support Policy SP8 and the minimum housing requirement of 745dpa, however would consider that a minimum housing requirement of 880dpa is needed. The Council's approach to not using the standardised methodology is supported.
- Barratt David Wilson Homes supports the approach to exceed the minimum target but have concerns that the Plan can only just meet the target (PD5382). The target and buffer is insufficient as there are delivery concerns regarding the sites and SHLAA.
- Persimmon (PD3996) generally support the identification of the housing requirement inclusive of economic growth aspirations and the principle of seeking to exceed this, however they consider the requirement is too low. The Home Builders Federation (PD1183) generally supports the Council's ambition to work with partners and landowners to exceed the minimum target but also consider that the housing requirement is too low and requires further consideration. Bellway Homes (PD1888) supports the proactive approach, but also states the housing requirement is too low.

- Wynyard Homes 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, Wynyard Homes would like land at Quarry House Lane to be included as a Housing Growth Area and would like the site to be assessed as part of the SHLAA (PD4697).
- Bellway Homes (PD1888) suggests that the policy needs to make reference to the need to safeguard sites for future residential development and Barratt David Wilson Homes (PD5382) also suggest reference to releasing safeguarded land to meet housing need.
- Barratt David Wilson Homes (PD5382) also suggested that a definition of 'sustained under-performance' should be set out within the Plan.
- O+H Properties raised concerns over two strategic sites not included (PD4219). They proposed the Groves site be included as a strategic allocation in the Plan as allocating the site in the future Site Allocations Plan would leave a policy vacuum, as site does not currently feature in the Core Strategy. They also suggested a draft policy. In addition the consultancy suggested that a full explanation be provided why the proposed Green Belt site at Newbottle was not considered at Stage 3 Green Belt Review.
- The Church Commissioners for England (PD5245) support the approach to release sites from Green Belt to meet housing requirement, however disagree that the most suitable sites have been chosen. They consider that Phase 2 of South of Ryhope site should be deleted from Green Belt and included as a housing allocation. They disagree with the scoring detailed in the 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. The Church Commissioners also suggested that the SHLAA sites should be included within the Policies Map (PD1776).
- A developer, Mr. Delaney (PD31, PD32 & PD33) supported criterion 1 but concerned that sites are not allocated in this plan, especially site 464B and states that it should be allocated. He also suggested that criterion 3 should be amended to allow other sites to come forward. Criterion 5 was supported but an additional criterion was suggested to ensure that self-build dwellings should not be limited to a proportion of larger sites. It was also suggested that the policy should make a commitment to small and medium builders, in line with the NPPF which requires that 20 percent of allocations should be half a hectare or less.
- The Home Builders Federation (PD4522) 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.
- Springwell Village Residents Association (PD5036) raised concerns with Policy SP8 as there is no evidence to deviate from the standardised methodology and is therefore not justified or effective.
- Friends of Sunderland Green Belt (PD3016) raised concerns over the Council exceeding a minimum target if that target involves the deletion of Green Belt land, as this would cause greater harm than benefit.
- Sunderland Civic Society (PD987) state that Policy SP8 is not justified due to the annual target being greater than the baseline requirement. The Society do not agree with reference to the target being a minimum, as exceeding the target would exacerbate the adverse consequences for the city and be damaging to the stability of the housing market, regeneration, sustainable development, containment of the built up area and integrity of the Green Belt.
- Historic England (PD99) welcomed the intention to work closely with owners of empty properties to encourage reoccupation. Highways England suggested further modelling work is needed on the Strategic Road Network.

- A resident (PD78) disagreed with housing development proposed on Green Belt sites as the level of housing development would have significant impacts on local amenities (GPs, schools and shops) and transport provision and infrastructure. A resident (PD77) concerned over the development of a site at Seaburn for housing, (Seaburn playing fields) and a further resident (PD8498) expressed concerns over the consultation process being inadequate and the seafront lacking facilities as well as bus services no longer using Park Lane Interchange. The resident also considers that there is scope to develop on brownfield land rather than Green Belt and green field sites and does not agree with the term safeguarded land.
- Mrs. Swinburn (PD1498) expressed concerns that a site they put forward within the Green Belt has not been included within the supply.

How Issues Have Been Taken into account prior to Submission

- 8.7 In response to the representations raised by the majority of house builders, the Council does not feel it necessary to make any modifications as the housing requirement set out within the plan is consistent with the Council's latest OAHN calculation which is contained with the SHMA Addendum 2018 (SD24) and is considered to be realistic and achievable. Policy SP8 specifies that the target of 745 additional dwellings per year is a minimum. The allowance for small sites of 50 units per year is considered appropriate and is evidenced through the SHLAA. The SHLAA (SD22) indicates on average over the past 5 years 47 units are delivered each year.
- 8.8 In response to the representations raised by Springwell Village Residents Association, Friends of Sunderland Green Belt and Sunderland Civic Society, the Council does not feel it necessary to make any modifications as due to the shortfall in the housing supply, Green Belt deletions are required to meet the housing target of 745 net additional dwellings per year. No additional Green Belt land over and above that already indicated through the plan will be deleted to exceed this target. The Council considers that exceptional circumstances exist which justify an amendment to the Green Belt.
- 8.9 In response to the representations raised by Wynyard Homes, the Council does not feel it necessary to make any modifications as 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. In response to the representations raised by Bellway Homes (PD1888) and Barratt David Wilson Homes (PD5382) in relation to safeguarded land, the Council has proposed additional modifications as set out in the Schedule of Modifications (M35).
- 8.10 With reference to 'sustained under performance', the definition of this is set out within the Council's Monitoring Report.
- 8.11 In response to the representations raised by O+H Properties the Council does not feel it necessary to make any modifications as the Plan allocates sites it intends to remove from the Green Belt 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 Green Belt site referenced in the representation was discounted at stage 2 as it performs strongly against Green Belt purposes.
- 8.12 In response to the representations raised by the Church Commissioners, the Council does not feel it necessary to make any modifications as the evidence indicates that the site at South Ryhope site 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.

- 8.13 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.
- 8.14 In response to the representations raised by the Church Commissioners on the Policies Map, the Council does not feel it necessary to make any modifications as 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.
- 8.15 In response to the representations raised by the developer Mr. Delaney, the Council does not feel it necessary to make any modifications as 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. It is 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 criterions.
- 8.16 In response to the representations raised by Mr. Delaney in relation to self-build, the Council has proposed an additional modification as set out in the Schedule of Modifications (M38 & M94).
- 8.17 In response to the representations raised by a resident on development sites at Seaburn, the Council does not feel it necessary to make any modifications as the SHLAA (SD22) does identify the site (Seaburn playing fields) as a deliverable housing development, however it is the Allocations and Designation Plan that will allocate sites. In regards to this site, a planning application is currently under consideration.
- 8.18 In response to the representations raised by the late Mrs. Swinburn, the Council does not feel it necessary to make any modifications as the site is considered fundamental to the purposes of the Green Belt and a strong robust boundary is in place and should be retained.
- 8.19 Following representations submitted by Highways England 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 & 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 and prepare a Memorandum of Understanding.

Proposed Modifications to the Publication Draft

8.20 The Council proposes the following modification:

Policy/ Para/ Figure	Proposed Change	Justification
6.9	Review of the Plan and, appropriate	To address representations submitted by

evidence and consideration of the release of safeguarded land.	Barratt David Wilson Homes and Bellway Homes (PD1888 and PD5382).
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Duty to Cooperate (SD11)

- 8.21 Several neighbouring authorities have requested that further information is provided regarding the assumptions over commuting and migration rates associated with the levels of growth proposed within the CSDP. The Council has held regular meetings with neighbouring authorities, which included discussions on these matters. In addition, specific detailed discussions have been held with Gateshead Council and Durham County Council regarding the modelling used in the calculation of the OAHN and the fact that an uplift has been included to the demographic baseline within its housing requirement to support economic growth, including the IAMP.
- 8.22 Due to the regional significance of the IAMP, Sunderland City Council are committed to undertaking further impact work as the development progresses and more evidence is available regarding the potential impacts.

Sustainability Appraisal (2017)

8.23 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
?	?						?	?	?				?	?

8.24 The SA made the following recommendation for changes to be made to the draft Plan: Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	To ensure that residential development proposals do not result in adverse biodiversity impacts, in the next iteration of the emerging Sunderland CSDP policy H2 should be expanded to define the term " <i>appropriate sites</i> " and include appropriate acceptability criteria, including in relation to the protection of biodiversity and geodiversity interests. In doing so the revised policy should clarify that residential development proposals should accord with all other relevant policies within the Sunderland CSDP.	Reference to 'appropriate' sites has been removed from the equivalent policy, which has been amended to set out the types of sites that will deliver the Policy. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.
SA2: Housing	To address identified uncertainties, in the next iteration of the emerging Sunderland CSDP Policy H2 should explain the Council's housing land strategy and set out mechanisms to ensure that a five-year land supply is maintained at all times.	The Policy has been amended to set out types of sites that will deliver the policy. The requirement for maintaining a 5 year supply is set out within the NPPF and it is therefore not considered necessary to repeat this within the Policy, however reference is made to this within the supporting text. The Monitoring Framework indicates

		how the Council will monitor and implement this policy to ensure a five-year supply is maintained at all times.
SA8: Land Use and Soils	In the next iteration of the emerging Sunderland CSDP policy H2 should be expanded to define the term " <i>appropriate sites</i> " and include appropriate acceptability criteria. In doing so the revised policy should clarify that residential development proposals should accord with all other relevant policies within the Sunderland CSDP To further enhance the effectiveness of the policy it should be expanded to include acceptability criteria for all residential development proposals, including those intended to meet the specified housing targets.	Reference to 'appropriate' sites has been removed from the policy. The Policy has been amended to set out the types of sites that will deliver the Policy. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.
SA9: Water	In the next iteration of the emerging Sunderland CSDP policy H2 should be expanded to define the term " <i>appropriate sites</i> " and include appropriate acceptability criteria, including in relation to the protection and enhancement of the water environment. In doing so the revised policy should clarify that residential development proposals should accord with all other relevant policies within the Sunderland CSDP To further enhance the effectiveness of the policy it should be expanded to include acceptability criteria for all residential development proposals, including those intended to meet the specified housing targets.	Reference to 'appropriate' sites has been removed from the policy. The Policy has been amended to set out the types of sites that will deliver the Policy. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan. The overlap and inconsistency previously with policies CM4-7 has been eliminated. Run-off rates is clarified in CM5 which deals with water management. The Plan has been amended in relation to waste water treatment to ensure an appropriate buffer is maintained to amenity receptors.
SA10: Flood Risk and Coastal Erosion	In the next iteration of the emerging Sunderland CSDP, to ensure housing delivery minimises flood risks policy H2 should be expanded define the term " <i>appropriate sites</i> " in relation to sites for housing proposals to both meet or exceed housing supply targets. In doing so the policy should cross-reference the Sequential and Exception Test requirements of policies CM4, CM5 and the NPPF.	Reference to 'appropriate' sites has been removed from the equivalent to Policy H2. The Policy has been amended to set out the types of sites that will deliver the Policy. The Plan should be read as whole and it is therefore not deemed necessary to cross reference to other policies within the Plan.

Sustainability Appraisal (2018) (SD6)

8.25 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
-	+	++	~	~	~	~	-	-	-	~	~	~	-	-

8.26 The SA made the following recommendation for changes to be made to the Publication Draft: Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
This policy should be expanded to confirm that sites contained within Sunderland's SHLAA will be considered for allocation separately within the A&D Plan and will be subject to SA through that allocation process. The policy or supporting text should also be expanded to require windfall and small site applications to accord with all relevant policies within the CSDP.	Recommendation agreed and implemented.

Justified

- 8.27 This policy seeks to identify how 745 additional homes will be delivered per annum. The housing requirement contained within the policy is consistent with the Council's OAHN calculation set out within the SHMA Addendum (2018)(SD24)²⁹⁸. A detailed justification for the housing requirement within the Plan is set out for Policy SP1 of this compliance paper.
- 8.28 Following the publication of the revised 2018 SHLAA (SD22)²⁹⁹, the supply in the early years of the Plan has improved significantly, which has allowed the Council to set a standard requirement across the plan period, whilst ensuring that the Council can continue to maintain a rolling five-year supply throughout the Plan period. The supply to meet this minimum housing requirement is based upon the SHLAA, however it is considered unrealistic to expect the deliverability and developability of every SHLAA site to develop out according to the SHLAA 2018 assessment.
- 8.29 The SHLAA (SD22) is assessed at a point in time, based on the best available evidence and information and it is inevitable that difficulties may occur in bringing sites forward, as sites will lapse, viability will change and detailed site investigations may stall or delay sites. To rely purely on the SHLAA supply coming forward as anticipated without any flexibility may put the Plan at risk, as such building in a flexibility factor which will bolster the supply is considered reasonable and necessary to guard against under delivery. The flexibility factor, which has been applied to the remaining SHLAA supply takes into account circumstances such as planning permissions lapsing and site unknowns. The policy recognises that this target is a minimum and should this be met this will not restrict additional housing sites coming forward provided they are compliant with the other relevant Policies within the plan. Achieving this housing target will be through a number of mechanisms.

Strategic Housing Land Availability Assessment (SHLAA)

- 8.30 The sites set out within the SHLAA (SD22) are all subject to assessment in line with the methodology which was endorsed by the SHLAA Partnership in 2016 to assess their deliverability. Sites are updated on an annual basis and then discussed with the SHLAA panel and suggested changes are incorporated where necessary.
- 8.31 Following the assessment of all sites, the development potential of all the sites is utilised to produce an indicative housing trajectory, which sets out how much housing can be provided

²⁹⁸ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

²⁹⁹ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

and at what point in the future. The current SHLAA (2018) (SD22)³⁰⁰ (para 5.5, pg 29), indicates a housing supply of 10,225 dwellings units, of which 3,891 are deliverable within years 1-5, 3,741 developable in years 6-10 and 2,593 developable in years 11-15

8.32 As the Local Plan is being prepared in three parts, it is anticipated that the majority of this supply identified through the SHLAA will be allocated in Part 2, the Allocations and Designations Plan.

Five-year housing land supply

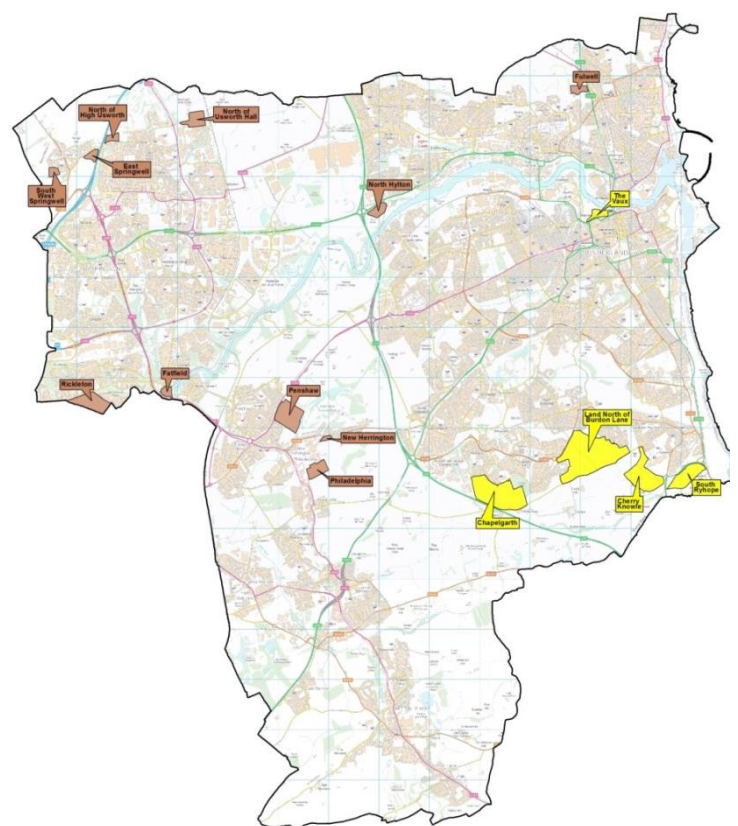
8.33 The Council’s five-year housing supply as set out in the SHLAA (2018) (SD22) (section 6, pg34-35), takes into account the dwellings that are remaining on sites that are currently under construction, sites that have planning permission and those sites that are pending approval or have strong developer interest. In addition to these an allowance for small sites of 50 dwellings per year has been factored in (the justification for these small sites is set out below) and the demolition forecast has been deducted.

Table 18 Five year land supply

	1-5 Years
SHLAA Deliverable units under construction	991
SHLAA Deliverable units with consent	1,687
SHLAA Deliverable units pending approval/strong developer interest	1,213
Small Sites	250
Demolition Forecast	-21
5 year supply total (excluding Student Accommodation)	4,120

8.34 The housing requirement for the first five years of the Plan is 3,725 dwellings, once the over-provision of dwellings (244) for 2015-2018 has been deducted from this requirement and a 5% buffer applied for potential under-delivery, the housing requirement equates to 3,655 dwellings, when set against the supply this results in a five-year land supply of 5.6 years.

8.35 A number of the sites that are currently under construction or have planning consent will continue to be built out into years six and seven as well as those sites that are anticipated to start in the back end of the five-year period (which have strong developer interest), as such it is considered that a rolling supply of sites is in place.



Site allocations in this plan

³⁰⁰ https://www.sunderland.gov.uk/media/20860/SD-22-Strategic/pdf/SD.22_Strategic_Housing_Land_Availability_Assessment

Figure 31 Core Strategy and Development Plan allocations

Sunderland City Council 100018385. Published 2018.

8.36 This Plan is Part 1 of the Local Plan, and allocates Strategic Sites and Housing Growth Areas which will also contribute to meeting the housing target. 3,816³⁰¹ dwellings contribute to the housing supply through these site allocations, 2,486 dwellings from Strategic Sites, (which includes the Vaux site and South Sunderland Growth Area) and 1,330 from Housing Growth Areas SHLAA (2018), (SD22) (pg 31) Housing Trajectory. The location of these Strategic Sites and Housing Growth Areas are shown in Figure 31.

Conversion and change of use

8.37 Not all new dwellings are from new build, an average³⁰² of 95 dwelling units (net) are provided each year through the conversion or change of use of existing buildings, ranging from one or two units above a shop to large office blocks converting to residential units under permitted development rights which contribute to the city’s overall housing supply.

Table 19 Residential Conversion and Change of Use losses and gains

	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018
Change of Use Gain	44	64	53	134	58
Change of Use loss	0	0	-1	0	0
Residential Split Gain	46	16	11	19	37
Residential Split Loss	-1	-3	-2	-4	-5
Total	89	77	61	149	90
Average					93

Windfall sites

8.38 Windfall sites do contribute to the overall supply as not every housing proposal is known at the time of the SHLAA preparation, sites become unexpectedly available and buildings become vacant providing opportunities for residential units to be created. However, the SHLAA is considered to be sufficiently comprehensive enough that sites of five units or more are identified through that process and those sites that come forward with planning permission are included through annual updates. As there is no compelling evidence that windfall sites will consistently become available in the next five year period, a windfall allowance has not been accounted for within the supply (SHLAA 2018) (SD22),(para 4.65-4.66, pg 24).

Small Sites

8.39 Small housing sites (4 units or less) also contribute to the housing supply in the form of new build, change of uses and residential splits. These small sites are excluded from the SHLAA as the SHLAA has a site threshold of 0.25 hectares or 5 units or more. Over the past five years an average of 47 dwellings each year have been delivered on small sites and it is anticipated that this will continue over the plan period. As such a small sites allowance of 50 dwellings per year has been included within the housing supply. SHLAA para 4.67-4.69, pg 24-25 (SD22).

Table 20 Small Sites

Year	Total Gains	Total Losses	Net
2013/14	35	1	34
2014/15	57	3	54
2015/16	44	4	40
2016/17	48	0	48

³⁰¹ The Strategic sites are sites that form part of the current SHLAA supply and as such the 2,486 dwellings are included within the 10,225 total.

³⁰² SCC planning records based on five year average and excluding student housing

2017/18	63	5	58
2013/14-2017/18	247	13	234
Average annual small sites	47		

Housing loss

8.40 In addition to change of use and conversions contributing to the housing supply, stock can also be lost through these mechanisms and as such when including an allowance for change of use and conversions a net figure has been applied. As the Plan includes an allowance for small sites, this also considers the total losses to the stock to get an overall picture of on average, how many units are delivered on small sites.

8.41 In relation to losses to the housing stock, Sunderland has experienced substantial demolitions over the past 15 years as a result of significant stock clearance and renewal undertaken by the largest registered provider within the city, Gentoo. However, large scale demolitions are no longer anticipated to occur going forward and only a small number of demolitions are due to take place within the next five years, which have been discounted from the supply. However, it is considered appropriate to account for a nominal loss attributable to demolitions from year 6 onwards as they can unexpectedly come forward.

8.42 Past evidence has indicated that when discounting the large scale demolitions undertaken by Gentoo an average of 22 properties were demolished per year. As such a loss of 20 units per year from year 6 have been discounted from the housing supply (SHLAA 2018) (PD22) (para 4.70-4.72, pg 25-26).

Table 21 Residential loss when discounting Gentoo

Year	Overall Loss	Gentoo loss	Loss without Gentoo
2007/08	566	551	15
2008/09	527	444	83
2009/10	216	162	54
2010/11	343	98	245
2011/12	278	487	-209
2012/13	202	187	15
2013/14	3	80	-77
2014/15	0	46	-46
2015/16	24	5	19
2016/17	38	39	-1
2017/18	153	2	151
			249
			Average 22 units per year

The Housing Supply

8.43 The housing trajectory identifies what makes up the city's housing supply and how this will meet the housing target.

SHLAA Trajectory 2015/16 to 2032/33

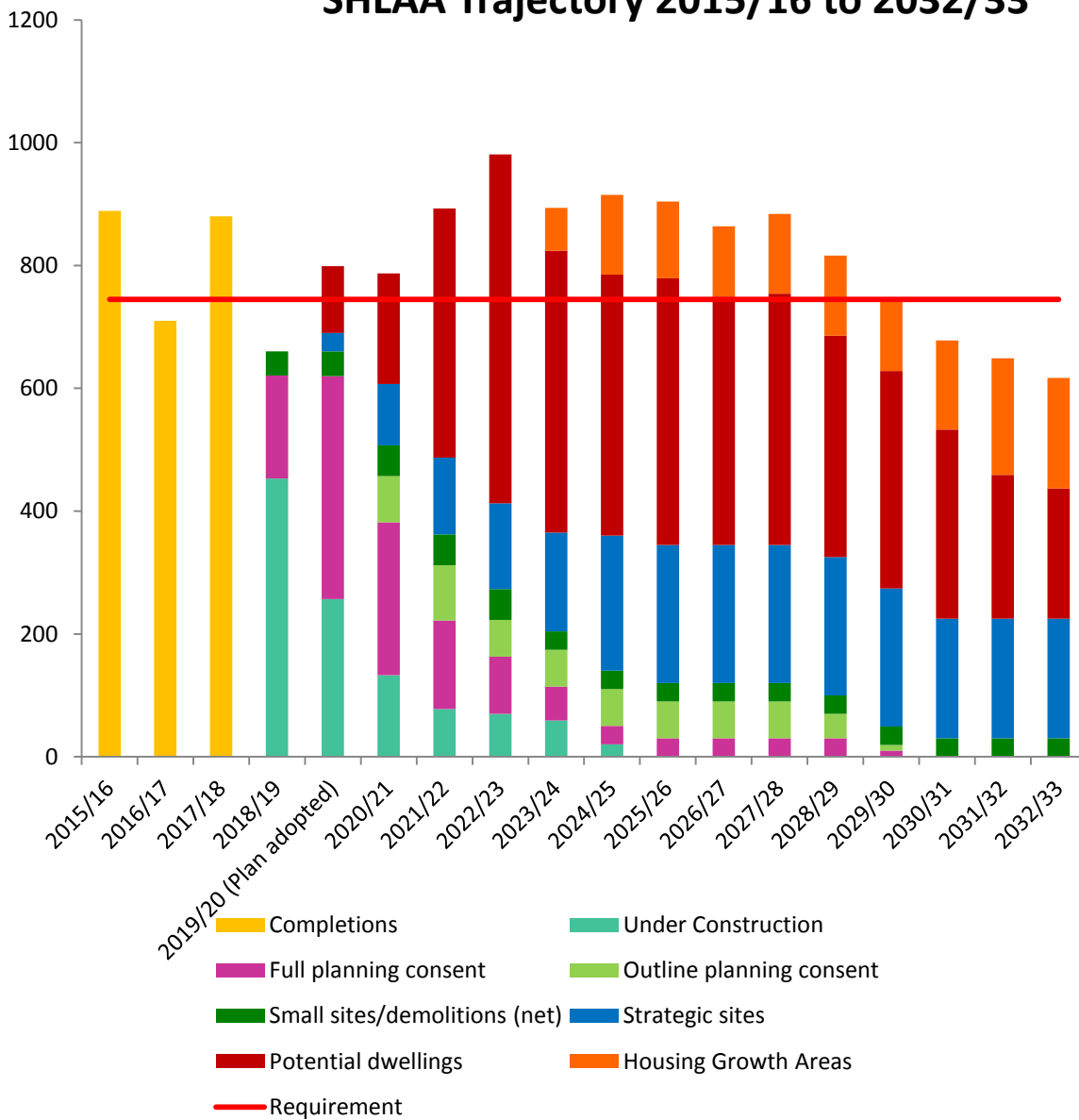


Figure 32 Housing Trajectory

8.44 The following table sets out in detail how the housing supply is made up.

Table 22 Housing Supply

Source	Dwelling numbers	
	2015/16-2017/18	2018/19-2032/33
Completions	2,479	
SHLAA units under construction		1,070
Outline planning permission		1,214
Full planning permission		1,232
Small sites		750
Demolitions		-221
Strategic sites		2,486
Other SHLAA sites		4,223
Housing Growth Areas		1,330

Dwellings	2,479	12,084
Total dwellings	14,563	

- 8.45 Of the 13,410 dwellings required over the Plan period 2,479 dwellings have already been delivered from the beginning of the Plan period 2015/16-2017/18. As part of the SHLAA supply just over 1,000 dwellings are still to be built out on sites that are currently under construction and a number of sites already have planning permission in place, but are yet to start, 1,214 dwellings with outline consent and 1,232 dwellings with full planning consent. Strategic sites contribute a further 2,486 dwellings to the supply over the plan period (of which 1,831 of these already have some form of planning consent).
- 8.46 Other potential dwellings are those which have been identified within the SHLAA as being either deliverable or developable within the Plan period and as such these account for 4,223 dwellings. Small sites contribute 50 dwellings each year and 21 demolitions are expected within the next two years and then an allowance of 20 demolitions per year have been accounted for from year 6. The Housing Growth Areas contribute a further 1,330 dwellings to the supply over the Plan period,(SHLAA 2018) (SD22) (chapter 5, pg 29-32), resulting in a supply of 14,563 dwellings over the Plan period.

Reasonable Alternatives

- 8.47 There are reasonable alternatives in relation to the level and phasing of housing targets, however this could put at risk shortfalls in the housing supply and potentially unsustainable sites being put forward for development. Conversely, the identification of a minimum housing target does not prevent a higher level of housing from being provided if required, but setting a higher minimum housing target may not translate into higher levels of population or economic growth due to displacement effects and the position of Sunderland within wider regional labour markets.
- 8.48 A reasonable alternative in terms of including a lower minimum housing target within Policy SP8 would mean that the Council would be unable to meet their OAHN in full. This would have avoided the need to release strategic Housing Growth Areas from the existing Green Belt. However, this approach was not considered to be appropriate as it would lead to a clear shortage of housing supply within the area during the Plan period and would also be likely to result in a continuation of net outward migration and population decline, which are trends which the Council wishes to address.
- 8.49 Consideration has been given to neighbouring authorities taking a proportion of the city's housing requirement. However, as all neighbouring authorities have/or will need to amend their own Green Belt boundaries through their own respective plan's to meet their own development needs it was not considered reasonable to ask these authorities to further develop in their own Green Belt to accommodate Sunderland's needs, especially when the Council's Green Belt Review has identified areas which can be released from the Green Belt without undermining its integrity.
- 8.50 As detailed in Section 2.2 of Appendix E of the Sustainability Appraisal 2018 (SD5) and noted within Policy SP8, the Council has identified a range of sources to both deliver the identified minimum housing target and ensure this delivery supports the plan's wider spatial strategy. This includes the delivery of housing on sites identified within the Council's SHLAA 2018 (SD22), including presently unconsented sites for which there is inherently a degree of uncertainty.

- 8.51 In consequence, the Council have identified the need to apply a flexibility factor above the OAHN (13,410). Coupled with the need for housing to support the delivery of the Council's wider spatial strategy, this necessitates allocating 11 Housing Growth Areas within the Plan, to which there is no reasonable alternative. The minimum housing target stated within the Plan remains at 13,410, with a flexibility factor provided with respect to the housing supply through the release of suitable Green Belt land to ensure that sufficient housing is delivered over the Plan period to meet the OAHN as a minimum target. As detailed in Appendix E of the Sustainability Appraisal 2018 (SD5), the non-inclusion of the proposed Housing Growth Area allocations would reduce the housing land supply and therefore be likely to impede the delivery of sufficient housing to meet at least the OAHN. This would also not support the implementation of the proposed spatial strategy.
- 8.52 A further alternative which was considered would have been to allocate the full set of housing sites required to meet the Council's OAHN within the Plan, i.e. all urban sites currently listed within the Council's 2018 SHLAA (SD22), as well as the strategic and Green Belt release sites which are proposed for allocation. Whilst technically being a reasonable alternative (and therefore subject to consideration below), this could have resulted in substantial delays in its preparation owing to the additional work required to assess many more potential housing sites and further allocations. The Council therefore decided to allocate housing sites considered 'non-strategic' later in the Allocations & Designations Plan ('the A&D Plan') which will be prepared in 2019. A separate SA, incorporating SEA, will be undertaken of the A&D Plan in due course.
- 8.53 An additional strategic site was suggested through the public consultation, which was to include the Former Groves Cranes site as a strategic site. However this was not included as a strategic site as it was not considered to be of a scale that would warrant allocation in a strategic plan. The site is currently going through the planning application process to gain outline consent and as such it has been included within the housing supply within the SHLAA. It is the intention to allocate the site through the Allocations and Designations Plan
- 8.54 As part of the consultation process a number of additional sites were suggested for inclusion with the supply by consultees and others suggested the removal of certain sites from the supply due to delivery concerns. These alternatives are considered in the table below.

Table 23 Alternative sites for housing

SHLAA site	Suggested amendment	Consultee	SCC Response	Conclusion
254 Fulwell Reservoir	Include site in supply	Northumbrian Water (PD2714)	Site has previously been discounted due to significant highway issues which would limit the site to a maximum of 3 dwellings. Extensive biodiversity concerns, which would also require significant mitigation.	Not considered deliverable within plan period.
078 Farringdon Row	Increase units from 69 to 156	Siglion (PD2912)	Site is included within the supply, however the site constraints restrict	No further evidence has been submitted to

			the dwelling numbers increasing to 156.	demonstrate increased numbers, as such retain at 69 units.
166 Numbers Garth	Include site in supply	Siglion (PD2912)	Site is excluded from the supply as potential deliverability issues.	No further evidence has been submitted to demonstrate deliverability as such not considered deliverable in plan period.
258 Washington Football Club, Albany Park	Include site in supply with a yield of 80 dwellings.	Getton Construction (PD2616)	This site is included within the supply with expected delivery in years 6-10 for 46 units due to the site constraints.	Site is considered deliverable for 46 units.
294B – Hendon Paper Mill	Include site in supply	Paul Mackings (PD2902)/Persimmon Homes (PD3923)	Required for employment purposes.	Site not considered suitable.
Quarry House Lane (adjoining site 421)	Include larger site in supply.	Wynyard Homes (PD4695)	Site 421 has planning permission for 33 units. Larger site has been submitted via consultation process, however site is within the Settlement Break and is considered unacceptable.	Larger site not considered suitable.
426A – Willow Farm –South Ryhope	Increase build rate to 60dpa and build out within plan period.	Church Commissioners (PD5245)	The build out rates are consistent with the SHLAA, which was prepared with input from the development industry.	No further evidence submitted to demonstrate increased build out rates. Site to be retained at 30 dpa.
464B- East of Granaries, Offerton	Include site in supply	Ray Delaney/Sharon Cox/Allan Cox (PD31/32/33)	Green Belt site, see Green Belt report.	Site not considered suitable.
715 – Ryehill – Lane to south of Redburn Rd	Include site in supply	Harworth Estates (PD2094)	Site heavily constrained, proximity to Rainton Meadows Nature Reserve. Open countryside.	Site not considered suitable.
Hutton Close, Houghton	Include site in supply-self-build	Ms.Taylor & Ms.McClelland (PD4315)	No plan submitted. Assume SHLAA site 340. Site constraints – flooding, access,	Site not considered suitable.

			Settlement Break, Green Infrastructure corridor.	
Land at Glebe House Farm	Include in supply- self-build	Alan Hutchinson (PD2013)	Green belt site.	Site not considered suitable.
Emily's nursery	Include site in supply.	Michael Harney (PD4223)	Site adjoins SHLAA site 692 which is expected to come forward in the latter years of the plan period. Emily's nursery is allocated employment land and is required to be retained for such purposes.	Site not considered suitable.
426b Land to the south of South Ryhope	Include site in supply.	Church Commissioners (PD5246)	Site is within the Green Belt.	Site not considered suitable.
343 (part)	Include site in supply	O+H properties (PD4219)	Site is within the Green Belt.	Site not considered suitable.
418/ 647 (part)	Include site in supply	Exors of Mrs M R Swinburn (PD1498)	Site is within the Green Belt.	Site not considered suitable.
330A (part) Land at Philadelphia	Include site in supply	Church Commissioners (PD1790)	The land put forward by the agent forms part of the wider approved planning application for the Philadelphia scheme (14/00538/HYB) and is set out as landscape. As part of the planning application the appropriate ownership notice was served on the Church Commissioners.	Site is not considered suitable or available.
87- Dubmire school site, Fence Houses	Remove site from supply	Resident	Deliverable site, see SHLAA 2018 Appendix P, Coalfield Site Assessments, site 087	Site is considered deliverable and included within supply.
085 Groves	Remove from supply, concerns over delivery – Market issues	Barratt David Wilson (BDW) (PD5115)	Deliverable site in line with SHLAA methodology. Outline planning application pending consideration.	Site is considered deliverable and included within the supply.
110 Starks Builders Yard	Remove from supply. Concerns over delivery - viability	BDW (PD5115)	Site is being delivered by Karbon Homes and is now complete.	Site complete October 2018 and will be removed from

				supply in SHLAA update.
142 Former Chilton Moor Cricket Club	Remove from supply. No developer on board	BDW (PD5115)	Outline approval Dec 2017, applicant progressing scheme.	Site is considered deliverable and included within supply.
159 Land adjacent to scullery	Remove from supply. Viability – Public sewer	BDW (PD5115)	Council site. A developer has been identified for the site, a scheme has been drawn up and planning application submitted for 8 units- 18/00040/FU4	Site is considered deliverable and included within supply.
163 Amberley street	Remove from supply. Viability issues.	BDW (PD5115)	Being progressed and potential funding streams being investigated.	Site is considered developable and included within supply.
175 Fulwell Quarry east	Remove from supply. Site constraints	BDW (PD5115)	Site forms part of the North area Masterplan and Local Authority Accelerated Construction monies offered for the site from Homes England to address site constraints.	Longer term deliverable site, expected 11-15 due to site constraints that need to be overcome.
154B Seaburn Camp	Remove from supply. No access. Can only come forward if sites 154A and 413 come forward.	BDW (PD5115)	Site access will be via site 413, which has outline planning in place for the residential element. Site assembly has taken place and site clearance is underway. First completions are expected on site 413 in 2021/21 with a ten year built out as such site 154B is not expected to come forward until 2028/29.	Site is considered developable in years 11-15 and forms part of the supply.
312 Former Junglerama	Remove from supply. No works started yet and had permission 2016	BDW (PD5115)	Residential permission in place for 12 units, applicant investigating alternative uses. Further evidence needed to ensure deliverability for housing.	Site will be considered further via the next SHLAA update.

362 Bonnersfield	Remove from supply. Viability issues due to significant remediation.	BDW (PD5115)	Site has been cleared and progressing through the appropriate processes.	Site is considered deliverable and is included within supply.
421 Quarry house lane	Remove from supply. Struggling to get developer on board.	BDW (PD5115)	Planning application approved February 2018. Developer has confirmed start on site March 2019, with expected completion March 2021.	Site is considered deliverable and will remain in supply.
494 Land at chapel street/Edward street	Remove from supply. Viability – approved 2017.	BDW(PD5115)	Developer interest in site.	Site is considered deliverable and included within the supply.
665 255 High street west	Remove from supply. Expired application	BDW (PD5115)	Application has now expired (June 2018). New application submitted and approved for change of use to HMO.	Site will be removed from supply in next update of SHLAA.
683 20 Murton street	Remove from supply. Approved in 2016	BDW (PD5115)	Development is complete.	Site complete October 2018 will be removed from supply in SHLAA update.
684 32 Frederick st	Remove from Supply. Not viable – approved 2016	BDW (PD5115)	Development is complete.	Site is complete and will be removed from supply in SHLAA update.
698 Former Hendon gardens hotel	Remove from supply. Approved May 17- not viable	BDW (PD5115)	Development has started and completions expected end of 18/19 or 19/20.	Site is included within supply and will be updated in SHLAA update.
703 Warm up Wearside	Remove from supply. Approved June 17 –not viable	BDW (PD5115)	Agent confirmed planning permission will be implemented before it expires.	Site is considered deliverable and included within supply.
704 Fence houses Comrades Club	Remove from supply. Approved Aug 17 –not viable	BDW (PD5115)	Full planning permission August 2017.	Site is considered deliverable and included within supply.
705 2 Grange Crescent	Remove from supply. Approved Aug 17- not viable	BDW (PD5115)	Building Regulations application approved June 2018- Building work started	Site is considered deliverable and included within supply.

439 Cricklewood Road	Remove from supply. Viability	BDW(PD5115)	The site assessment indicates that the Plan wide viability assessment concludes that a site of this typology is unlikely to be viable due to associated costs of development on brownfield land. However, the assessment goes onto state that the site is a small site in an area where SME builders are delivering housing units, as such considered developable in the latter plan period.	Site is considered developable within years 11-15 of the plan period and is included within the supply.
467A Upper Fulwell	Remove from supply. Constraints/contamination	BDW	Site forms part of the North area Masterplan and Local Authority Accelerated Construction monies offered for the site from Homes England to address site constraints.	Site is considered developable years 10/11 of the plan period and is included within supply.
467B Thornbeck College site	Remove from supply. Archaeological issues	BDW	Site forms part of the North area Masterplan and is to be brought forward in conjunction with other sites in the area.	Site is considered developable in years 6-10 of the plan period and included within supply.
538 Havannah Rd	Remove from supply Private landowner no evidence willing to sell. Part council owned.	BDW	Council progressing scheme with private landowner. Initial scheme has been drawn up.	Site is considered developable in years 6-10 and included within supply.
701 67 John St.	Remove from supply. Expired	BDW	Permission given in November 2017, expires 2020.	Site is considered deliverable and included within the 1-5 supply.

8.55 The SHLAA is undertaken at a point in time and as such the status of sites will change during the Plan preparation, this is recognised and reflected through the flexibility factor.

Effective

Deliverable

- 8.56 The policy will be delivered by statutory delivery agencies, developers and land owners and Council assets, through the submission of planning applications for housing developments, which in turn will be determined by the Local Planning Authority. Other Council strategies and Local Plan documents will also assist in housing delivery, with site specific housing allocations to be made within the emerging Allocations and Designations Plan to ensure that there is a sufficient supply of allocated sites to deliver the policy.
- 8.57 The Council as land owner will also assist in delivering this policy by marketing sites for housing developments and preparing masterplans to ensure areas are comprehensively planned, along with design guides to promote housing sites. Sunderland Homes, which is an arms-length housing company established by the Council will also assist in the delivery of new homes.
- 8.58 The background text to the policy sets out the measures to be taken should housing delivery not keep pace with the requirement. Barratt David Wilson Homes suggest providing clarity on what is meant by 'sustained under-performance against the requirement' within paragraph 6.9 of Policy SP8. The measures which will be put in place will be dependent upon the degree of under-performance when looking at the performance accumulatively. The definition of 'sustained under-performance' has been included within the Council's monitoring report (SD13)³⁰³. Reference is made within the Safeguarded land Policy SS3 to the safeguarded land providing flexibility and allows for a plan review if the council cannot demonstrate a five-year land supply, as such it is considered appropriate to reflect this within the background text to policy SP8.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP8	Housing supply and delivery	Sets out the number of new homes to be developed and how it will be achieved	<ul style="list-style-type: none"> 5% under delivery on the target in the policy Sustained underperformance³⁰⁴ on the five year land supply Failing the Housing Delivery Test 	<ul style="list-style-type: none"> 5% under delivery on the target in the policy, the Council will prepare and publish an action plan, setting out the key reasons and the actions to bring the building back on track. 15% under the authority will apply a 20% 	<ul style="list-style-type: none"> Housing completions against the overall plan period target for 13,410 net additional homes to 2033 Housing delivery (net additions) against the plan period requirements of average 745pa net additions Windfall delivery of new 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHLAA SHMA

³⁰³ https://www.sunderland.gov.uk/media/20962/SD-13-Core-Strategy-and-Development-Plan-Monitoring-Framework-2018-/pdf/SD.13_Implementation_and_Monitoring_Framework_CJ_FINAL_DRAFT_13_12_18.pdf?m=636803814155470000

³⁰⁴ Sustained underperformance is defined as failing to meet the Council's annual housing target for at least 3 consecutive years (unless the Council is currently ahead of its cumulative requirement at that point in time).

				buffer to its 5 year housing land supply <ul style="list-style-type: none"> • Potential review of the Plan/Policy 	homes on unallocated sites and small sites <ul style="list-style-type: none"> • Housing conversions – gross and net additions and losses • Housing trajectory • Housing land availability: <ul style="list-style-type: none"> ○ 5-year supply of deliverable sites ○ 15-year supply of deliverable and developable sites (incl. broad areas) 	
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Consistent with National Policy

8.59 The policy reflects the guidance set out in chapter 6 of the NPPF and sets out a number of ways the identified housing need of the city will be met.

H1 Housing Mix

8.60 This policy is in place to ensure that residential development creates mixed and sustainable communities, by meeting the housing needs of the city’s existing and future population.

H1 Housing Mix

1. Residential development should create mixed and sustainable communities by:
 - i. contributing to meeting affordable housing needs (Policy H2), market housing demand and specialist housing needs as identified through the council’s SHMA or other evidence;
 - ii. providing a mix of house types, tenures and sizes which is appropriate to its location;
 - iii. achieving an appropriate density for its location which takes into account the character of the area; and
 - iv. requiring 10% of dwellings on developments of 10 or more to meet building regulations M4 (2) Category 2 – accessible and adaptable dwellings.
2. Development where appropriate and justified, should also seek to:
 - i. provide larger detached dwellings; and
 - ii. ensure there is a choice of suitable accommodation for older people and those with special housing needs including bungalows and Extra Care housing
3. Development should consider the inclusion of self-build and custom house building plots.

Positively Prepared

Vision and Strategic Priorities

8.61 This policy will deliver the spatial vision and strategic priorities by helping to increase population levels and increase the mix of good quality housing, whilst offering residents the opportunity to live in sustainable communities.

8.62 Policy H1 will help to deliver Strategic Priorities 1, 2, 3 and 4

Draft Plan Comments

8.63 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:

- No need for affordable homes
- Concerns over the quality of social stock
- Concern that enough homes have been built.
- Developers raised viability concerns if they are expected to deliver affordable homes, accessible homes and build to lifetime homes and national standards.
- Developers concerned over the requirement for building self-build and custom build homes in regards to size and location.
- Developers request specific policy reference to increasing the supply of executive homes. Some developers supported the requirement to increase the amount of larger family homes
- Persimmon objects to the reference to Lifetime Homes in the policy. Siglion requested the reference is moved to supporting text. They also oppose the requirement for accessibility homes on the grounds that there is no evidence to justify this approach.
- The Planning Bureau requested that the policy is re-written to be more supportive of older persons accommodation including specialist/purpose built.

How Issues Have Been Taken into Account at Publication Draft

8.64 The Publication Draft and Policy H1 have been updated to address the issues raised:

- Policy H1 Housing Mix has been revised to set out more clearly what is 'required' of residential developments in relation to housing mix and what the Council 'seeks developments to provide' where appropriate and justified. Accommodation provision for older people is included within where appropriate and justified.
- Policy H1 Housing Mix has now been revised and sets out more clearly the requirements in relation to self-build and custom house building, stating that, 'developments should consider the inclusion of self-build and custom house building plots'.
- The reference to Lifetimes homes has been removed altogether from the policy. This aspect is now covered by the policy requiring 10% of dwellings on developments of 10 dwellings or more to meet Building Regulations (M4)2 Category 2- accessible and adaptable dwellings. The evidence supporting this requirement is set out within the supporting reports, which demonstrate need and viability.
- The Viability Assessment (SD60³⁰⁵) has been updated to demonstrate that all policy requirements have been taken into consideration and that sites would be viable.
- As the Council does not own any social housing it has limited powers to improve existing stock. Gentoo are currently undertaking a programme to ensure all of its stock achieve the Decent Homes Standard. The Plan encourages through policy that affordable homes are of the same quality and design as market homes. Policy H5 has been amended however to indicate that the Council will support development which brings empty properties back into use.
- The Policy does not refer to a requirement for Executive Homes but the Policy has been updated to require a mix of homes and to meet the needs identified in the most current SHMA. Policy H1 requires where appropriate and justified developments should seek to provide larger detached dwellings.

Publication Draft Comments

8.65 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

³⁰⁵ [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017\).pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017).pdf?m=636803111173630000)

- Barratt David Wilson Homes (PD5413) supports the principle of providing a broad mix of housing, however the Plan should not dictate the housing mix and the Policy should be flexible. Siglion (PD3042) supports the principle of delivering a diverse housing mix.
- Persimmon Homes (PD4004) state that point H1 (1iii) should seek to optimise density and promote an uplift in town and city centres and locations well served by public transport.
- Karbon Homes (PD3386) generally supports Policy H1, however they suggested an amendment to point iv) to allow for schemes not to deliver this requirement if it would make a scheme unviable
- Burdon Lane Consortium (PD2454), Esh Developments (PD1912), Hellens Land Ltd (PD5039), Taylor Wimpey (PD3697), Barratt David Wilson (PD5413/PD1616), Persimmon Homes (PD4004), Story Homes (PD861), Bellway Homes (PD1937), Siglion (PD3042) and the Home Builders Federation (PD4685) all raised concerns to Policy H1 on the grounds that the 10% requirement for homes to meet building regulations M2(2) Category is not effective, would be onerous, has not been evidenced, is not consistent with the requirements set out in the PPG or the Written Ministerial Statement and would impact on viability. Barratt David Wilson states that the standard should encourage not require (PD5413).
- Friends of Sunderland Green Belt (PD3017) raised concerns 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
- Karbon Homes (PD3386) strongly support point 2 and suggested more detail to be included within the policy regarding accommodation for older persons.
- Bellway Homes (PD1937) suggest that the onus should be on the Council to demonstrate that need for older persons accommodation and self-build housing exists, rather than on the developer to evidence that it doesn't. Persimmon Homes (PD4004) also have concerns over the requirement for older person's accommodation as this is not justified, evidence based and the viability implications have not been tested.
- Wynyard Homes (PD4698) supports the 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. Wynyard Homes also supported 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.
- Landowner, Mr. Hutchinson (PD2050) offered strong support for reference to self-build and custom house developments. Land at Glebe House Farm was promoted for self-build or custom build.
- Developer Mr. Delaney (PD33) stated 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.
- Two residents (PD972 + PD806) stated that more needs to be done to bring empty properties back into use before developing beyond the centre of the city, and the policy does not meet the needs of those wanting to self-build. A self-build site at Hutton Close, Houghton-le-Spring was promoted for self-build (PD4315).

How Issues Have Been Taken into account prior to Submission

8.66 In response to the representations raised by Barratt David Wilson Homes (PD5413) the Council does not feel it necessary to make any modifications as 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. In response to the representations raised by Persimmon Homes (PD4004) the Council does not feel it necessary to make any modifications as 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. In response to representations raised by Karbon Homes (PD3386) the Council has proposed an additional modification as set out in the schedule of modifications (M36).

- 8.67 In response to the representations raised by the majority of house builders in relation to accessible and adaptable dwellings, the Council does not feel it necessary to make any modifications as it is considered that the evidence as set out within the SHMA (SD 24³⁰⁶) justifies the reasoning behind the policy requirements for accessible and adaptable homes. The Whole Plan Viability Assessment, August 2017 (SD60³⁰⁷) considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note 2018 (SD61³⁰⁸) confirms that setting the level at 10% should not have an adverse impact on the viability and deliverability of individual sites and the plan.
- 8.68 In response to the representations raised by the Friends of Sunderland Green Belt (PD3017), the Council does not feel it necessary to make any modifications as the need for these types of properties is evidenced through the SHMA (2017 (SD23³⁰⁹)), in order to rebalance the housing stock within the city more closely with need and aspirations of Sunderland residents. In response to the representations raised by Karbon Homes (PD3386) in relation to older persons, the Council does not feel it necessary to make any modifications as 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 peoples accommodation. This level of detail is considered appropriate.
- 8.69 The policy is worded as such that it is not a requirement of all housing schemes to provide accommodation for older people. The intention of this aspect of the policy is such that the Council through their evidence base identify where there is a particular need for developers to consider within housing schemes. In response to the representation raised by Bellway Homes (PD1937) and Persimmon Homes (PD4004) the Council has proposed an additional modification as set out on in the schedule of modifications (M37).
- 8.70 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. In response to the representation raised by Wynyard Homes (PD4698) and Mr. Delaney (PD33) the Council has proposed an additional modification as set out on the Schedule of Modifications (M38).
- 8.71 In response to the representations raised by Mr. Hutchinson the Council does not feel it necessary to make any modifications as the Land at Glebe House Farm is to be retained as Green Belt.

³⁰⁶ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-/pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

³⁰⁷ [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017_.pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017_.pdf?m=636803111173630000)

³⁰⁸ [https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_\(2018\).pdf?m=636803112052470000](https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_(2018).pdf?m=636803112052470000)

³⁰⁹ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

- 8.72 In response to the representations raised by Mr. Delaney and executive homes, the Council does not feel it necessary to make any modifications as 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. In response to the representations raised by residents, the Council does not feel it necessary to make any modifications as Policy H5 of the Plan seeks to manage the existing housing stock by bringing empty properties back into use and supporting programmes of improvement, renewal and replacement.
- 8.73 In response to the representations raised by the resident promoting the Hutton Close site the Council does not feel it necessary to make any modifications as the Council does not support the site suggested at Hutton Close for development due to the fundamental impact on the Settlement Break and also due to significant constraints that affect site suitability and achievability.

Proposed Modifications to the Publication Draft

8.74 The Council proposes the following modifications;

Policy/ Para/ Figure	Proposed Change	Justification
6.12	(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>	To address representations submitted by Karbon Homes (PD3386).
6.12	It is proposed to begin a new paragraph after the above addition, which would be as follows: <u>6.13 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.</u>	To address representations submitted by Bellway Homes (PD1937) and Persimmon Homes (PD4004).
6.13	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.	To address representations submitted by Ray Delaney and Wynyard Homes (PD33 and PPD4698).

Duty to Cooperate (SD11)

8.75 No Duty to Cooperate issues have been raised regarding this policy.

Sustainability Appraisal (2017)

8.76 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.77 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.78 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	~	~	++	++	++	~	~	~	+	~	+	++

8.79 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.80 The housing mix policy is in place to ensure that residential development creates mixed and sustainable communities, by meeting the housing needs of the city's existing and future population.

Affordable Housing

8.81 The SHMA (2017) (SD23³¹⁰), considers in detail the need and scale of affordable housing requirements, which concludes that the city has a net imbalance of 542 affordable dwellings per annum over the period from 2016/17 to 2020/21. This is set out within section 7 (pg 110-113) and within Table 7. 7 (pg 111) of the SHMA (2017) (SD23). This imbalance is broken down by general needs housing and older persons housing by size, sub-area and ward to ensure housing proposals take on board affordable needs.

Market Housing

8.82 In relation to market housing demand and also developments providing a mix of house types, tenures and sizes, the SHMA Update recommends that future developments should focus on delivering house types and tenures to address identified mismatches and reflect household aspirations. With Tables 7.1- 7.5 (pg106- 109) indicating the property types that areas of the city lack.

Table 24 Comparison between current dwelling stock and market aspirations / expectations at sub-area level

Open market dwelling stock and preferences			
Dwelling type/size	Dwelling stock, likes and expectations		
	Current Private Stock %	Like %	Expect %
Detached house/cottage 1-2 Beds	0.7	5.4	1.5

³¹⁰ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

Detached house/cottage 3 Beds	4.5	13.7	5.5
Detached house/cottage 4 or more Beds	9.7	19.7	8.4
Semi-detached house/cottage 1-2 Beds	9.3	2.8	8.4
Semi-detached house/cottage with 3 Beds	23.7	17.2	22.9
Semi-detached house/cottage 4 or more Beds	5.7	3.7	4.9
Terraced house/cottage 1-2 Beds	7.9	3.6	8.9
Terraced house/cottage 3 Beds	13.9	4.8	5.0
Terraced house/cottage 4+ Beds	2.9	1.0	1.7
Sunderland Cottage 1-2 Beds	4.6	0.3	1.9
Sunderland Cottage 3+ Beds	1.1	0.8	0.0
Bungalow 1-2 Beds	5.0	14.4	13.8
Bungalow 3 Beds	2.4	6.8	3.8
Bungalow 4+ Beds	2.1	1.1	2.5
Flat/Apartment 1 Bed	5.2	4.4	10.7
Flat/Apartment 2 Beds	0.7	0.0	0.2
Flat/Apartment 3+ Beds	0.3	0.3	0.0
Other 1-2 Bed	0.2	0.0	0.0
Other 3+ Bed	0.2	0.0	0.0
Total	100.0	100.0	100.0
Base	87812	11615	10899

Comparison between current dwelling stock and market aspirations / expectations at sub-area level

Dwelling stock relative to aspirations

Dwelling type	Sub-area							
	Coalfield Communities	Inner Urban Area	Northern Coastal	Northern Suburbs	Southern Suburbs	Washington	Sunderland	
Detached house/cottage 1-3 Beds	● -11.5	● -16.8	● -17.8	● -15.3	● -13.1	● -12.9	● -13.9	
Detached house/cottage 4 or more Beds	● -4.6	● -18.6	● -17.1	● -16.4	● -10.5	● -1.6	● -10.0	
Semi-detached house/cottage 1-2 Beds	● 5.0	● 2.4	● 5.0	● 16.4	● 9.5	● 1.4	● 6.5	
Semi-detached house/cottage with 3 Beds	● 3.7	● -2.5	● 14.8	● 10.6	● 10.2	● 2.6	● 6.5	
Semi-detached house/cottage 4 or more Beds	● -0.8	● -0.5	● 8.5	● 3.7	● 2.6	● 0.8	● 2.0	
Terraced house/cottage 1-2 Beds	● 11.5	● 7.6	● 0.9	● 3.5	● 2.1	● 1.0	● 4.2	
Terraced house/cottage 3+ Beds	● 14.0	● 12.0	● 7.1	● 12.6	● 4.9	● 18.8	● 11.1	
Sunderland Cottage	N/A	● 19.6	● 12.8	● 5.2	● 2.7	N/A	● 4.7	
Bungalow	● -14.1	● -8.9	● -17.1	● -19.2	● -11.5	● -11.3	● -12.9	
Flat	● -2.8	● 4.7	● 2.8	● -1.6	● 2.8	● 2.2	● 1.5	
Other	● 0.3	● 1.0	● 0.0	● 0.4	● 0.4	● 0.0	● 0.3	

● Insufficient dwellings available relative to aspiration
● Sufficient dwellings available relative to aspiration

Dwelling stock relative to expectations

Dwelling type	Sub-area							
	Coalfield Communities	Inner Urban Area	Northern Coastal	Northern Suburbs	Southern Suburbs	Washington	Sunderland	
Detached house/cottage 1-3 Beds	● 0.7	● -4.7	● -5.6	● -3.1	● -1.0	● -0.7	● -1.8	
Detached house/cottage 4 or more Beds	● 6.7	● -7.3	● -5.8	● -5.1	● 0.8	● 9.7	● 1.3	
Semi-detached house/cottage 1-2 Beds	● -0.6	● -3.2	● -0.6	● 10.8	● 3.8	● -4.3	● 0.8	
Semi-detached house/cottage with 3 Beds	● -2.0	● -8.2	● 9.1	● 4.9	● 4.5	● -3.1	● 0.8	
Semi-detached house/cottage 4 or more Beds	● -2.0	● -1.7	● 7.3	● 2.5	● 1.4	● -0.4	● 0.8	
Terraced house/cottage 1-2 Beds	● 6.2	● 2.4	● -4.3	● -1.7	● -3.1	● -4.2	● -1.0	
Terraced house/cottage 3+ Beds	● 13.1	● 11.1	● 6.2	● 11.7	● 4.0	● 17.9	● 10.2	
Sunderland Cottage	N/A	● 18.8	● 12.0	● 4.3	● 1.8	N/A	● 3.9	
Bungalow	● -11.8	● -6.6	● -14.9	● -16.9	● -9.2	● -9.0	● -10.6	
Flat	● -9.0	● -1.5	● -3.4	● -7.8	● -3.4	● -3.9	● -4.7	
Other	● 0.3	● 1.0	● 0.0	● 0.4	● 0.4	● 0.0	● 0.3	

● Insufficient dwellings available relative to expectation
● Sufficient dwellings available relative to expectation

- 8.83 In particular, the SHMA Update (SD23) identifies a shortfall of larger detached family homes and bungalows. The policy therefore seeks to ensure that these shortfalls can be met through residential planning applications where appropriate and where justified. When considering the housing mix for a residential scheme, the location of the site also has to be considered to ensure what is being provided in terms of types, tenure and size, is appropriate to the location.
- 8.84 The Council does not consider the policy to be onerous and prescriptive, in regard to housing mix, size and type. 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.

Density

- 8.85 In line with the NPPF (para 47, Pg13) the approach to density within the policy seeks to achieve a density which is appropriate to the location and character of the area, rather than setting actual density figures. Through this policy higher densities will be encouraged in locations which have good public transport access and are located in close proximity to centres.
- 8.86 With regards the housing supply and the density levels as set out in the SHLAA 2018 (SD23), para 4.23-4.25, where information was available from sources such as planning applications, development briefs and masterplans these yields have been utilised, otherwise a baseline of 30 dwellings per hectare was assumed as a starting point and then other known factors were taken into consideration, such as site constraints, viability and development type.
- 8.87 Sites within the housing supply as set out in the SHLAA range from single figures up to 960 dpha. Over half of the sites that make up the supply within the SHLAA fall within a density range of between 30-60 dpha. The majority of the sites which have very high density levels are located within the City Centre, reflecting their sustainable location. In order to ensure the best use of sites, consideration was given to where possible, increasing densities. However, due to the types of housing needed in the city and the viability of higher density developments, this had little impact on the overall supply.
- 8.88 The Plan is to be submitted through the transitional arrangements and as such the policies are in compliance with the National Planning Policy Framework 2012 and do not reflect the prescriptions of the National Planning Policy Framework 2018.

Accessible and adaptable dwellings

- 8.89 The SHMA Addendum (2018) (SD24) sets out the number of adapted properties M4 (2) that are required over the plan period, Table 1.4, Para.3.9, based upon the household survey that was undertaken as part of the 2016 SHMA (SP57), which is 2,143 properties. The Addendum concludes (Para 3.12) that to positively plan for the future need for adapted dwellings, it is recommended that the council seek 10% of new development to meet optional accessibility standards, subject to viability. This allows for a proportion of the required adapted properties to be met via new build and a proportion through adaption of existing stock (for those wanting to remain in their own homes). The policy is consistent with these recommendations.
- 8.90 Furthermore, the Council has prepared a technical paper (Technical Paper: Optional Standards – Accessible and Adaptable Dwellings' (2018)), (SP16), which supplements the SHMA (2016) (SP57) and the associated SHMA Addendum (2018) (SD24) as well as the

Sunderland Viability Assessment (2017) (SD60) and the Sunderland Viability Note (2018) (SD61). In alignment with these documents, the technical paper concludes that the Council has demonstrated the need for applying the optional standard (M4(2) due to; Sunderlands significant existing and projected growth in older aged cohorts , the significant high level of disability within Sunderland, with the city having the fifth highest rate of disability in England, (based on activities that limit activity a lot) as well as the low level of adaptations to the existing housing stock.

- 8.91 It is considered that the evidence as set out within the SHMA Addendum 2018 (SD24) and Technical paper (SP16) justifies the reasoning behind the policy. The Whole Plan Viability Assessment, August 2017 (SD60) (see table 8.2, pg 95) considered the costings associated with building to Category 1, 2 and 3, and built them into the site appraisals. The Sunderland Viability Note ((2018) (SD61) see paras 2.22-2.23 (pg7)), confirms that setting the level at 10% for Building Regulations M4 (2) Category 2 should not have an adverse impact on the viability and deliverability of individual sites and the plan.

Larger detached dwellings

- 8.92 The policy also seeks, where appropriate and justified, that developments should provide larger detached dwellings (dwellings with 4 beds or more). The need for these types of properties is evidenced through the SHMA (2017) (SD23), in order to rebalance the housing stock within the city more closely with need and aspirations of Sunderland residents (see Para 8.25 (pg129) and Tables 7.4-7.5, (pg 108-109). Reference is made to developments contributing to meeting the needs as identified through the SHMA or other evidence within criteria 1 of the policy. This helps future proof the plan if needs change and as such the provision of larger detached dwellings does not need to be referenced separately in this part of the policy.

Older persons housing

- 8.93 Housing plays a fundamental role in ensuring the health and well-being of its residents, particularly older persons and vulnerable groups. Over the past few years the Council has been very progressive in providing accommodation with care options for older people through Extra Care housing programme, nearly 900 units have been developed with partners. In addition, there are over 1,200 units of sheltered housing in the city. (Housing Strategy for Sunderland 2017, Pg 32) (SP13³¹¹). The number of older persons aged 65+ years in Sunderland is projected to increase by 42% from 2015 to 2039, (Housing Strategy for Sunderland 2017) (SP13). As such, it is important to ensure more choices are available to support the increasing group of older persons with a variety of housing needs.
- 8.94 The SHMA Update (2017) (SD23) at para 7.47 and table 7.16, pg 120 suggests a need to continue to diversify the range of older persons' housing provision, as such the policy includes this point. It is considered that 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.

Self-build and Custom Build

- 8.95 To enable more people to build or commission their own home, the Council have a register in place which gives an indication of the demand for this type of build within the city and allows the council to identify sites which may be suitable for developments of this type. The

³¹¹ [https://www.sunderland.gov.uk/media/20916/SP-13-Housing-Strategy-for-Sunderland-2017-2022-2017-/pdf/SP.13_Housing_Strategy_for_Sunderland_2017-2022_\(2017\).pdf?m=636803123165700000](https://www.sunderland.gov.uk/media/20916/SP-13-Housing-Strategy-for-Sunderland-2017-2022-2017-/pdf/SP.13_Housing_Strategy_for_Sunderland_2017-2022_(2017).pdf?m=636803123165700000)

SHMA 2017 (SD23) at para 7.40-7.42 (pg 118-119), indicates limited interest in self-build and custom house building plots, as such the policy does not specify this as a requirement, but states that development should consider the inclusion of self-build and custom house building plots.

- 8.96 A representation was received with regards criterion 3 and the use of the word 'inclusion', suggesting that parts of larger sites should also be used for self-build and not bespoke self-build sites. 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. Suggested additional text to paragraph 6.13, pg 59 to include reference to supporting all self-build developments. (M38).
- 8.97 Policy SP8 sets out the intentions for delivery and as self-builds could be included within any of the delivery mechanisms it is not considered that they explicitly need to be referenced with the policy. This intention of part 2 of this policy is such that the Council through their evidence base, be that the SHMA, Housing Strategy or specialist housing studies may identify where there is a particular housing need which developers should consider within housing schemes/proposals. The viability implications of that particular development will then be taken into account.

Reasonable Alternatives

- 8.98 Alternative options for this policy would be to either increase or decrease the percentage of dwellings required to be accessible and adaptable, or not have a requirement at all. However, to increase the percentage may cause viability issues and result in the policy not being deliverable. To decrease or remove the percentage all together would result in new homes being built, which would not be meeting the needs of the city's ageing population.

Effective

Deliverable

- 8.99 The policy will be delivered through the submission of planning applications by housing developers, the Council and Housing Associations and their determination by the Local Planning Authority. Through negotiations with applicants on planning applications, the Council will seek to ensure that the housing mix on new sites is consistent with the requirements of the area, as evidenced by the latest SHMA.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H1	Housing mix	To ensure mixed and balanced communities	<ul style="list-style-type: none"> Not delivering the housing mix set out in the current SHMA. Failure to achieve 10% of dwellings meeting Building Regulations M4 (2) 	<ul style="list-style-type: none"> Review evidence base in relation to housing mix Negotiation with developers to ensure delivery of appropriate housing mix. Identify projects/interventions to address issues. Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Size (by number bedrooms), type (detached, semi-detached, terraced, bungalows, extra care housing, flats/apartments) and tenure (home ownership/private rented, social rented, shared ownership) of 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHMA

			<p>Category 2</p> <ul style="list-style-type: none"> No or little provision of larger (4+ bedroom) detached dwellings, housing for older people and special needs housing Not delivering any self-build or custom house building plots where there is evidence of demand 		<p>new housing completions</p> <ul style="list-style-type: none"> Number of custom and self-build plots approved Densities of new housing developments completed within each spatial area (average dwellings/ha) Percentage of new build dwellings which meet building regulations MH4 (2) accessible and adaptable standard 	
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Consistent with National Policy

8.100 The policy sets out how a wide choice of high quality homes will be delivered and reflects the criteria set out in paragraph 50 of the NPPF.

H2 Affordable Homes

8.101 This policy sets out to ensure that the affordable housing needs of the city can be delivered and mixed and balanced communities are created.

H2 Affordable Homes

All developments of more than 10 dwellings, or on sites of 0.5ha or more, should provide at least 15% affordable housing. This affordable housing should:

1. be provided on-site in order to help achieve mixed and balanced communities. However, off site provision or a financial contribution made in lieu may be considered acceptable where it can be justified;
2. be retained in affordable use in perpetuity;
3. when part of a mixed housing scheme should be grouped in small clusters throughout the site; and
4. be indistinguishable in terms of appearance from the market housing.

Positively Prepared

Vision and Strategic Priorities

8.102 This policy will deliver the spatial vision and strategic priorities by helping to increase the mix of good quality housing, whilst offering residents the opportunity to live in sustainable communities.

8.103 Policy H2 will help to deliver Strategic Priorities 1, 2 and 4

Draft Plan Comments

8.104 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- More affordable homes needed at Pennywell
- Developers were concerned about the reference to pepper-potting affordable homes throughout a site.

- Developers raised viability concerns if they are expected to deliver affordable homes, accessible homes and build to lifetime homes and national standards.
- Developers suggest lowering the affordable housing target to ensure that Sunderland can deliver homes. Barratt David Wilson Homes considers the Viability Assessment values to be too low and suggest a more flexibility approach to affordable homes. Gentoo requested a more flexible approach to delivering affordable homes and recommended that the requirement is not just Section 106.

How Issues Have Been Taken into Account at Publication Draft

Policy H2 has been updated to address the issues raised including;

- The Council has considered developer's concerns regarding the policy requirement of pepper potting in the Draft Plan. The Plan has been amended to state clusters. The Council does not want an over concentration of affordable homes on sites. The Council has amended the policy to ensure that affordable homes are of a similar design and style as market homes.

Publication Draft Comments

8.105 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Esh Developments (PD1922), Hellens (PD5047) and Taylor Wimpey (PD3722) supported the policy (and supporting 6.23 text on viability).
- Wynyard Homes (PD4701) support policy H2 in principle, but consider that the text from Paragraph 6.23 should be incorporated into the Policy.
- Karbon Homes (PD3387) generally support policy H2, but suggested the definition to accord with the revised NPPF to allow more flexibility. They also suggested that point 2 of the policy is limiting to certain tenures including rent to buy and this point should be deleted from Policy H2.
- Bellway Homes (PD1946), Home Builders Federation (PD4738), Siglion (PD3026), Story Homes (PD982) and Persimmon Homes (PD4045) raise concerns to policy H2 on the grounds that the affordable housing requirement is too high and should be reduced, it is too restrictive and will affect site viability and the fact that the viability assessment identifies brownfield sites as unviable.
- Persimmon Homes (PD4045) are concerned that cumulative impacts of other policy requirements in the Plan will affect viability. Persimmon suggests that a large proportion of urban sites would not be viable with a 15% affordable housing requirement and disagree with the residual values used in the whole plan viability assessment.
- Friends of Sunderland Green Belt (PD3018) state that the 15% requirement is too low, and suggest that affordability is not a problem in Sunderland.
- Barratt David Wilson Homes (PD5439) supports the need for affordable housing and the 15% requirement, but feels that the tenure split should be 70% affordable rent and 30% intermediate tenure. They are concerned that policy requirement may impact site viability and the need to undertake site specific viability assessments on a regular basis. Hellens (PD5047) advises that seeking a tenure split is too prescriptive and Persimmon (PD4045) suggest a need for flexibility on tenure split when viability is an issue.
- Esh Developments (PD1922), Hellens (PD5047), Taylor Wimpey (PD3722), Siglion (PD3026), Burdon Lane Consortium (PD2506) and Story Homes (PD982) recommended an alteration to paragraph 6.21 that clustering should not be prescriptive in terms of the size of each cluster and should be proportionate to the scale of the overall development. The wording should be amended to better reflect the RPs requirements that the housing they manage should be closely related for operational purposes.
- Burdon Lane Consortium (PD2506) should make clear the different affordable housing requirements are in place for SSGA and some aspects of the policy are too precise and restrictive.

- Story Homes (PD982) challenge sub-point 4 as restrictive and suggest proposed policy and paragraph wording.
- Northumbrian Water (PD2700) supports para 6.23 of the policies supporting text.
- Persimmon Homes (PD4045) state that to ensure the policy 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.

How Issues Have Been Taken into account prior to Submission

- 8.106 In response to the representations raised by Wynyard Homes (PD4701), the Council does not feel it necessary to make any modifications as 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.
- 8.107 In response to the representations raised by Karbon Homes (PD3387), the Council does not feel it necessary to make any modifications as the plan is being submitted under transitional arrangements 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.
- 8.108 In response to the representations raised by Bellway Homes, HBF, Siglion, Story Homes and Persimmon Homes and Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance. SCCs Whole Plan Viability Assessment (SD60) indicates that the selected percentage level is the maximum achievable whilst ensuring greenfield sites remain viable. 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.
- 8.109 In response to the representations raised by Barratt David Wilson Homes, Hellens and Persimmon the Council does not feel it necessary to make any modifications as it is not considered that the affordable housing needs of the city's existing and future residents will be met by specifying a 70/ 30 tenure split. Evidence through the 2017 SHMA (SD23) indicates an overall preference for 79.4% social/affordable rent. In addition to this, the viability work suggested that an 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.
- 8.110 In response to the representation raised by Esh Developments (PD1922), Hellens (PD5047), Taylor Wimpey (PD3722), and Siglion (PD3026), Burdon Lane Consortium (PD2506) and Story Homes (PD982) it is agreed that the size of the cluster should be proportionate to the scale of the overall development and the Council has proposed an additional modification as set out in the Schedule of Modifications (M40).
- 8.111 In response to the representations raised by Burdon Lane Consortium (PD2506) in relation to SSGA the Council has proposed an additional modification as set out in the Schedule of Modifications (M39).
- 8.112 In response to the representations raised by Story Homes and sub-point 4, the Council does not feel it necessary to make any modifications as ensuring the affordable properties are

indistinguishable from market housing allows for better integration and avoids the affordable housing being immediately identified. In response to the representations raised by Persimmon Homes, the Council does not feel it necessary to make any modifications as 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.

Proposed Modifications to the Publication Draft

8.113 The Council proposes the following modifications;

Policy/ Para/ Figure	Proposed Change	Justification
6.16	Policy H2 sets out the council's approach for the delivery of affordable housing when developments propose more than 10 dwellings. <u>Refer to Policy SS6 for affordable housing requirements within the South Sunderland Growth Area (SSGA).</u>	To address representations submitted by Burdon Lane Consortium (PD2506).
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 <u>of a size proportionate to the scale of the development (3 or 4 dwellings per cluster).</u>	To address representations submitted by Story Homes (PD982), Esh Developments (PD1922), Burdon Lane Consortium (PD2506), Siglion (PD3026), Taylor-Wimpey (PD3722), and Hellens (PD5047).

Duty to Cooperate (SD11)

8.114 No duties to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)

8.115 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.116 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.117 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	~	+	~	~		~	~	~	~	~	~	~

8.118 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.119 The SHMA (2017) (SD23), considers in detail the need and scale of affordable housing requirements, which concludes that the city has an overall net imbalance of 542 affordable

units each year over the period from 2016/17 to 2020/21. This is set out within section 7 (pg 100-113) and within Table 7. 7 (pg 111) of the SHMA report (SD23).

- 8.120 The requirement for 15% affordable housing originally stems from an Economic Viability Assessment undertaken in 2014 (Economic viability of affordable housing requirements, March 2014, para.7.19, pg40/41) (SP14) which informed a previous draft of the plan. Since then, this 15% has been subject to more updated viability testing through the Whole Plan Viability Assessment (2017) (SD60). The whole plan viability assessment undertook a range of sensitivity tests which included adjusting the level of affordable housing from 0% up to 30% (Tables 10.4a-e, pg 132-136) and assumed a tenure split of 75% affordable rent and 25% intermediate tenure.
- 8.121 The viability assessment (SD60) indicated 15% affordable housing could be viably achieved on all greenfield site typologies (All brownfield sites not viable), but that once affordable housing levels started increasing to 20%, greenfield sites in certain areas were not viable. The Council therefore concludes that 15% remains the most appropriate affordable housing requirement.
- 8.122 Notwithstanding the tenure split assumed through the viability work, in line with the SHMA (SD23), the policy seeks to achieve an affordable housing split of 80% affordable rent and 20% intermediate tenure, para 7.14, pg 112. This split reflects household preferences of both existing households and those newly-forming households. In terms of viability, it is considered that this change in tenure split is likely to have a small negative impact on viability, as set out within the Sunderland City Council Post Consultation/Pre-submission Viability Note June 2018, Para 2.29, pg 8 (SD61).
- 8.123 Whilst it is recognised that the viability assessment concludes that no affordable housing would be viable on all brownfield site typologies, in reality affordable housing has been and is continuing to be delivered on brownfield sites within the city. Between 2010 and 2016, of the sites that have delivered affordable housing through S106 agreements, 26% has been on brownfield sites, 38% on greenfield and 37% on mixed sites (SCC S106 register records 2018).
- 8.124 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 to still enable the 15% to be provided, subject to a detailed Economic Viability Assessment, as set out with the Draft Planning Obligations SPD, pg 10 (SD63).
- 8.125 Whilst it is recognised that the policy requirement would not ensure a sufficient supply of affordable housing to address the affordable housing imbalance, it is the maximum level that can viably be achieved. In addition to this, the Council actively engage with developers and registered providers to assist and facilitate in bringing forward additional schemes which contribute to the city's affordable housing imbalance, including utilising council land and investigating and promoting the use of grant funding opportunities. Sunderland Homes are also in place as an arm's length organisation who assist in delivering the types and tenures of properties that the open market do not always deliver on.
- 8.126 It is also recognised that a significant reason why the affordable housing imbalance is so high is because it seeks to address the backlog in full within the next five years. If this was spread over a longer time period, this would significantly reduce the imbalance.

- 8.127 The policy aim is that affordable housing should be provided on site to ensure sustainable, inclusive and mixed communities, however the policy recognises that providing affordable units on site is not always appropriate, as such the wording of the policy allows for off-site provision or a financial contribution in-lieu if the circumstances exist and can be robustly justified. Circumstances include, but are not limited to, broadening the mix of neighborhoods of predominately social rented tenures, identified need for specific affordable dwellings that cannot be accommodated within the development site or the site is being developed for low density housing.
- 8.128 To ensure the affordable housing units offer choice in tenure for existing and future residents, affordable housing is required to be retained as affordable in perpetuity. This could include recycling subsidy for alternative affordable provision or retention of discounts for future households. As such appropriate mechanisms will be put in place via S106 agreements to ensure compliance with this requirement.
- 8.129 The policy sets out to ensure that affordable housing is not all concentrated in one area of a development site, by requiring it to be grouped in small clusters (3 or 4 dwellings) and to be indistinguishable in appearance from the market housing. This allows for better integration and avoids the affordable housing being immediately identified. The change of policy stance from being pepper-potted throughout the site to small clusters was in response to representations received at the draft plan stage and concerns over the management of affordable properties. Being located in small clusters still avoids areas of concentrations but allows for better management of the properties by Registered Providers.
- 8.130 A modification HAS BEEN PROPOSED into the background text of this policy in relation to the clusters, so they are proportionate to the scale of the overall development, rather than specifying the size (3 or 4 dwellings). This avoids the policy being too prescriptive.

Reasonable Alternatives

- 8.131 Reasonable alternative could see the percentage requirement increased or decreased. However, the Council's Whole Plan Viability Assessment (SD60³¹²) 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). However, any reduction in the percentage level would have a detrimental impact on meeting the identified affordable housing imbalance.
- 8.132 In relation to reasonable alternatives for the tenure split, representations were received to the publication draft suggesting the tenure split be:
- amended to 70% affordable rent and 30% intermediate tenure to avoid the need to submit viability assessments on a regular basis.
 - Removed to provide choice to customers.
- 8.133 However, 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 or removing it all together, as evidence through the 2017 SHMA (SD23) indicates an overall preference for 79.4% social/affordable rent, table 7.9, pg 112. 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.

³¹² [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017_.pdf?m=636803111173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017_.pdf?m=636803111173630000)

Deliverable

Effective

8.134 The policy will be delivered through the submission of planning applications by housing developers, registered Housing Associations and Sunderland Homes and their determination by the Local Planning Authority. Affordable housing will be secured through Planning Obligations.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H2	Affordable homes	To ensure a supply of affordable housing of mixed type and tenure.	<ul style="list-style-type: none"> Consistent and significant shortfall in the delivery of 15% affordable housing on sites of more than 10 dwellings or on sites of 0.5ha or more. Consistent and significant shortfall in the tenure requirements set out in the SHMA 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify projects/interventions to address issues Review of evidence base in regard to affordable housing needs 	<ul style="list-style-type: none"> Percentage of affordable units permitted by site Affordable tenure split of site permissions (compared with the latest SHMA requirements, eg. 80% social rented, 20% intermediate) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHMA

Consistent with National Policy

8.135 The policy sets out the requirement to meet an identified affordable housing need which complies with paragraph 50 of the NPPF.

H3 Student Accommodation

8.136 This policy sets out to ensure that student accommodation is located within the Urban Core to assist in creating a 'University City' and ensure students are well connected with the University.

H3 Student Accommodation

Development of student accommodation should be located within the Urban Core and must demonstrate that:

1. there is a need for additional student accommodation;
2. it is of a scale and appearance appropriate to its surroundings;
3. it is located within close proximity to local facilities and is accessible to the university by foot, cycle and by public transport;
4. it provides high quality living accommodation in terms of design, layout, and facilities provided within the development, in accordance with the Student Accommodation SPD; and
5. the layout of the accommodation is designed in such a way that it is capable of being re-configured through internal alterations to meet general needs housing in the future.

Positively Prepared Vision and Strategic Priorities

8.137 This policy will deliver the spatial vision by helping to revitalise the Urban Core and contributing to creating a University City.

8.138 Policy H3 will help to deliver Strategic Priorities 1, 2, 3, 4 and 6.

Draft Plan Comments

8.139 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Support the focus of student home in the Urban Core, but concerned there will not be sufficient students to fill accommodation.
- U-Student consider Policy H5 to be out-of-date and not in accordance with the latest evidence
- The University of Sunderland objects to the Policy as it is not in accordance with the interim guidance as it does not refer to demand.
- Highways England supports this policy.

How Issues Have Been Taken into Account at Publication Draft

8.140 In response to the comments raised:

- The Council considers that the Policy is based on the latest evidence. With regards the reference to the SPD within the policy, the Interim Student Accommodation Policy was adopted by the Council in July 2015 as an interim measure. This will be updated upon adoption of the Plan and taken through the formal SPD process.

Publication Draft Comments

8.141 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Sunderland University (PD184) supported the policy subject to amendment to confirm which elements of the Urban Core are acceptable for student accommodation and clarify the definition of "student accommodation needs".
- Friends of Sunderland Green Belt (PD3055) objected to the policy on the grounds that recent university statistics suggest that the student population is declining and will continue to decline.

How Issues Have Been Taken into account prior to Submission

8.142 In response to the representation raised by the University of Sunderland (PD184) in relation to a reference to the SPD being included to further define need and avoiding over concentrations, the Council has proposed additional modifications as set out in the Schedule of Modifications (M41+M42). The Council and University of Sunderland have signed a Statement of Common Ground.

8.143 In response to the representations raised by Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as the University have plans and strategies in place to target students in its key growth areas and those of the region, which the Plan 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.

Proposed Modifications to the Publication Draft

8.144 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
6.26	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 <u>and that the proposal will not result in an over concentration of student or shared accommodation.</u>	To address representations submitted by University of Sunderland (PD185).
6.28	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. <u>Further information on need is set out in detail within the Student Accommodation SPD.</u>	To address representations submitted by University of Sunderland (PD184).

Duty to Cooperate

8.145 The policy raises no Duty to Cooperate issues.

Sustainability Appraisal (2017)

8.146 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.147 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.148 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	+	++	++	++	~	~	~	~	+	~	~	~

8.149 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.150 The policy was included within the plan as an increasing number of planning applications were being submitted for student accommodation speculatively and gaining planning approval, yet the number of students within the city who wanted to live in purpose built/converted student accommodation was not increasing at the same rate (see SHMA 2017 (SD23), SCC planning application records and Draft Student Accommodation Interim Planning Guidance 2015) (SP15³¹³).

³¹³ [https://www.sunderland.gov.uk/media/20918/SP-15-Interim-Student-Accommodation-Policy-2015-pdf/SP.15_Interim_Student_Accommodation_Policy_\(2015\).pdf?m=636803124299370000](https://www.sunderland.gov.uk/media/20918/SP-15-Interim-Student-Accommodation-Policy-2015-pdf/SP.15_Interim_Student_Accommodation_Policy_(2015).pdf?m=636803124299370000)

- 8.151 The Council therefore considered that it was necessary to establish a policy to manage applications for student accommodation to ensure that developments were being built in the right areas of the city and that the design, layout and facilities provided high quality living accommodation, in line with student expectations.
- 8.152 The Council currently has an interim planning policy for student accommodation which was adopted to provide guidance on planning applications for such uses until a replacement policy was adopted within the CSDP. Policy H3 will replace the interim policy guidance, with the more detailed guidance contained within the interim policy guidance, updated and taken forward as a Supplementary Planning Document (SPD).
- 8.153 Student accommodation is directed to the Urban Core as Sunderland is seen as a city with a university, yet it lacks the characteristics and qualities of a university city, such as a centre which is bustling with students visiting shops, cafes, bars and restaurants that meet their needs. It is considered that the City Centre needs to be exploited more by student life to bring about these characteristics and qualities to generate more activity, both day and night.
- 8.154 As both the university campuses are located within the Urban Core and within walking distance to the City Centre this should assist in driving forward the university city and ensure students do not feel isolated from the university and its activities.
- 8.155 It is recognised that the Urban Core is mixed use in nature and as such student accommodation is unlikely to have a detrimental impact upon the character or amenity of the area. Concentrating student accommodation within the urban core may mean the area has more potential to support more student orientated facilities and services, benefiting the students and creating the university city Sunderland currently lacks.
- 8.156 By concentrating student accommodation within the urban core, this should assist in developing a vibrant City Centre, which is one of the council's priorities. This is also in line with the City Council's Economic Masterplan (SP30), to assist in creating a University City (see Aim 1, pg 20). This will help to revitalise the urban core which is a key part of the overarching vision for the plan.
- 8.157 Notwithstanding the creation of a university city, student accommodation numbers need to be managed in line with projected student numbers in order to avoid an oversupply of student accommodation, which cannot easily be converted to other uses.
- 8.158 Students expect high quality accommodation with a range of facilities included, as such the policy aims to ensure that developments provide this element of quality within the design, layout and facilities provided, whilst ensuring choice and value for money so students can opt for different types of accommodation depending on their circumstances.
- 8.159 As with most new development, the scale and appearance of the accommodation is required to be appropriate to its surroundings. Due to the locational requirements of the policy, accommodation will most likely be in close proximity to local facilities, however in order to contribute to student safety, the accommodation is required to be easily accessible to the university campuses by a choice of transport means and by direct footpath links.
- 8.160 In certain circumstances student accommodation blocks do not become fully occupied and developers may consider alternative uses, which are acceptable in planning terms. To make this change more cost effective the policy sets out to ensure that the layout of

accommodation from the outset is designed in a way that is capable of being re-configured through internal alterations, so to avoid having vacant buildings within the Urban Core.

Reasonable Alternatives

8.161 A reasonable alternative could be to not place locational requirements on new student accommodation. However, this may result in developments occurring outside of the Urban Core, which may be unsustainable and have a detrimental impact on existing residential communities. It is also considered that developing accommodation outside of the urban core will not contribute to the creation of a vibrant university Urban Core/City Centre and its regeneration.

8.162 An alternative suggested through the consultation process was to exclude Stadium Village from the urban core for student accommodation proposals. However, this was not considered reasonable as Stadium Village is considered a very sustainable location that is within very close proximity to St Peter's campus and within walking distance of the City Centre and has a metro station/bus connections very close by.

Effective

Deliverable

8.163 The policy will be delivered by planning applications for student accommodation submitted by developers and determined by the Local Planning Authority. The monitoring of student accommodation units within the city will be undertaken by both the Local Authority and the University of Sunderland to allow the need element of the policy to be justified when planning applications are submitted, to ensure the city does not end up with an oversupply of accommodation.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H3	Student accommodation	To ensure choice for students within the City Centre	<ul style="list-style-type: none"> The number of student bed-spaces outside the Urban Core The number of units reconfigured to meet general housing need 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify projects/interventions to address issues Identify the appropriate sites within the Urban Core 	<ul style="list-style-type: none"> Number of students Number of student bed-spaces with the Urban Core Number of student bed-spaces outside the Urban Core 	<ul style="list-style-type: none"> SCC monitoring data Planning applications University of Sunderland monitoring data SHLAA

Consistent with National Policy

8.164 Although the NPPF does not make specific reference to student accommodation it does state in paragraph 50 that local authorities should plan for the needs of different groups in the community.

H4 Travelling Showpeople, Gypsies and Travellers

8.165 To ensure the needs of Sunderland's Travelling Showpeople community are met Policy H4 safeguards existing sites, allocates new sites to meet short term needs and identifies broad locations for medium/longer term needs.

H4 Travelling Showpeople, Gypsies and Travellers

1. The needs of Travelling Showpeople will be met by:
 - i. allocating land for new Travelling Showpeople sites at Station Road North, and Land at Market Place Industrial Estate, to accommodate 15 plots in the short term;
 - ii. identifying broad locations at Station Road/Pearsons Industrial Estate and Market Place Industrial Estate to accommodate 18 plots to meet medium and longer term needs; and
 - iii. safeguarding the existing Travelling Showpeople sites at Pearson Industrial Estate, Sunnyside/Grasswell, Stephenson Industrial Estate and Herrington Burn, unless it can be demonstrated that:
 - a. there is no longer a need for the site, or
 - b. capacity can be better met elsewhere.
2. Where additional need is identified, development of new plots/pitches for Travelling Showpeople and Gypsies and Travellers should:
 - i. be accessible to public transport, services and facilities, and be capable of support by local social infrastructure;
 - ii. be capable of connection to energy, water and sewage infrastructure;
 - iii. provide safe access to and from the main road network;
 - iv. support the health and well-being of the occupiers;
 - v. provide an appropriate layout and facilities;
 - vi. not adversely affect the character of the immediate area, the amenity of nearby residents or the operations of adjoining land uses;
 - vii. not have an adverse effect on the health and well-being of any site occupiers or on others as a result of new development; and
 - viii. be of sufficient size to accommodate plots/pitches of an appropriate size and, in the case of Travelling Showpeople, to accommodate appropriate levels of storage space.

Positively Prepared

Vision and Strategic Priorities

8.166 This policy will deliver the spatial vision by ensuring the city offers a mix of good quality housing of the types, sizes and tenure that meet the needs of existing and future communities and offers residents the opportunity to live in sustainable communities.

8.167 Policy H4 will help to deliver Strategic Priorities 1, 2 and 4

Draft Plan Comments

8.168 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Residents were particularly concerned that the Plan would allocate a permanent site for stop-over gypsies.
- The Environment Agency supports the policy but requests it is amended to ensure that where it is not possible to connect to water and sewage infrastructure a foul drainage assessment would need to be carried out.
- Siglion challenged the methodology for selecting the stop-over site. They expressed concerns that that two of the sites are designated employment sites and therefore the Council must demonstrate in accordance with Policy E3 how the sites are surplus to requirement. They consider the most appropriate site to be Hetton Lyons.
- Concerns over the methodology for selecting the sites.
- In regards to the three potential sites identified residents expressed the following comments:

- Leechmere
 - Impact on surrounding residential population
 - Impact on residential amenity
 - Proximity to industrial estate
 - Businesses will relocate
 - Proximity to care home
- Hetton
 - Proximity to Park
 - Loss of cultural facilities
 - Durham Bird Club raised concerns that a stop-over site is in a sensitive area and could have an impact on wetland species.
- Hendon
 - Impact on residential amenity
 - Proximity to industrial estate
 - Impact of existing businesses on gypsy site
 - Utilities impact

How Issues Have Been Taken into Account at Publication Draft

8.169 In response to the comments raised:

- As the city has a small number of encampments each year the Plan does not include an allocated site for a stop-over site. Rather than allocate a formal site, the Council consider that the most appropriate approach to meeting the accommodation needs of Gypsies and Travellers within the city is to utilise the Councils 'acceptance policy' for unauthorised encampments.

Publication Draft Comments

8.170 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- A resident suggests there is no proven demand for the allocation of land for Travelling Showpeople it is not in the public interest to allocate land for this use.
- A resident highlighted specific concerns in regard to access arrangements, impact on the local road network, safety of local children and noise generation with the proposed site allocation.

How Issues Have Been Taken into account prior to Submission

8.171 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by residents the Council does not feel it necessary to make any modifications as Sunderland's Gypsy and Traveller and Travelling Showpeople accommodation Assessment Update (2017) (SD26) identifies the need for a total of 33 plots for Travelling Showpeople over the 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.

8.172 Any noise impact on existing residential properties to the south at Lake Road and to the west will be limited. Screening could also be put in place between the existing industrial estate and the proposed site. Consideration could 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. As large refuse vehicle access the site currently, amenity issues with large trucks carrying fairground equipment would have no further impact on the amenity of nearby residential properties. Access to the site is considered wide enough for vehicles carrying fairground equipment. It is currently accessed by large refuse vehicles and the safety element should be no worse due to the current operation of the depot.

Duty to Cooperate (SD11)

8.173 Due to the transient nature of the gypsies and travellers and the existing travelling Showpeople communities that reside in Sunderland, South Tyneside and Durham, the provision of plots and pitches is a strategic cross boundary issue.

South Tyneside

8.174 Both authorities worked together to commission a Gypsies and Travellers and Travelling Showpeople Assessment in 2014. This identified each authorities local needs. Sunderland City Council updated this assessment in 2017 (SD26). The 2017 update covered Sunderland’s administrative boundary only and was not a joint assessment undertaken with South Tyneside Council, as they took a decision not to progress a joint update, largely due to the different stages of the authorities in the plan making process and their not being a pressing need to undertake a review of their evidence base at that point in time. The authorities will continue to work together to monitor local needs and will continue to discuss any future impacts and consider joint working where appropriate.

Durham County Council

8.175 In cooperation with Durham County Council, Sunderland City Council have discussed needs and site provision for gypsies and travellers and taken advice to progress site provision within Sunderland. Sunderland are addressing their local needs and therefore there are no cross boundary issues. The authorities will continue to work together to monitor local needs and will continue to discuss any future impacts and consider joint working where appropriate.

Sustainability Appraisal (2017)

8.176 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
Blue	Green	Green	Light Green	Green	Green	Green	Blue	Light Green	Blue	Blue	Light Green	Blue	Blue	Blue

8.177 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.178 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	+	++	++	++	~	+	~	~	+	~	~	~

8.179 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.180 Sunderland has an established community of travelling showpeople residing mainly within the Coalfield area of the city, (a small site is also located within north Washington) (SD26³¹⁴). As such a needs assessment was undertaken to identify future housing requirements, this assessment also included the accommodation needs of Gypsies and Travellers. The

assessment concluded that an additional 33 plots were required over the plan period (of which 15 are required short-term, until 2022/23) for travelling showpeople and some form of stop-over provision should be considered to meet the needs of gypsies and travellers unauthorised encampment activity. (Sunderland Gypsy and Traveller and Travelling Showpeople Accommodation Assessment (July 2017) – paras 7.17-7.21, pg 43-44) (SD26).

- 8.181 The Council have actively sought to identify appropriate sites for travelling showpeople and stop-over pitches for gypsies and travellers as set out within the Gypsy and Traveller Site Assessment Report 2017, section 6, paras 6.1-6.6, pg 4-5 (SD28).
- 8.182 As such as part of the Draft Plan 2017 consultation process two sites were put forward for travelling showpeople and consulted upon, a small area of green space at Station Road North, Hetton-le-Hole and the council depot at Market Place Industrial Estate, Houghton-le-Spring. Three sites were considered appropriate and consulted upon for gypsy and traveller 'stop over' provision, Hendon Road East, Leechmere Industrial Estate and Car Park at Hetton Lyons Ponds. Gypsy and Traveller Site Assessment Report 2017, paras 7.1-7.24, pg 5-11) (SD28).
- 8.183 A number of objections were received to the proposed travelling showpeople sites and an extensive amount of opposition to all three of the identified gypsy and traveller sites from the general public and businesses. Additional information was also brought to light on how the proposed gypsy and traveller sites are currently used and the surrounding land uses operate.
- 8.184 As part of the Council's duty to cooperate meetings with its neighbouring authorities, the Council had further discussions with neighbouring County Durham regarding how they meet stop-over needs for gypsies and travellers. Following this it was considered that due to the small number of encampments the city encounters and the nature of the encampments, only having a small number of caravans on them, then a tolerated unauthorised encampment procedure might prove more effective in enabling transit, rather than a dedicated stop-over site. This is the procedure Durham has in place and they encounter an average of 224 unauthorised encampments a year. Officers from Durham also explained that from their experience it is unlikely that a site so small in size in Sunderland would be used.
- 8.185 Following the consultation the Council also had further discussions with the Police, the Council's security team and Street Scene service who deal with unauthorised encampments when they visit the city. They have indicated that allocating a site will not, from their experience, help address the need and if an unauthorised encampment was to take place within the city and notice was given for them to leave and move to the authorised site, they would most likely leave the city rather than travel to the authorised site.
- 8.186 As such, it was considered that the most appropriate approach to meeting the accommodation needs of Gypsies and Travellers within the city is to have an 'acceptance policy' in place for unauthorised encampments. (Sunderland City Council Unauthorised Encampment Policy 2018) (SP17³¹⁵). This acceptance approach to encampments allows Gypsies and Travellers to reside within the city for an agreed number of days providing the location is suitable and a code of conduct is followed, (there will be instances where the location of unauthorised encampments will not normally be accepted by the council. In these instances the travellers will be asked to leave the site and an alternative safe location offered). Due to the small number of encampments the city experiences, it is considered that

³¹⁵ [https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_\(2018\).pdf?m=636803124834270000](https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_(2018).pdf?m=636803124834270000)

this approach is proportionate to the needs. (The full justification for the removal of the stop over site for Gypsy and Travellers is set out within the Sunderland Gypsy and Traveller and Travelling Showperson Accommodation Assessment Addendum 2018) (SD27³¹⁶).

8.187 An informal interim review has been undertaken on the Council’s Unauthorised Encampment Policy (September 2018) (SP17) to ensure it is working as intended. This review indicated that overall the policy is working and there appears to be no evidence at this stage for a permanent stop over site. The policy will continue to be monitored throughout the year and if needed the appropriate route will be taken to allocate a site in the future.

8.188 The proposed allocation of the two sites for travelling showpeople are to meet short-term needs. The site at Station Road North is an area of open space and is located to the north of Pearson’s Industrial Estate. It has no vehicular access to the site and pedestrian access is via a footpath to the northern edge of the site. The site is adjoined to the north by a tree belt and the Hetton Burn, with industrial units to the far north. To the east lies Hetton Lyons Country Park and allotments adjoin the site to the west. To the south of the site are existing travelling showpeople’s yards which are located within Pearson’s Industrial Estate. It is at this point that vehicular access to the site would need to be taken, due to it being land locked (for vehicles) from all other directions. The site is within close proximity of local shops, schools and health facilities and transport links at Hetton-le-Hole centre.

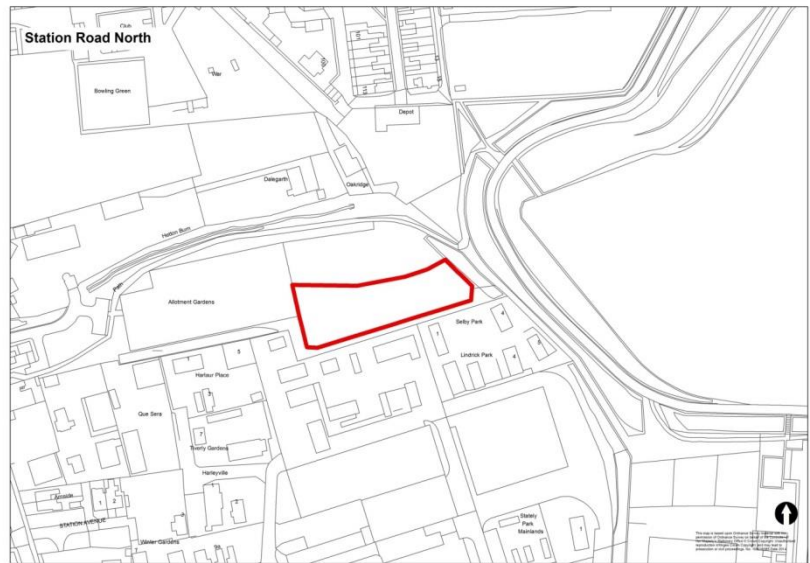


Figure 33 Station Road North

8.189 This area of open space is used infrequently due to the close proximity of Hetton Lyons Country Park, which is adjacent. The area itself has an abundance of open space and is above city levels in terms of green space quantity. However, the northern part of the site will either remain as open space or possibly be utilised as a storage area, due to flooding issues from the Hetton Burn, restricting the

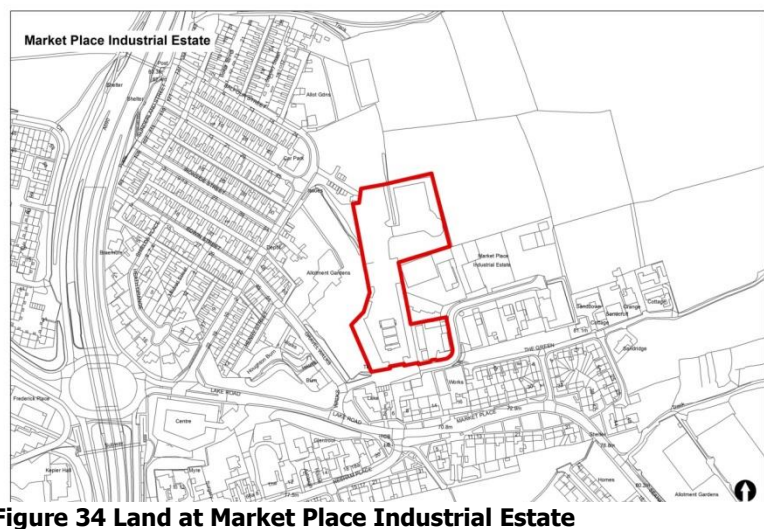


Figure 34 Land at Market Place Industrial Estate

³¹⁶ [https://www.sunderland.gov.uk/media/20610/SD-27-Sunderland-Gypsy-and-Traveller-and-Travelling-Showperson-Accommodation-Assessment-Addendum-2018-.pdf/SD.27_Sunderland_Gypsy_and_Traveller_and_Travelling_Showperson_Accommodation_Assessment_Addendum_\(20.pdf?m=636802951061430000](https://www.sunderland.gov.uk/media/20610/SD-27-Sunderland-Gypsy-and-Traveller-and-Travelling-Showperson-Accommodation-Assessment-Addendum-2018-.pdf/SD.27_Sunderland_Gypsy_and_Traveller_and_Travelling_Showperson_Accommodation_Assessment_Addendum_(20.pdf?m=636802951061430000)

area of land that can be used for caravan/chalet type accommodation. In terms of noise and disturbance from working on machinery, as the site is not adjoined by general residential properties it is not considered that the use of the site will be detrimental to existing residents. The site is in council ownership and it is considered deliverable and discussions have taken place with the travelling showpeople who adjoin the site to the south with regards access.

- 8.190 The site at Market Place Industrial Estate in Houghton-le-Spring is located on the edge of the Industrial Estate is currently in operation as a council depot, which is programmed for closure within the next two years. It is adjoined to the north by open space, to the west by both open space and industrial uses (vehicle repair unit adjoin the site). To the south, separated by an access road, lie a mix of industrial uses and the rear of residential properties which front Lake Road. Allotments adjoin the site to the west. Both vehicular and pedestrian access to the site is taken from Lake Road/Gravel Walks. The site is within close proximity to facilities at Houghton-le-spring Town Centre and has schools nearby. Local facilities are also available nearby.
- 8.191 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.
- 8.192 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 southern or eastern 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.
- 8.193 Concerns have arose during the consultation process regarding vehicular access to the site, however 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.
- 8.194 With regards the longer term broad locations for travelling showpeople that are identified within the policy, the Station Road/Pearson's Industrial Estate is an expansion area around the existing showpeople site at Pearson's yard and around the proposed site allocation, which could naturally accommodate travelling showpeople due to the commercial/mixed use nature of the area. The broad location at Market Place Industrial Estate, is an area of land which covers land to the north and west of the site allocation, again a natural extension area.
- 8.195 The future appearance of the area has been raised by an objector with reference to the proposed broad location. 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.

- 8.196 In addition to the proposed site allocations the policy sets out criteria for consideration when planning applications are submitted should additional need be identified for both travelling showpeople and gypsy and travellers. The criteria is in place to ensure sites are in sustainable locations, suitable, accessible and provide an appropriate level of amenity for both existing nearby residents/occupiers and proposed residents of the site.

Reasonable Alternatives

- 8.197 Sunderland's Gypsy and Traveller and Travelling Showpeople accommodation Assessment (2017) (SD26³¹⁷) identifies the need for a total of 33 plots for Travelling Showpeople over the 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.
- 8.198 One potential alternative would be not to allocate (sufficient) land to meet these identified needs. However, this is not considered to be a reasonable alternative as the need for additional plots has been established at a local level within the city boundaries and it would not be appropriate to seek to meet this need within neighbouring authorities, each of whom will have to provide sufficient plots to meet their own identified needs.
- 8.199 The Draft Plan (2017) (SP1) identified three potentially suitable sites as stop-over locations for Gypsies and Travellers, on the basis that it may be necessary to allocate one to meet identified needs. Policy H4 no longer proposes to allocate stop-over sites as given the small number of plots that would be required it is instead proposed to apply acceptance criteria within Sunderland City Council's Unauthorised Encampment Policy 2018 (SP17³¹⁸).
- 8.200 A reasonable alternative would however be to retain the approach of allocating a stop-over site from the three preferred locations that were previously identified. However, it is considered that this will not necessarily resolve the issue as it is anticipated that the site would not be utilised and it may potentially cause unnecessary upset to residents.

Effective Deliverable

- 8.201 A number of options are available to the Council for the delivery of the Travelling Showpeople sites, which are both in council ownership. These include a sale of the 'bare land' to a single entity developer who would develop the infrastructure and then sell or lease the plots to occupiers. A sale of the 'bare land' to a consortium of occupiers who would collectively develop the infrastructure then occupy themselves or the Council could develop the infrastructure itself then sell or lease the plots to the occupiers. Any other applications for Gypsy and Traveller or Travelling Showpeople sites will be assessed against the criteria contained within the policy. The Council's Unauthorised Encampment Policy 2018 (SP17³¹⁹) will be used to manage any unauthorised encampments.

³¹⁷ [https://www.sunderland.gov.uk/media/20869/SD-26-Sunderland-Gypsy-and-Traveller-and-Travelling-Showperson-Accommodation-Assessment-2017-/pdf/SD.26_Sunderland_Gypsy_and_Traveller_and_Travelling_Showperson_Accommodation_Assessment_\(2017\).pdf?m=636802950628300000](https://www.sunderland.gov.uk/media/20869/SD-26-Sunderland-Gypsy-and-Traveller-and-Travelling-Showperson-Accommodation-Assessment-2017-/pdf/SD.26_Sunderland_Gypsy_and_Traveller_and_Travelling_Showperson_Accommodation_Assessment_(2017).pdf?m=636802950628300000)

³¹⁸ [https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_\(2018\).pdf?m=636803124834270000](https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_(2018).pdf?m=636803124834270000)

³¹⁹ [https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_\(2018\).pdf?m=636803124834270000](https://www.sunderland.gov.uk/media/20919/SP-17-Sunderland-City-Council-Unauthorised-Encampment-Policy-2018-/pdf/SP.17_Sunderland_City_Council_-_Unauthorised_Encampment_Policy_(2018).pdf?m=636803124834270000)

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H4	Travelling showpeople, gypsies and travellers	To enable the provision of suitable sites for travelling showpeople and sets the criteria against which sites for gypsies and travellers will be assessed	<ul style="list-style-type: none"> • Significant increase in unauthorised gypsies and traveller encampments • Failure to deliver 15 plots for travelling show people by 2023 and a further 18 plots by 2033 • Significant loss of existing Travelling Showpeople sites/plots 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Plan/Policy • Regular review of evidence base to determine need and potential review of the plan 	<ul style="list-style-type: none"> • Plots created on allocated travelling showpeople sites • Travelling showpeople plots created on unallocated sites • Gypsy & traveller pitches created on unallocated G&T sites 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Gypsies, Travellers and Travelling Showpeople Accommodation Assessment (GTAA)

Consistent with National Policy

8.202 Planning Policy for Travellers Sites was published in August 2015 and sets out the Government's aims in respect of travellers sites. The evidence supporting Policy H4 has assessed the need to provide for travelling communities and sought to address that need. The policy allocates sites to meet needs in the short term and identified broad locations for growth for sites in the medium to longer term in accordance with the Planning Policy for Traveller Sites.

H5 Existing homes and Loss of Homes

8.203 The existing homes in Sunderland remain its most important asset and as such Policy H5 sets out to protect the existing housing stock, including bringing empty properties back into use.

H5 Existing Homes and Loss of Homes

1. The council will support development which would bring empty properties back into use.
2. Development which would result in the loss of residential housing stock, particularly family housing, through change of use or redevelopment will not be permitted unless it is demonstrated that
 - i. the dwelling(s) no longer provide accommodation of a satisfactory standard;
 - ii. it is financially unviable to improve or adapt the existing dwelling(s); and
 - iii. the locality and character of the surroundings are no longer appropriate for residential use.
3. Where replacement housing is proposed, the new dwelling(s) should align to the needed type, mix or tenure of housing identified in the most recent SHMA.

Positively Prepared

Vision and Strategic Priorities

8.204 This policy will deliver the spatial vision by helping to offer residents the opportunity to live in sustainable communities accommodating all ages and abilities and offering a mix of good quality housing of types, sizes and tenures that meet the needs of existing and future communities.

8.205 Policy H5 will help to deliver Strategic Priority 4.

Draft Plan Comments

8.206 The Council received no submissions to this policy.

Publication Draft Comments

8.207 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Historic England supports the intention to bring empty properties back into use, particularly in 'Sunderland Historic High Streets' Heritage Action Zone.

How Issues Have Been Taken into account prior to Submission

8.208 No issues have been raised against this policy.

Duty to Cooperate (SD11)

8.209 No duty to cooperate issues have been identified.

Sustainability Appraisal (2017)

8.210 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.211 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.212 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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8.213 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.214 The Council recognises the existing housing stock in Sunderland remains its most important asset and as such, the loss of existing housing stock will be carefully considered. Bringing an empty property back into residential use or modernising an older property is considered more sustainable than its loss, as it not only contributes to the housing supply but helps to rejuvenate streets, areas and communities blighted by long term empty properties. As the number of long term empty properties increase and decrease over short periods of time evidence indicates that over the past five years there has been an overall net loss, with more properties becoming empty than brought back into use.

Table 25 Long Term Empty Property Data

	Unoccupied Over 6 Months	Net Returned To Use	Cumulative Net Return To Use
01/04/2012	2470		
01/04/2013	2266	204	204

01/04/2014	2219	47	251
01/04/2015	2270	-51	200
01/04/2016	2476	-206	-6
01/04/2017	2566	-90	-96
01/04/2018	2856	-290	-386

8.215 The Council’s strategy for empty homes is to prioritise longer term empty properties (over 6 months) in targeted areas and utilise a series of implementation measures to ensure that empty properties are continually brought back into use, such as financial assistance packages, use of enforcement powers, implementation of s215 of the Town and Country Planning Act 1990 and the compulsory purchase of properties. An element of funding is committed from S106 contributions, New Homes Bonus and Homes England to return empty properties back into use.

8.216 However, the Council does understand that the retention of existing housing is not always appropriate and in certain instances losses are unavoidable. When clearance does occur, the redevelopment of residential areas can also help to contribute to creating improved living environments by new stock being better aligned to the required house types and sizes of the area. The policy seeks to support the loss of existing housing stock as part of large scale housing area renewal schemes, where they are supported by a detailed feasibility study or neighbourhood assessment to inform a Housing Delivery Plan, alternatively, Masterplans may be used to guide future development.

Reasonable Alternatives

8.217 No reasonable alternatives identified.

Effective

Deliverable

8.218 The policy will be delivered through the submission and determination of planning applications which would result in the loss of residential stock, replacement dwellings, or where they would bring empty properties back into use. The Council will work closely with partners including Homes England and Housing Associations to help bring vacant properties back into use.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H5	Existing Homes and Loss of Homes	To use the existing housing stock/buildings as efficiently as possible	<ul style="list-style-type: none"> Significant increase in vacancy rate of existing stock Significant increase in the number of dwellings lost through demolition or change of use 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Work with partners to actively bring vacant 	<ul style="list-style-type: none"> Number of homes lost through demolition, conversions and changes of use (gross and net) Number and percentage of vacant dwellings 	<ul style="list-style-type: none"> SCC monitoring data Planning applications SHLAA SHMA

				dwellings back into use and demolitions and clearance or regeneration	and empty properties <ul style="list-style-type: none"> • Number of long-term vacant dwellings (6+ months) 	
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Consistent with National Policy

8.219 Paragraph 51 of the NPPF states that local authorities should identify and bring back into use empty housing and buildings in line with local strategies. This is reflected in Policy H5.

H6 Homes in Multiple Occupation (HMOs)

8.220 Concentrations of shared housing can often have a detrimental effect on the character and function of an area and impact on the local amenity and neighbouring properties. Policy H6 is in place to ensure that proposals for Homes in Multiple Occupation do not have detrimental effects on an area.

H6 Homes in Multiple Occupation (HMOs)

Development for HMOs should ensure that:

1. the property is located where increased traffic and activity would not be detrimental to local amenity;
2. the intensity of use would not adversely affect the character and function of the locality;
3. the proposal would not be detrimental to the amenities of neighbouring properties by causing undue noise and disturbance;
4. adequate provision for parking, servicing, refuse, recycling arrangements and the management and maintenance of the property can be demonstrated through the submission of a management plan; and
5. the proposal would not result in an over concentration of HMOs within the locality.

Positively Prepared

Vision and Strategic Priorities

8.221 This policy will deliver the spatial vision by ensuring the city offers a mix of good quality housing of the types, sizes and tenures that meet the needs of existing and future communities and offers residents the opportunity to live in sustainable communities.

8.222 Policy H6 will help to deliver Strategic Priorities 1, 2 and 4

Draft Plan Comments

8.223 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- The University of Sunderland broadly supported the policy but asked for further text to make reference to a potential over supply.

How Issues Have Been Taken into Account at Publication Draft

8.224 In response to the comments raised:

- The Council has updated this Plan to reflect comments from the University, but as the Plan should be read as a whole these updates have been made in the Student Accommodation policy.

Publication Draft Comments

8.225 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Friends of Sunderland Green Belt suggest policy H6 is not justified as it would be most appropriate to use existing stock as opposed to building new, larger houses, to rebalance the stock.

- The University of Sunderland (PD185) support the policy but propose a modification to point 5 to ensure consistency with other housing policy documents and avoid over supply when looking at HMOs and student accommodation collectively.

How Issues Have Been Taken into account prior to Submission

8.226 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by Friends of Sunderland Green Belt, the Council does not feel it necessary to make any modifications as 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 recognises that to convert back to a single large dwelling house is not always viable.

8.227 In response to the representations raised by the University of Sunderland (PD185), the Council does not feel it necessary to make any modifications. The Council and University of Sunderland have signed a Statement of Common Ground and the Council has proposed an additional modification as set out in the Schedule of Modifications (M41).

Duty to Cooperate (SD11)

8.228 No duty to cooperate issues have been identified.

Sustainability Appraisal (2017)

8.229 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.230 The SA made no recommendation for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.231 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	++	++	~	~	~	~	~	~	~	~	~	+	~	~

8.232 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.233 The city has over 1,000 properties which are classed as Homes in Multiple Occupation (HMOs), with the majority of these predominately concentrated in established residential areas, in wards such as Millfield, St. Michael's, Hendon and St Peter's. These properties are in areas that once provided large family homes, which have over time become too big for families and as such have been converted to HMO's or in areas of low market demand where options are limited and as such have been utilised as shared accommodation.

8.234 Due to the nature of these types of properties they tend to result in high concentrations within a particular area and if not managed correctly they can be detrimental to the amenity, character and function of an area. As such, this policy is in place to ensure that when proposals come forward for this type of use they can be adequately managed and appropriate planning conditions placed on developments to ensure they are not detrimental to the area.

8.235 Point 5 of the policy ensures that over concentrations do not occur, and as such each proposal will be judged on its individual merits, taking account of the number of existing

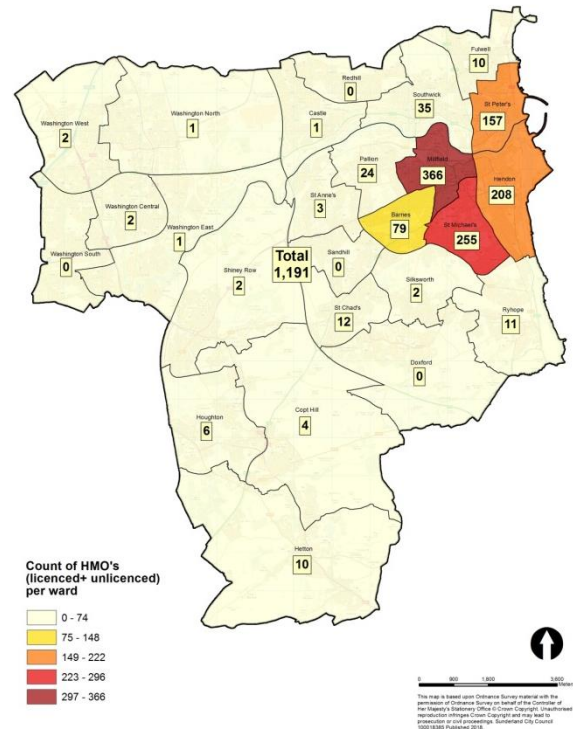


Figure 35 HMOs within Sunderland

HMO's within the locality. Five wards within the city have been problematic with HMO properties historically and as such Article 4 directions have been placed on these areas (Barnes, Hendon, Millfield, St. Michael's and St.Peter's), removing permitted development rights and preventing the change of use to an HMO without planning approval.

8.236 The council's intention is to take forward the the evidence base on HMOS's and produce further guidance through a Supplementary Planning Document. This document will consider in detail the over concentration element of the policy and look into setting thresholds for particular problematic areas/streets.

8.237 Concerns were raised during the consultation process regarding the policy and it was suggested that 'it is better to use existing stock as larger houses if there is a need to rebalance the stock'. However, it is not always viable for larger properties of this nature to remain

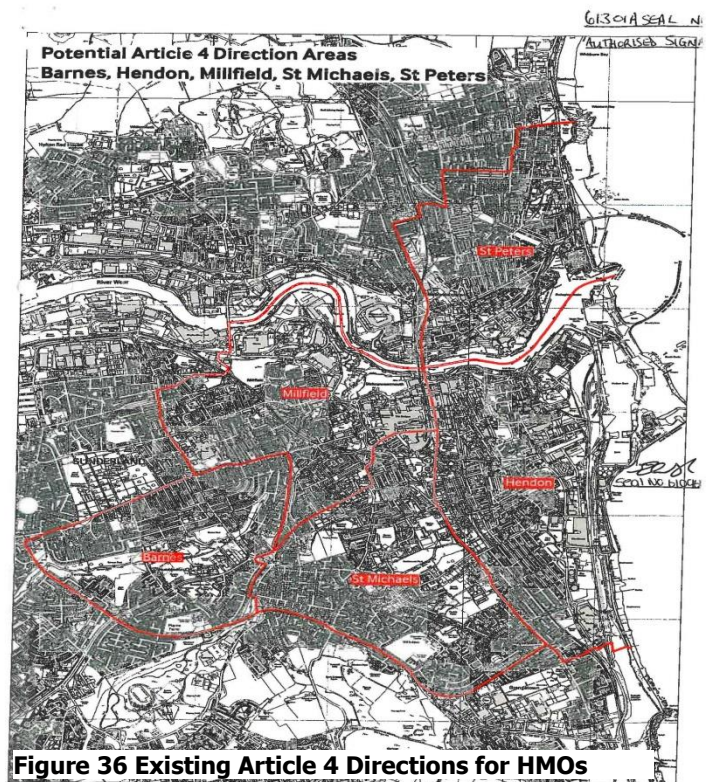


Figure 36 Existing Article 4 Directions for HMOs

as one house and as such in certain instances proposals will come forward for them to be used as HMOs. The purpose of the policy is to manage this process to ensure they are not detrimental to the area.

Reasonable Alternatives

8.238 There are no reasonable alternatives.

Effective Deliverable

8.239 The policy will be delivered by the submission of planning applications and the use of appropriate planning conditions. The Council also propose to prepare a Supplementary Planning Document which will set out more detailed guidance on the management of HMOs.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H6	Homes in multiple occupation	To ensure that HMOs do not have a detrimental impact on the surrounding area	<ul style="list-style-type: none"> Significant increase in the number of HMOs Significant increase in the concentration of HMOs in a specific area 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify interventions to address issues Review existing and consider the use of new Article 4 Directions Review HMO SPD 	<ul style="list-style-type: none"> Number of HMO units and bedspaces permitted Number of licensable HMOs Number of licensable HMOs in each electoral Ward 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Housing Team data SHMA HMO SPD

Consistent with National Policy

8.240 Although the NPPF does not make specific reference to HMOs, it does state in para 50 that local authorities should plan for the needs of different groups in the community. There is an identified increase in the number of HMOs in the City that is meeting a demand for student accommodation but it needs to be planned for and managed appropriately which is the aim of this policy.

H7 Backland and Tandem Development

8.241 In order to ensure the local distinctiveness and unique character of some of Sunderland's mature suburbs is not lost through development pressure policy H7 is in place to set out when proposals for residential development within an existing curtilage would be acceptable.

H7 Backland and Tandem Development

The development of residential new build within the curtilage of an existing dwelling should:

1. be of a form and scale that respects the local character of the area with regard to density, size and massing of existing buildings;
2. have a plot depth that is appropriate in size and would offer an adequate level of separation between dwellings;

3. ensure that an acceptable level of amenity is retained;
4. demonstrate suitable access, having regard to existing dwelling frontages and street scenes; and
5. ensure existing landscape and streetscape features (e.g. mature trees or other landscape features), are integrated into the development.

Positively Prepared

Vision and Strategic Priorities

8.242 This policy will deliver the spatial vision by helping to offer residents the opportunity to live in sustainable communities accommodating all ages and abilities and offering a mix of good quality housing of types, sizes and tenures that meet the needs of existing and future communities.

8.243 PolicyH7 will help to deliver Strategic Priority 4.

Draft Plan Comments

8.244 As set out in the Consultation Statement (SD07), no key issues were raised against Policy H7.

How Issues Have Been Taken into Account at Publication Draft

8.245 As set out in the Consultation Statement (SD07), no key issues were raised against Policy H7.

Publication Draft Comments

8.246 As set out in the Consultation Statement (SD07), no issues were raised during Publication Draft consultation.

How Issues Have Been Taken into account prior to Submission

8.247 As set out in the Consultation Statement (SD07), no issues were raised during Publication Draft consultation.

Duty to Cooperate (SD11)

8.248 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

8.249 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

8.250 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD6)

8.251 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	++	++	~	~	~	~	~		~	~	~	~	+	++

8.252 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

8.253 The spacious nature and low density of some of Sunderland’s mature suburbs has led to development pressure for the intensification of existing housing areas through development of backland plots, with an average of six plots³²⁰ being developed each year. This can have a significant impact on local distinctiveness and conservation by the erosion of the unique character that makes these places special, particularly if the principles of good design are not taken into account. It is essential therefore that if development takes place in these areas, that it is appropriate in all respects and that it makes a positive contribution to the environment and community within which it is located, to ensure the local distinctiveness and character of these areas is maintained, whilst retaining acceptable levels of amenity for existing residents.

Reasonable Alternatives

8.254 No reasonable alternatives identified.

Effective Deliverable

8.255 The policy will be delivered through the submission and determination of planning applications for development of new build residential units within the curtilage of an existing dwelling.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
H7	Backland and tandem development	To protect the character of Sunderland’s mature suburbs	<ul style="list-style-type: none"> Increase in number of applications granted for backland or tandem development Significant increase in number of dwellings completed on backland or tandem sites 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Number of new dwellings permitted within curtilage of existing dwellings 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

8.256 Para 53 of the NPPF states that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens. The policy has been positively worded and sets out where such development would be acceptable.

³²⁰ Sunderland City Council Planning records

9. Economic Growth

EG1 Primary Employment Areas

- 9.1 Primary Employment Areas are those existing employment areas which are considered essential to the long-term success of Sunderland. The purpose of the policy is therefore to ensure that these sites are sufficiently protected and can continue to function as an important asset for the future economic development Plan area.

EG1 Primary Employment Areas

1. The following areas are allocated as Primary Employment Areas (as designated on the Policies Map) and will be safeguarded for B1 (Business – excluding B1a), B2 (General Industrial) and B8 (Storage and Distribution) employment uses:
 - i. Sunrise Business Park (PEA1);
 - ii. Rainton Bridge (North) (PEA2);
 - iii. Glover (PEA3);
 - iv. Pattinson North (PEA4);
 - v. Pattinson South (PEA5);
 - vi. Stephenson (PEA6);
 - vii. Wear (PEA7);
 - viii. Nissan (PEA8);
 - ix. Turbine Park (PEA9); and
 - x. Hillthorn Farm (PEA10).
2. The following areas are allocated as Primary Employment Areas and will be safeguarded for B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution) employment uses:
 - i. Doxford International (PEA11);
 - ii. Hylton Riverside (PEA12); and
 - iii. Rainton Bridge South (PEA13).
3. Development within the Primary Employment Areas that is not within a B Use Class will not normally be permitted; unless:
 - i. for small ancillary uses where these can be shown to genuinely support, maintain or enhance the business and employment function of the area (shops (A1) including sandwich bars or Cafes (A3) including snack bars);
 - ii. the maximum permitted floorspace for individual ancillary units will be 50sqm (gross); and
 - iii. the number and distribution of units would result in an over-concentration that might affect the function and appearance of the area.
4. Exceptionally, other uses will be considered on their merits. In all cases new uses must:
 - i. be of a type, scale and appearance compatible with the established character and function of the Primary Employment Area;
 - ii. not adversely prejudice the day-to-day operation of the Primary Employment Area through parking, traffic generation or pedestrian movement; and
 - iii. not result in an unacceptable dilution of the employment function of the Primary Employment Area.

Positively Prepared

Vision and Strategic Priorities

- 9.2 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing.
- 9.3 Policy EG1 will help to deliver Strategic Priorities 1, 2 and 5.

Draft Plan Comments

- 9.4 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:
- Town End Farm Partnership suggest that the IAMP should be included in this policy.
 - Siglion consider the Policy should be more flexible to allow for mixed use development.
 - Highways England support this policy.

How Issues Have Been Taken into Account at Publication Draft

- 9.5 In response to the comments raised:
- The Plan has not been updated to include IAMP in the Policy as it will be delivered through the IAMP AAP which establishes a policy framework for its development.
 - The ELR has identified the amount of land needed for employment during the Plan period. The sites proposed to be designated in this policy are required to meet this need and therefore it is not appropriate to allow residential development on these sites. The policy is flexible to enable land to come forward for alternative uses, where exceptional circumstances exist.

Publication Draft Comments

- 9.6 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:
- The National Grid (PD807) support the policy and highlighted that Primary Employment Sites PEA4, PEA8, PEA10 are crossed by National Grid High voltage electricity transmission overhead lines.
 - Prestige Car Direct Property Services (PD4592) proposed that the land at Ferryboat Lane be included as part of the employment allocation for PEA1.
 - Siglion (PD3005) said the policy did not place enough emphasis on the benefits of Mixed Use development.

How Issues Have Been Taken into account prior to Submission

- 9.7 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledges the National Grid support for the policy.
- 9.8 In response to Prestige Car Direct Property Services, although the Council has identified a tight supply of available employment land, it is not considered necessary to designate additional land at Ferryboat Lane.
- 9.9 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.

Duty to Cooperate (SD11)

- 9.10 The Council consulted with neighbouring authorities as part of the stakeholder workshop undertaken as part of the Employment Land Review. Additionally, the Council amended proposed employment allocation boundaries in order to take out areas falling within Flood Zones 2 and 3. This was to address representations raised by the Environment Agency.

Sustainability Appraisal (2017)

9.11 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

9.12 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD6)

9.13 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	-	++	+	~	~	++	~	~	~	+	+	~	~	~

9.14 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

9.15 As set out within the justification for Policy SP1, the Council's ELR (2016) (SD.37) identified a need for between 95 and 115 hectares of employment land over the plan period from 2015 to 2033 (para 9.15: pg108). Policy SP1 therefore requires a supply of at least 95 hectares of general employment land is provided to meet these identified needs.

9.16 In order to provide a sufficient supply of employment land within the city to meet identified needs, the Council has proposed a two-tier allocation for general employment sites, comprising of Primary Employment Sites (PSAs) and Key Employment Areas (KEAs). Primary Employment Areas (PEAs) are sites which are considered essential to the economic long-term success of the city. These are distinct from Key Employment Areas and other employment sites³²¹, with PEAs being located in the strongest demand areas and often feature the most modern business premises. As a consequence, it is imperative these sites are protected from non-employment use which could impact upon their viability as employment locations.

9.17 In terms of maintaining a sufficient supply of employment land) the ELR (SD.37) identified 130.86 ha (2016: pg 91)³²². It also recommended the deallocation of a number of employment sites (2016: pg 94-105) which were originally identified within the UDP (1998) and the UDP Alteration No.2. The Council has accepted the vast majority of the proposed deallocations, with the exception of Land West of Luxembourg Road³²³. These sites are set out in Tables 26, 27 and 28 below^{324 325}.

³²¹ Key Employment Areas are set out in CSDP Policy EG2: Key Employment Areas. CSDP Policy EG3: Other employment sites.

³²² The 130.86 ha was identified prior to recommending deletions.

³²³ Whilst the ELR (para 8.31: pg97) recognises that this site is currently landlocked, the adjacent use is used as a temporary parking area for emergency vehicles, so the site may become accessible in the future. Consequently, the Council have maintained this as available supply.

³²⁴ The ELR (2016, pg 94 to 103) sets out justification for site de-allocation.

³²⁵ The ELR did not find any available opportunities to deallocate land at North Sunderland.

Table 26 Employment Land Review Recommended Release Sites in Washington

Area	Site	Net Site Area lost (ha)
Washington	Former Armstrong House	0.89
Washington	Silverstone Road, Sulgate	0.49

Table 27 Employment Land Review Recommended Release Sites South Sunderland – With the Exception of West of Luxemburg Road

Area	Site	Net Site Area lost (ha)
South Sunderland	West of Petrol Filling Station, Pallion New Road	0.24
South Sunderland	Lisburn Terrace adjoining Former Corning Site	0.60
South Sunderland	Sea View/ Stockton Road	16.37

Table 28 Employment Land Review Recommended Release Sites Coalfield

Area	Site	Net Site Area lost (ha)
Coalfield	Market Place, Allotments (3)	0.53
Coalfield	Market Place, Northern Extension (1)	1.41
Coalfield	Philadelphia, North of Gatehouse	0.77
Coalfield	Philadelphia, South of Gatehouse	0.94
Coalfield	New Lambton, East of Main Waste Transfer Station	2.34
Coalfield	New Lambton, Former Main Waste Transfer Station	0.56
Coalfield	New Lambton, Small Scrap Yard	0.13
Coalfield	New Lambton, East of TKTCosyfoam	0.50

9.18 In addition to the proposed deallocations (above), the ELR (SD.37) also identified a number of sites which were recommended for further consideration for alternative uses (see ELR 2016 pg 95-105). After consideration of each of these in turn, the Council recommended the following sites for deallocation for the following reasons:

Table 29 Employment Site Land Review Recommended Release Sites Coalfield

Site	Justification	Net Site Area lost (ha)
Sunderland Enterprise Park East	Narrow site physically detached from adjacent employment area. Access difficult.	0.60
Majority of The Disused Hendon Railway Sidings, Moor Terrace³²⁶	The site has been identified as a Local Wildlife Site and is no longer available for development.	4.22
East of Cherry Way (1), Dubmire (part)	The site forms an extension to the existing industrial estate. Following consultation representations from the Environment Agency, the site area has been reduced, to remove the parcels of land which fall within Flood Zones 2 and 3.	0.08
Sheepfolds	Mixed use site. ELR identifies 1.5ha for offices, as shown on masterplan at the time. However, office component significantly reduced as part of latest masterplan.	1.5
Lisburn Triangle	Mixed use site identified for retention through the ELR. However, office use no longer being promoted and more likely to be redeveloped for residential use consistent with adjacent development.	1.0
Farrington Row, Area A	Site identified for mixed use. Site is owned by Ministry of Justice and was originally earmarked for courthouse/office use. However, site is now surplus to requirements and	1.39

³²⁶ Please note that the site area shown has been adjusted from that identified in the ELR to reflect that approximately 0.5ha of this site is included as an employment allocation.

	likely to be disposed of for alternative use.	
East End	Three sites identified for mixed use. The area is characterised by a wide diversity of uses. Sites were originally identified for office use, however the allocation of the Vaux for office-led mixed use is likely to make alternative uses more desirable/appropriate.	0.83
Farringdon	Two Council owned sites identified for commercial mixed use. The ELR identifies that office demand is weak in these areas. Council is prioritising the Vaux for new office development.	1.25

9.19 In addition to the above, there are several sites which were identified for retention through the ELR (SD.37) but have been removed from the supply of available employment land for the following reasons:

Table 30 Additional Employment Sites Removed

Site	Justification	Net Site Area lost (ha)
North of Campanile Hotel, Emerson, Washington	Site is small, overgrown and contains a large pylon which occupies the bulk of the site. Adjacent uses now in non B use classes.	0.39
North of Blackthorn Way (1), Sedgelych	Site has been lost to residential use.	4.56

September 2018 - Employment Land Available Supply Update

9.20 In September 2018, the Council undertook an updated assessment of all designated employment sites. This explored the take up on designated areas and an update on available employment land supply. Table 31 below identifies identified take up.

Table 31 Identified Take Up on Primary Employment Areas and Key Employment Areas (2016-2018)

Site	Description	Net Site Area lost (ha)
Hillthorn Farm, Washington	New development of B8 use has reduced supply of available land (vantec).	6.51
Turbine Business Park (3) west of Vantec, Washington	New development of B8 use with ancillary office (vantec).	1.37 ³²⁷
Former I J Dewhirst (6), Hendon	New development of scrapyard on site.	1.47
West of Azure Court Camberwell Way	Change of use to temporary car park (up to 6 years).	1.04
South East corner of Pennywell Industrial Estate	Erection of a public house and restaurant.	1.51
Crown Road (West of Quay West) (5)	Erection of new office and car valet area.	0.41
North Hylton Enterprise Park (5)	Site being utilised as car storage area.	0.34
North of Cygnet Way (4)	Site is being utilised as car park.	1.71
Land east of Parkgate (2)	The site is being used as caravan parking	0.19
Trafford Road	Site being used as a car park	0.24
Total		14.79

³²⁷ A residual part of the site is still available.

9.21 In addition to the above three other sites which were included in the ELR (SD.37) were considered currently inaccessible and consequently do not currently feature as available employment land. The update has identified 92.85 ha of available employment land. The broad location of this supply is set out in Table 32.

Table 32 Total Available Employment Land Supply (Sub Area) (All Sources)

Sub Area	Net Site (ha)
Washington	39.59
Sunderland North	5.16
Sunderland South	29.41
Coalfield	18.69
Total	92.85

9.22 Table 33 sets out exclusively available employment land purely on Primary Employment Areas. In total, sites classified as Primary Employment Areas make up 52 percent of the total available employment land portfolio, which equates to 48.42 ha.

Table 33 Primary Employment Areas – Available Sites

Designation	Site	Net Site (ha)
PEA2: Rainton Bridge North	Land to West of Former Sumitomo Factory (1)	2.36
PEA2: Rainton Bridge North	Gilpin Wood (Former Glebe Farm Sewage Works (6))	2.35
PEA13: Rainton Bridge South	North of Gadwell Road (1)	0.51
PEA13: Rainton Bridge South	South of Cyget Way (5)	5.72
PEA9: Turbine	Turbine Business Park 3 - East of Pub	1.22
PEA9: Turbine	Turbine Business Park 3 - East of Spire Road	0.19
PEA9: Turbine	Turbine Business Park 3 - South of WBC	0.84
PEA9: Turbine	Turbine Business Park 3 - South East of FTC	0.81
PEA9: Turbine	Turbine Business Park 3 West of Vantec	0.54
PEA9: Turbine	Turbine Business Park 3 South of Test Track	2.56
PEA9: Turbine	Turbine Business Park (Nissan)	4.29
PEA: Nissan	Hilthorn Farm (7)	2.29
PEA: Hillthorn	Hilthorn Farm (6) ³²⁸	12.81
PEA3: Glover	Tower Road (2)	0.24
PEA6: Stephenson	Former Northumbria Centre (1)	0.65
PEA6: Stephenson	East of Stephenson Road (2)	0.97
PEA6: Stephenson	East of Stephenson Road (3)	0.35
PEA7: Wear	South of Sedling Road	0.53
PEA7 Wear	North of Hankyu	0.94
PEA5 Pattinson South	North of Sterling Close	0.55
PEA5 Pattinson South	West of Sterling Close	0.23
PEA5 Pattinson South	Holystone Waste	0.84
PEA4 Pattinson North	Front James Steel	0.63
PEA4 Pattinson North	James Steel Site 1	0.62
PEA4 Pattinson North	West of Walton Road	0.64
PEA4 Pattinson North	South of Faraday Close	0.87
PEA4 Pattinson North	Screen Print North of Alston Rd	1.69
PEA4 Pattinson North	North of Low Barnston Farmhouse	2.18
Total		48.42

³²⁸ Application 15/00039/FU4. This has been implemented (Vantec). This takes up a part of the site and boundary amendments necessary. The D and A makes this out to be 23 acres = 9.30 . (see section site context).

- 9.23 Whilst the total of 92.85 ha falls below the lower end need requirement of 95 ha of available employment land identified in the ELR, it is recognised that the first 3 years of the plan period have now been completed and that there would have been expected to have been some completions during this period. If the 95 ha was split evenly across the 18 year plan period, that would equate to approximately 5.28 ha³²⁹ of employment land being developed per annum. On this basis it would reduce employment land requirements to approximately 79 ha by 2018. The employment land requirement was based on a range of 95 ha to 115 ha (ELR, para 7.117 pg 90) (SD.37³³⁰). With regards to the top of the range, if the 115 ha was split event evenly across the 18 year period this would equate to 6.38 ha of employment land annually³³¹, over the three years this would result in projected take up of 19.16 ha³³². On this basis it would reduce employment land requirements to 95.84³³³ and thus available employment land supply would fall short of requirements.
- 9.24 Taking both ranges into account, the Council considers that the supply of employment land is becoming particularly tight and therefore there is a need to safeguard the remaining supply of employment land against any future losses to alternative uses.
- 9.25 In terms of the spatial distribution of employment land, the ELR (SD.37) sought to identify the likely demand within each of the sub-areas and consider the supply of land available in each of these areas (see ELR 2016 Table 8.3 pg. 93) (SD.37). The study recognised that the strongest market demand for employment land in recent years has been in the Washington sub-area and this was likely to continue within the plan period. However, the supply of employment land within the Washington sub-area (excluding the IAMP) would not be sufficient to meet identified needs. In order to address this localised demand, through the consultation on the draft Core Strategy and Development Plan, the Council requested that potential sites were put forward for additional employment allocations. However, the only site that was put forward was a small site at Glebe House Farm and a small parcel of land adjacent to the proposed Washington Meadows site, adjacent to the Hillthorn Farm Primary Employment Area.
- 9.26 With regard to the suggested allocations, the site at Glebe House Farm was considered, however due to its small size, location in relative close proximity to some residential units and amendments to the Green Belt in this location which were not justified through the Council's Green Belt boundary review process, it was not considered appropriate to include this area as an employment allocation. The site suggested for allocation adjacent to Hillthorn Farm is already allocated employment land identified through the UDP and will continue to be safeguarded through the CSDP.
- 9.27 Furthermore, whilst the ELR (SD.37) seeks to identify the need for general employment land in addition to the IAMP, taking account of its potential impacts, it is recognised that the IAMP AAP allocates 150 ha for principal uses (as defined in Policy S1 of the AAP) within the Washington area. However, it is recognised that the potential impacts of the IAMP are not fully known at this point in time, including potential displacement effects. These will become clearer as the site is developed. It is therefore considered that this site in addition to the areas of land safeguarded for employment use through Policies EG1 and EG2 of the CSDP will ensure an appropriate supply of employment land within Washington is retained.

³²⁹ 95 ha over an 18 year plan period (2015 to 2033) $95/18 = 5.28$ ha

³³⁰ [https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_\(2016\).pdf?m=636802955306300000](https://www.sunderland.gov.uk/media/20880/SD-37-Sunderland-Employment-Land-Review-2016-pdf/SD.37_Sunderland_Employment_Land_Review_(2016).pdf?m=636802955306300000)

³³¹ 115 ha over an 18 year plan period (2015 to 2033) $115/18 = 6.38.8$ ha.

³³² $6.38.8 \times 3 = 19.16$ ha.

³³³ $115 - 95.84 = 95.84$ ha.

9.28 The ELR (SD.37) also identified an oversupply of employment land within the Sunderland South sub-area when measured against likely demand for the sub area. In order to address this, the Council has identified a number of areas of allocated employment land within this sub-area which could be deallocated, including a large site to the south of Ryhope, which now forms part of the South Sunderland Growth Area. However, due to the tight balance across Sunderland between the remaining supply and need for employment land throughout the city over the remainder of the plan period, it would not be appropriate to allow the loss of further employment land within this area at this point in time, to ensure that an adequate supply of employment land is retained for the remainder of the plan period.

9.29 In addition, whilst it is recognised that the ELR (SD.37) identifies the Sunderland South sub-area as being an area of weaker demand, this is based on completions over recent years. Following the completion of the Northern Spire Bridge as other investments in infrastructure in Sunderland South a number of employment sites in South Sunderland will become much more accessible to the strategic road network improving their marketability for employment uses.

9.30 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. When assessing exceptional circumstances each will be treated on its own merits with careful consideration given to the recommendations of the most up-to-date employment land review. Figure 37 shows the distribution of Primary Employment Areas within the city across the city.

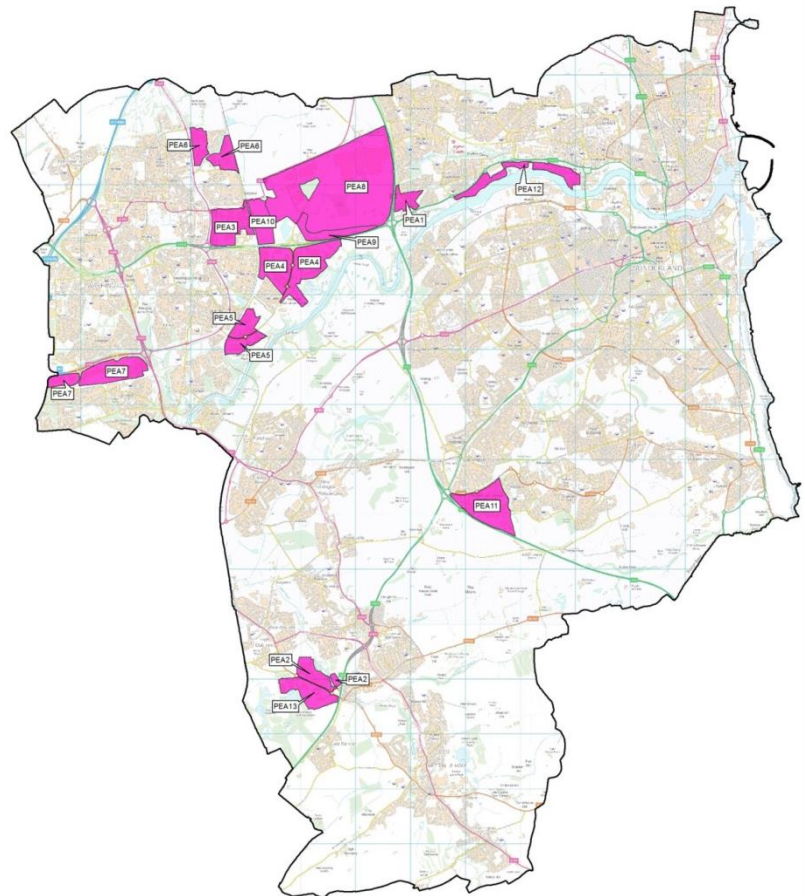


Figure 37 Primary employment Areas

Reasonable Alternatives

Primary Employment Areas, Key Employment Areas and reasonable alternatives have been assessed as part of the SA. Further details are provided within Appendix F of the SA.

Effective

Deliverable

9.31 The policy will be delivered through the submission and determination of planning applications. The supply of employment land will be carefully monitored through the Annual Monitoring Report (AMR) to ensure that there remains a sufficient supply of employment land within the city.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG1	Primary Employment Areas	To identify and protect the Primary Employment Areas of the City	<ul style="list-style-type: none"> Limited progress and delivery of Primary Employment Areas Significant development of allocated PEA sites for non-B1/B2/B8 uses Significant number of ancillary uses permitted over 50sqm Significant increase in applications granted for B1/B2/B8 use outside of identified Employment Areas 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Identification of reasons for under-delivery Review the provision of land for B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> PEA land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses PEA land (ha) and floorspace (sqm) lost to development for non-B Class uses Available PEA land (ha) Number of non-B Class ancillary units >50sqm permitted and built on PEA land 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

Consistent with National Policy

9.32 The policy is consistent with Paragraph 21 of the NPPF by setting criteria and identifying sites for local and inward investment to match the strategy and to meet identified needs over the plan period

EG2 Key Employment Areas

9.33 Key employment areas are those which are recognised as older and less effective relative to Primary employment areas (set out in Policy EG1). In order to meet employment needs and plan positively for Sunderland’s economic development a portfolio of sites have been classified as Key employment areas. These are distinctive from Primary employment areas as

they allow the flexibility for redevelopment to non B use when criteria set out within the policy are met.

EG2 Key Employment Areas

1. The following are allocated as Key Employment Areas (as designated on the Policies Map) and will be safeguarded for B1 (Business – excluding B1a), B2 (General Industrial) and B8 (Storage and Distribution) employment uses:
 - i. Hendon (KEA1);
 - ii. Leechmere (KEA2);
 - iii. Pennywell (KEA3);
 - iv. Pallion (KEA4);
 - v. Pallion Shipyard (KEA5);
 - vi. Deptford (KEA6);
 - vii. Low Southwick (KEA7);
 - viii. North Hylton Road (KEA8);
 - ix. Armstrong (KEA9);
 - x. Crowther (KEA10);
 - xi. Hertburn (KEA11);
 - xii. Parsons (KEA12);
 - xiii. Swan (KEA13);
 - xiv. New Herrington (KEA14);
 - xv. Dubmire (KEA15);
 - xvi. Houghton Market Place (KEA16); and
 - xvii. Hetton Lyons East (KEA17).
2. The release of vacant land or premises within Key Employment Areas to uses outside the B Use Classes will only be considered acceptable where it can be demonstrated that:
 - i. the council's current Employment Land Review recommends its release for another purpose, or it can be demonstrated to the council's satisfaction that a site is no longer needed or capable of accommodating B Use Class employment uses;
 - ii. the integrity, function and operation of the remaining Key Employment Area for employment purposes is not adversely affected;
 - iii. the site is of an insufficient quality and/or suitability to accommodate existing types of industrial demand; and
 - iv. the site has been unused for employment uses for at least 24 months, despite having been properly marketed on reasonable terms.

Positively Prepared

Vision and Strategic Priorities

9.34 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing.

9.35 Policy EG2 will deliver strategic priorities 1, 2 and 5.

Draft Plan Comments

- 9.36 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:
- Cowie Estates raised concerns regarding the designation of their land as they currently have an application for mixed use. The Developer requests the Plan is more flexible and designates the site for mixed use. Developers also object to the inclusion of the Hendon Paper Mill and requests the site is not designated. North East Property Partnership objects to the inclusion of KEA3.

- Sunderland Civic Society highlighted that the policy does not state what alternative uses could be. The Society requests that the Plan identifies industrial sites where retail development would be favoured.
- Siglion requests are more flexible approach and to identify these site for mixed use development.
- Persimmon welcomes the policy and its flexibility.
- Town End Farm Partnership request the IAMP is designated in this policy.

How Issues Have Been Taken into Account at Publication Draft

9.37 In response to the comments raised:

- The ELR (SD.37) identifies that the overall quantum of available employment land within the city is at the bottom end of the range of identified needs. The Council therefore considers it necessary for these sites to be retained as Key Employment Areas. The Council's evidence base has been updated which demonstrates the need to retain the Cowies and Hendon Paper Mill sites for employment use to ensure an adequate supply of employment land within the city over the plan period. However, as a Key Employment site, Policy EG2 will support the development of suitable alternative uses 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 Council feels that this will provide sufficient flexibility should it become clear that the land is no longer required to meet employment needs in the future.
- In regards to the Pennywell site, the wording of the policy has been amended to provide greater clarity, however it is not considered reasonable to substantially change the proposed approach set out within the policy.
- In response to the Civic Society and Siglion comments, the Plan 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 Plan has not been updated to include IAMP in the Policy as it will be delivered through the IAMP AAP which establishes a policy framework for its development.
- The Plan has been amended to state that alternative uses will be supported where there are no reasonable prospects of the site coming forward for employment uses (B use classes).

Publication Draft Comments

As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Various representations set out requests for sites to be removed from employment land allocations, these were; Deptford site, (see PD240), Hendon Paper Mill Site (PD2842 & PD4061) and Emily's Nursery (PD4223).
- Sunderland Civic Society (PD824) was concerned with the open-ended nature of policy EG2.2 and the possible opportunity for retail uses to locate on key employment areas. Friends of Sunderland Green Belt (PD3020) state that there is an excess of employment areas in Sunderland and these areas would be better for housing, without using green field or Green Belt.
- Siglion (PD2886) set out Town End Farm and Hetton Lyons South have been omitted from list of areas to be safeguarded for employment uses and request more flexibility so that mixed use with residential is also appropriate.
- North East Property Partnership (PD4509) are concerned that the policy is too restrictive. Concerned that criteria in Part 2 of policy are necessarily burdensome requiring two years marketing would not enable land agent to be fleet of foot. That marketing should be limited to 6 months and should be able to be commenced ahead of a property becoming

vacant. Also, citations 2i to 2iv should be recast so that non b class development will be accepted where any one of the citations are met.

How Issues Have Been Taken into account prior to Submission

- 9.38 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.
- 9.39 In response to the requests to remove various sites from their employment land designation, The Council considers the overall supply of available employment land to be particularly tight relative to projected employment land needs. It is therefore considered necessary for sites to be retained as employment land. 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.
- 9.40 The proposed changes set out in the response from the North East Property Partnership, are not considered acceptable. Key employment areas are important to ensuring a sufficient supply of sites to support employment land. 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. Additionally, the Council deems a 24 month period for marketing to be reasonable terms. This is justified in the context of a tight supply of available employment sites.
- 9.41 In response to Friends of Sunderland Green Belt, the city has a particular tight balance between available employment land supply and projected employment needs. Consequently, there is a justified need to retain employment land over the plan period. 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 designate sites at Town End Farm or Hetton Lyons South.
- 9.42 In response to the Civic Society, the policy seeks to safeguard key employment areas for employment uses as this is necessary to meet employment need. Alternative uses would be assessed on their own merits. Any retail development would be required to be in accordance with the sequential test.

Duty to Cooperate (SD11)

- 9.43 No duty to cooperate issues have been identified.

Sustainability Appraisal (2017)

- 9.44 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

- 9.45 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD6)

- 9.46 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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9.47 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

9.48 Key Employment Areas (KEAs) are recognised as employment areas which are required to meet employment needs. They are distinct from Primary Employment Areas as they are located in relatively weaker areas of demand and are recognised as older and less effective employment sites. As a consequence, the policy has been designed to offer greater flexibility, offering the opportunity for release to alternative uses where it can be demonstrated that they are no longer required to meet employment needs and where the proposed alternative development would be acceptable and would not adversely impact upon the integrity and function of the remaining employment area.

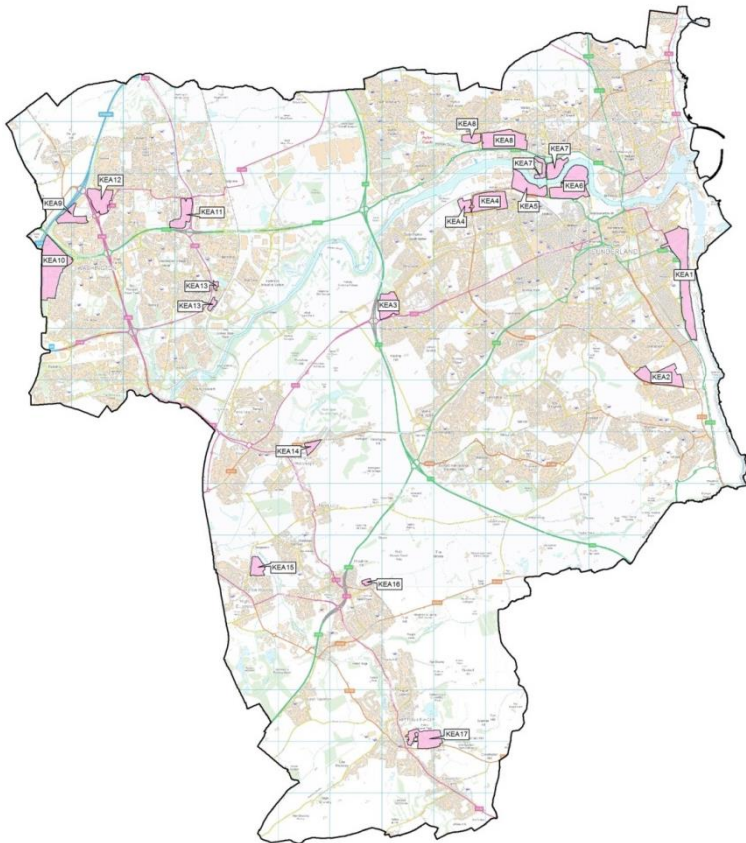
9.49 As noted in the justification to Policies SP1 and EG1, the Council considers the overall quantum of available employment land to be particularly tight and at the bottom end of the range of identified need consequently, there is a need to retain key employment areas for business and general industrial use. Also noted in the justification to Policy EG1, is the September 2018 update of available employment land. This identified 92.85 ha of available land within Primary Employment Areas, Key Employment Areas, general employment sites at the port and the permitted former Biffa site at Houghton. This identifies that KEAs, including general employment land at the port and non-designated sites make up 48 percent of the available land portfolio. As noted in Table 34, this equates to 44.43 ha of available employment land.

Table 34 Key Employment Areas – Available Sites

Designation	Site	Net Site (ha)
KEA7 Low Southwick	Wear Street (Land beside Q A Bridge)	0.18
KEA7 Low Southwick	Wear Street/ Camden Street (1)	0.10
KEA7 Low Southwick	Crown Road (East of Quay West) (4)	0.13
KEA8: North Hylton Road	Phoenix Tower Business Park Site	4.13
KEA8: North Hylton Road	West of Castle Town Road	0.62
KEA15: Dubmire	East of Cherry Way (1)	2.19
KEA15: Dubmire	West of Cherry Way (4)	0.79
KEA15: Dubmire	South of Techniks	0.16
KEA17: Hetton Lyons East	Adjoining Ready Care Site	0.16
KEA17: Hetton Lyons East	North of Colliery Lane (4)	0.37
KEA1: Hendon	Commercial Road	2.61
KEA1: Hendon	Paper Mill	7.50
KEA1: Hendon	Geometers	2.19
KEA1: Hendon	East of Gasometers	1.9
KEA2: Leechmere	South West of Carmere Road	0.13
KEA2: Leechmere	North of Plumb Centre	0.29
KEA4 Pallion	West of Eastern Way (9)	0.31
KEA4 Pallion	Former Vishay Factory Pallion Way (8)	0.98
KEA5: Pallion Shipyard	North of Woodbine Terrace (1)	1.73
KEA5: Pallion Shipyard	East of Woodbine Terrace (3)	0.71
KEA6: Deptford	Former Corning Warehouse Deptford Terrace	6.02
KEA11 Hertburn	North entrance to industrial park	0.21

KEA10 Crowther	North of Crowther Road (3)	0.90
KEA10 Crowther	East of Crowther Road (1)	0.34
KEA9 Armstrong	Land at Armstrong Road	0.66
Port	Barrack Street	0.60
Port	Prospect Road (2)	3.94
Port	Disused Hendon Railway Sidings	0.5
	Biffa	4.08
Total		44.43

9.50 During the consultation (as noted above in draft plan comments section) several representations were made seeking to use other non B use on key employment areas. This relates to the following sites; 1. Emily's Nursery (KEA2: Leechmere) 2. Papermill, (KEA2: Hendon), 3. Pallion Industrial Estate (KEA3: Pennywell), 4. Pallion Industrial Estate (KEA5: Pallion Shipyard) and 5. Deptford (KEA6: Deptford). As noted earlier, due to the tight balance between overall demand and supply it is not considered appropriate to release any of the sites identified above or allow redevelopment to non B use class unless part two of the policy is satisfied.



9.51 It should be noted that all sites put forward are located in South Sunderland and representations have brought up the issue of a perceived 'oversupply' of employment land in this part of the City. This perceived oversupply is based exclusively on past take up. It should be noted however, that South Sunderland forms part of a wider market area with Sunderland North (see ELR 2016, pg 60) (SP.37). As Sunderland North has an identified undersupply (see ELR 2016 pg 93) (SP.37) over the plan period, it is considered sites in Sunderland South are needed to help meet the needs of Sunderland North as well as the whole Plan area as a whole including Washington area which has a significant undersupply. South Sunderland's synergy with the rest of the city and its ability to function as a suitable area for

Figure 38 Key Employment Areas

employment development will be enhanced by the recent delivery of key infrastructure. Following the completion of the Northern Spire Bridge as other investments in infrastructure in Sunderland South a number of employment sites in South Sunderland will become much more accessible to the strategic road network improving their marketability for employment uses. Therefore key employment areas will be retained.

9.52 It is important that all four components of part two are satisfactory met to release vacant land. It is important that the release of employment land is a particular high test, especially in the context of the tight balance between employment demand and supply. Each part of the tests are set out below and justification given:

- *Employment Land Review recommends its release, or it can be demonstrated that a site is no longer needed* – as employment land is a limited resource and is needed to meet for the future prosperity of the city it will need to be proven to the Council that the site is no longer required through a demonstration that the site is no longer needed. This is especially important as the erosion of employment land when not coordinated in a sustainable manner could constrain the economic development of Sunderland as a whole.
- *The integrity, function and operation of the remaining Key Employment Area for employment purposes is not adversely affected* – introducing non b uses to employment sites, could potentially lead (when not developed sensitively) to the erosion of the integrity, function and operation of the employment site as a whole. Therefore, it is justified to expect development proposals to consider this point.
- *The site is of an insufficient quality and/or suitability to accommodate existing types of industrial demand* – this is required in order to check the quality of site and that it could not contribute to meeting industrial needs.
- *The site has been unused for employment uses for at least 24 months, despite having been properly marketed on 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 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. This is considered to be an appropriate time period to incentivise land owners to maintain the site for employment activity and reduce the risk of the site being developed for other often higher value activities such as retail, housing or mixed use. The 24 month period thus helps to ensure developers/land owner priorities for sites are aligned to utilising the space for its intended purpose, industrial occupation. A shorter marketing period (e.g. 6 to 12 months) is not considered to offer sufficient time to ensure that it is no longer required for employment use. Paragraph 22 of the NPPF seeks to ensure that planning policies avoid the long-term protection of employment land where there is no reasonable prospect of it being needed for that purpose. It is not considered that a requirement for 24 months of marketing would represent the 'long-term' protection of employment land, especially given the context of a tight supply of employment land within the city against identified needs.

9.53 As demonstrated above, the policy has struck an appropriate balance between making sure the Council retains sufficient appropriate sites to meet employment needs and ensure flexibility to avoid the long term protection of sites allocated for employment use as set out in NPPF policy (paragraph 22).

Reasonable Alternatives

- 9.54 Primary Employment Areas, Key Employment Areas and reasonable alternatives have been assessed as part of the SA. Further details are provided within Appendix F of the SA (SD.5).
- 9.55 Provide More Employment Land at Washington – As noted in the ELR (SP.37), Washington is considered the part of the city where demand for employment premises is stronger. Therefore a reasonable alternative could have been to provide more employment land at Washington. However, the Council identified this as an issue within the Draft CSDP in 2017 and requested that additional sites were put forward. No additional land was put forward for employment use, which together with the tightly defined Green Belt boundaries at Washington, would make it difficult to identify additional employment sites at Washington.

Effective Deliverable

9.56 The policy will be delivered through the submission and determination of planning applications. The supply of employment land will be carefully monitored through the Authority Monitoring Report (AMR) to ensure that there remains a sufficient supply of employment land within the city.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG2	Key Employment Areas	To identify the Key Employment Areas and set out when alternative uses would be considered acceptable	<ul style="list-style-type: none"> Limited progress and delivery of Key Employment Areas Significant development of allocated KEA sites for non-B1/B2/B8 uses Significant increase in applications granted for B1/B2/B8 use outside of identified Employment Areas 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Identification of reasons for under-delivery Review the provision of land for B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> KEA land (ha) and floorspace (sqm) developed for B1, B2 and B8 uses KEA land (ha) and floorspace (sqm) lost to development for non-B Class uses KEA land lost to non-B Class uses contrary to policy Available KEA land (ha) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

Consistent with National Policy

9.57 The policy is consistent with Paragraph 21 of the NPPF by setting criteria and identifying sites for local and inward investment to match the strategy and to meet identified needs over the plan period. The policy is also consistent with Paragraph 22 of the NPPF as it seeks to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for the allocated employment use.

EG3 Other Employment Sites

9.58 There is a number of existing employment sites which are not designated. The purpose of this policy is to set out criteria which relates to these sites. The policy seeks to seek a balance between supporting business activity and allowing sites to be reused for alternative forms of development in alignment with the criteria set out in the policy.

EG3 Other Employment Sites

For non-designated employment sites, development will be supported for:

1. new employment uses or extensions to existing employment uses; and
2. the change of use or redevelopment of land or premises that are presently in employment uses if there are regeneration benefits or there is no reasonable prospect of the land being used for employment uses, and the development is considered to be acceptable.

Positively Prepared

Vision and Strategic Priorities

9.59 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing.

9.60 Policy SP1 will help to deliver Strategic Priorities 2 and 5.

Draft Plan Comments

9.61 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation;

- Persimmon requested that the Plan is amended to ensure that employment land that has no reasonable prospects of development for employment uses is not unnecessarily protected.

How Issues Have Been Taken into Account at Publication Draft

9.62 The Plan has been amended to state that alternative uses will be supported where there are no reasonable prospects of the site coming forward for employment uses.

Publication Draft Comments

As set out in the Consultation Statement (SD.7), no key issues were raised against policy EG3.

How Issues Have Been Taken into account prior to Submission

As set out in the Consultation Statement (SD.7), no key issues were raised against policy EG3.

Duty to Cooperate (SD11)

9.63 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

9.64 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
Blue	Orange	Green	Light Green	Blue	Blue	Green	?	Blue	Blue	Light Green	Light Green	Blue	Blue	Blue

9.65 The SA made the following recommendation for changes to be made to the Draft Plan.

9.66 Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA8: Land Use and	To minimise duplication between	Some minor amendments to

Soils	<p>policies, in the next iteration of the emerging Sunderland CSDP it is recommended that policy WM1 – Waste Management should be recast to focus on strategic criteria, including setting out a clear waste hierarchy, identifying waste management capacity requirements, establishing the need for development and directing proposals to preferred locations. Policy WM2 – Waste Facilities should be dedicated to assessing all waste management development proposals against design, environmental and amenity criteria.</p>	<p>policies have been made. Plan now makes it clear which policies are considered to be strategic and which are local. No further changes considered necessary.</p>
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Sustainability Appraisal (2018) (SD6)

9.67 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	-	++	+	~	~	++	+	~	~	+	+	~	~	~

9.68 The SA made no recommendations for changes to be made to the Publication Draft:

Justified

9.69 Whilst the Primary and Key Employment Areas form the majority of employment sites within the city, there are also a number of other existing small employment sites. These tend to be older, less marketable employment sites close to, or within residential areas, where proposals for other uses – more likely to be residential – could give rise to regeneration benefits. The policy seeks to support employment uses on these non-designated sites, however it also offers flexibility for the sites to be reused for alternative forms of development if there are regeneration benefits, no reasonable prospect of the land being used for employment uses and the development is considered to be acceptable.

9.70 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

Reasonable Alternatives

9.71 Resisting the development of non B use development on non-designated sites – This is considered to be overly constraining which will not allow for sustainable development opportunities and regeneration benefits to come forward. In the context of non-designated sites being considered to be older, less marketable employment sites close to, or within residential areas it is not considered appropriate to restrict development opportunities for non b use.

Effective

Deliverable

9.72 The policy will be delivered through the submission and determination of planning applications

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG3	Other employment sites	To set out when development of non-KEA employment land will be considered acceptable	<ul style="list-style-type: none"> Significant loss of non-designated employment land to alternative uses 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Review the provision of land for B1, B2 and B8 uses in the Plan period Update the employment land evidence base Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Other employment land (ha) and floorspace (sqm) for B1, B2 and B8 uses 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

Consistent with National Policy

9.73 The policy is consistent with Paragraph 21 of the NPPF by setting criteria and identifying sites for local and inward investment to match the strategy and to meet identified needs over the plan period. The policy is also consistent with Paragraph 22 of the NPPF as it seeks to avoid the long term protection of sites for employment use where there is no reasonable prospect of a site being used for employment use.

EG4 New Employment Areas

9.74 This policy sets out criteria for new employment development outside of designated employment areas. Whilst established employment areas will be the most appropriate location for businesses, it is acknowledged that in order to maximise opportunities to grow the local economy and be responsive to changing market conditions there may be occasions where a certain use requires a location outside of these areas.

EG4 New Employment Areas

Development for new employment uses (B1 – (excluding B1a), B2 and B8 uses) outside of designated employment areas must demonstrate that the proposed use:

- cannot be accommodated within the designated employment areas;
- can be provided with appropriate vehicular access; and
- would not be detrimental to local amenity.

**Positively Prepared
Vision and Strategic Priorities**

9.75 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing.

9.76 Policy EG4 will deliver the following strategic priorities 1, 2 and 5.

Draft Plan Comments

9.77 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Highways England supports this policy.

How Issues Have Been Taken into Account at Publication Draft

9.78 No issues raised which require further amendments to this policy.

Publication Draft Comments

9.79 As set out in the Consultation Statement (SD07), no key issues were raised against policy EG4.

How Issues Have Been Taken into account prior to Submission

9.80 As set out in the Consultation Statement (SD07), no key issues were raised against policy EG4.

Duty to Cooperate (SD11)

9.81 No duty to cooperate issues identified.

Sustainability Appraisal (2017)

9.82 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
							?							

9.83 The SA made the following recommendation for changes to be made to the Draft Plan.

9.84 Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA8: Land Use and Soils	To improve clarity and policy effectiveness, in the next iteration of the emerging CSDP it is recommended that policies EP4 – Other Employment Areas and EP5 – New Employment Areas should be combined into a single policy. This should provide support for new employment uses or	Policies are to deal with different forms of development (i.e. existing employment sites and proposed new employment sites), therefore it is not considered appropriate to merge. Policy has been amended to change reference to 'development which is considered acceptable', which will be assessed

	<p>extensions out with PEA and KEA where a) the proposal would contribute to significant regeneration or where a need for the development at the proposed location can be demonstrated and b) no unacceptable adverse impacts would occur, including on access and amenity. In addition, the term "acceptable development" in Policy EP4 should be defined within the rationalised policy.</p>	<p>on a site by site basis.</p>
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Sustainability Appraisal (2018) (SD6)

9.85 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	-	++	+	~	~	++	+	~	~	+	+	~	~	~

9.86 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

9.87 Whilst the city's established employment areas will be the most appropriate location for businesses, it is acknowledged that in order to maximise opportunities for economic growth and to be responsive to changing market conditions, there may be occasions where a certain use requires a location outside of these areas. The policy seeks to provide this flexibility, whilst continuing to prioritise new employment uses to allocated sites, where possible.

Reasonable Alternatives

9.88 Merge policies EG3 and EG4 as outlined in the Sustainability Appraisal - however, (as noted above) the policies both deal with different forms of development and therefore it is not considered appropriate to merge.

Effective

Deliverable

9.89 The policy will be delivered through the submission and determination of planning applications.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG4	New employment areas	Support for new employment uses outside of allocated areas where	<ul style="list-style-type: none"> Significant development of new employment uses outside of designated 	<ul style="list-style-type: none"> Review land allocations identified in the Local Plan Review the 	<ul style="list-style-type: none"> New employment land (ha) and floorspace (sqm) permitted 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Employment Land Review

		appropriate	employment areas	provision of land for B1, B2 and B8 uses in the Plan period <ul style="list-style-type: none"> • Update the employment land evidence base • Potential review of the Plan/Policy 	for B1, B2 and B8 uses outside of designated employment areas	
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Consistent with National Policy

9.90 The policy is consistent with Paragraph 21 of the NPPF by setting criteria and identifying sites for local and inward investment to match the strategy and to meet identified needs over the plan period. The policy provides flexibility to meet changing demands for economic growth.

EG5 Offices

9.91 Policy EG5 recognises a number of employment areas to be prioritised for office led developments; the Vaux site (SS1), the designated centres and the primary employment areas at; Doxford International, Hylton Riverside and Rainton Bridge South as priority sites for office led development.

EG5 Offices

Development for offices (Use Class B1a) should be prioritised within the following locations:

1. The Vaux strategic site allocation (Policy SS1);
2. Primary Employment Areas at Doxford International, Hylton Riverside and Rainton Bridge South (PEA11, PEA12 and PEA13); and
3. within other designated centres as identified within the retail hierarchy set out in Policy VC1.

Positively Prepared

Vision and Strategic Priorities

9.92 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing. The policy will also help to support vibrant, well supported, town, district and local centres and create an Urban Core that is revitalised.

9.93 Policy EG5 will deliver the following strategic priorities 1, 2, 5 and 6.

Draft Plan Comments

9.94 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- Highways England support the development of offices in the Urban Core, however resists the potential development of offices out of centre.

How Issues Have Been Taken into Account at Publication Draft

9.95 Council will continue to work with Highways England to model the potential impacts of this policy on the SRN.

Publication Draft Comments

9.96 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Friend of Sunderland Green Belt (PD3021) state there no evidence of commercial need for offices. Better to use space for mixed use residential close to transport hubs.

How Issues Have Been Taken into account prior to Submission

9.97 The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. In response to Friends of Sunderland Greenbelt, the Council undertook an Employment Land Review (2016) which outlined a need for 15 ha of land for office based development over the plan period. Consequently, there is sufficient evidence of commercial offices over the plan period and a justified need for policy EG5.

Duty to Cooperate (SD11)

9.98 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

9.99 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

9.100 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD6)

9.101 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	-	++	+	~	~	++	+	~	~	+	+	~	~	~

9.102 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

9.103 Maintaining a sufficient supply of office space is important to the future development of the City. Sectors which locate their activities within office space tend to be more productive and offer better employment prospects. Consequently, setting an office based planning policy is important for enabling economic development opportunities for the city. Furthermore, Paragraph 23 of the NPPF sets out the need for local plans to allocate suitable sites to meet the full office development requirements. In terms of investigating the likely need of office based developments the ELR (SD.37) and the supplementary 'Employment Land Review Post EU Referendum Forecasting Analysis' (February, 2017) (SD.38) set out scenarios for office needs over the plan period as part of a wider analysis of the employment land requirements. The scenarios outlined the following requirements over the plan period (2015 to 2033) (ELR Post EU Referendum Forecasting Analysis, February 2017 – Pg 17) (SD.38):

- a.) Baseline Job Growth = 6.0 Ha (2015 to 2033)
- b.) Policy-On Job Growth = 7.2 Ha (2015 to 2033)
- c.) Past Take Up Rates = 20.0 Ha (2015 to 2033)
- d.) Labour Supply = 5.8 Ha (2015 to 2033)

9.104 The ELR stated that 15 ha of land for office based development should be planned for over the plan period (ELR 2016 pg 87) (SD.37). Alongside the quantitative growth requirements set out above, the ELR outlined qualitative gaps such as the lack of modern office development within the city centre and the shortage of SME/move on space for office based businesses (para 7.100 pg 87) (SD.37).

9.105 These requirements (set out above) demonstrate the need for office based growth over the plan period (2015 to 2033). Policy EG5 directs development to the following locations:

- *The Vaux Site* In order to improve the vitality and viability of the City Centre, the Council is seeking to direct new office development to the Vaux site, which is identified within the plan as an office-led mixed use allocation under Policy SS1. In alignment with the NPPF which directs plans to identify suitable town centre sites for office development (NPPF, para 23), Vaux is considered to be Sunderland's flagship office development and given its favourable location within the City Centre in an area of high public transport accessibility and located in close proximity to important City Centre assets, it is considered a suitable and sustainable location for office based development. Further justification for the Vaux allocation is provided in Policy SS1.
- *Existing Business Parks* There are a number of existing business parks within the city which are characterised by predominantly office uses, such as Doxford International, Hylton Riverside and Rainton Bridge South. It is therefore considered to be appropriate to continue to support offices in these locations, which would be consistent with their existing function. Directing growth to these locations is set out in citation 2 of the policy.

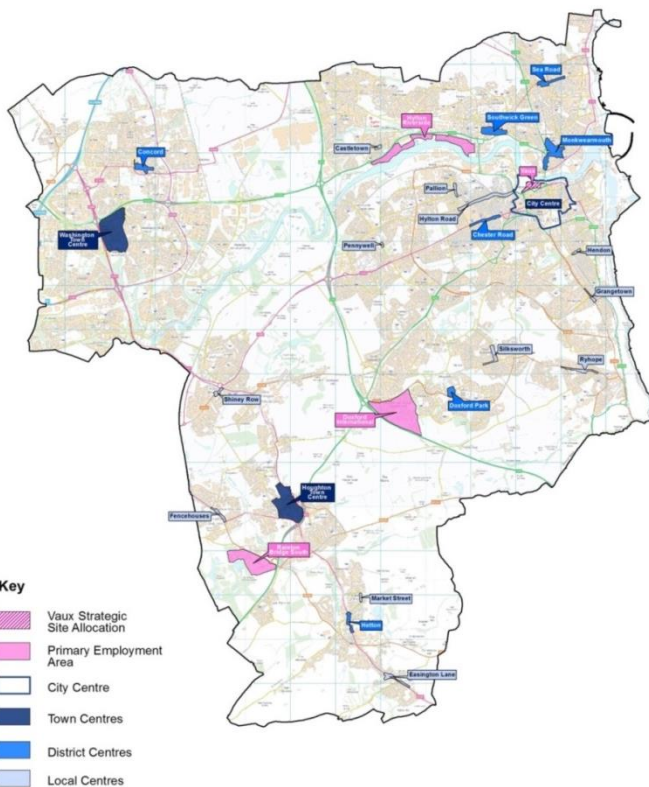


Figure 39 Priority locations for office development

- *Main Town Centre Uses* Office use is recognised within the NPPF as a 'Main Town Centre Use' (Annex 2 - Glossary), which should be directed towards designated centres in order to protect and improve their vitality and viability. The policy (at criterion 3) therefore identifies designated centres as an appropriate location for office uses, which is consistent with the NPPF.

9.106 Figure 39 shows the locations which are considered to be appropriate for office development within the city.

Reasonable Alternatives

9.107 Due to national policy requirement of office use being considered a main town centre use it considered reasonable alternatives are limited. The following possibilities are set out below:

- *Office Growth is Directed to Designated Employment Land* - This policy direction where office development is directed to sites which are designated exclusively for B1 (excluding 1a), B2 and B8. These sites are set out at Policy EP2: Primary Employment Areas (criterion 1) and Policy EP3 (Key Employment Areas (criterion 1)). However, this policy approach would not be in accordance with national planning policy which outlines offices as a main town centre use (NPPF, 2012 Paragraph 23) or enshrine the principles of sustainable development. This alternative would not be making the most of regeneration opportunities offered in Sunderland City Centre which offers the best locational advantages and agglomeration benefits.
- *Direct all Office Growth to the City Centre* - This would not offer flexibility and would constrain development at the other designated town centres and Doxford International, Hylton Riverside and Rainton Bridge South (PEA11, PEA12 and PEA13).

Effective

Deliverable

9.108 The policy will be delivered through the submission and determination of planning applications for office use.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG5	Offices	Support for new office developments in specific locations	<ul style="list-style-type: none"> • Significant development of new B1a office uses outside of the Vaux, Doxford International, Hylton Riverside and Rainton Bridge South PEAs • Significant development of new B1a office uses outside of designated retail centres contrary to the retail hierarchy 	<ul style="list-style-type: none"> • Review land allocations identified in the Local Plan • Review the provision of land for B1a office uses in the Plan period • Update the employment land evidence base • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • B1a office floorspace (sqm) permitted on the Vaux and Doxford International, Hylton Riverside and Rainton Bridge South PEAs • B1a office floorspace (sqm) permitted within designated centres 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Employment Land Review • Town Centre & Capacity Studies

Consistent with National Policy

9.109 The policy is consistent with Paragraph 23 of the NPPF as it allocates a range of suitable sites to meet the scale and type of office uses needed in town centres. The policy is also consistent with Paragraph 19 of the NPPF as it seeks to support sustainable economic growth.

EG6 Trade Counters

9.110 Certain business found in employment areas often require an ancillary trade counter for the sale of goods. Policy EG6: Trade Counters sets out criteria for these types of developments within Primary Employment Areas (PEAs) and Key Employment Areas (KEAs). The policy sets a balance between retaining the employment character of these employment areas whilst allowing possible development of trade counters in alignment with the policy.

EG6 Trade Counters

1. Where industrial users within a Primary Employment Area or Key Employment Area require a "trade counter"/ "factory shop" this should be limited to a maximum of 500m² or 15% of the existing industrial floorspace and only be used for the sale of goods made or stored on the premises.
2. Developments for a trade counter/ factory shop should not:
 - i. compromise the industrial nature of the site or area in question;
 - ii. attract customers in such large numbers so as to impede the access arrangements; and
 - iii. cause significant operational difficulties for other neighbouring occupants.

Positively Prepared

Vision and Strategic Priorities

9.111 The policy will assist the delivery of the vision by helping to create a city which is open to business and is responsive to the changing needs and demands of our growing economy; is vibrant and growing with excellent access to a range of job opportunities for all ages, abilities and skills; and is entrepreneurial, a University City at the heart of a low carbon regional economy which creates new and diverse job opportunities particularly in advanced manufacturing. The policy will also help to support vibrant, well supported, town, district and local centres and create an Urban Core that is revitalised.

9.112 Policy EG6 will deliver Strategic Priority 5.

Draft Plan Comments

9.113 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Sunderland Civic Society objected to this policy as they consider the threshold to be too high and the approach create completion for goods sold in centres.

How Issues Have Been Taken into Account at Publication Draft

9.114 The Plan has been amended to reduce the threshold to 500sqm. The Council recognises that the Policy does allow for the sale of goods in addition to those manufactured on the premises, it is considered that the restrictions on the scale would ensure that proposals would not have an impact on the vitality and viability of centres.

Publication Draft Comments

9.115 As set out in the Consultation Statement (SD07), no key issues were raised against policy EG6.

How Issues Have Been Taken into account prior to Submission

9.116 As set out in the Consultation Statement (SD07), no key issues were raised against policy EG6.

Duty to Cooperate (SD11)

9.117 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

9.118 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

9.119 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD6)

9.120 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	++	++	++	++	+	~	~	~	+	~	+	++

9.121 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

9.122 In the context of the NPPF and PPG being silent on trade counter development there is a need to set appropriate and justified local policy criteria through the Plan. The policy seeks to recognise the changing nature of business activities on employment land and that some businesses may require an element of direct sales area in the form of trade counters which are ancillary to the existing industrial floor space. Whilst the policy allows for this flexibility, the policy sets out a balanced approach to protect both the integrity and function of the employment land as well as check the scope of sales activity to reduce the impact on Sunderland’s town centres.

9.123 The policy seeks to support ancillary trade counter and factory shop type facilities on designated Key and Primary Shopping Areas, where the proposals would remain ancillary to the principal use of the building for B1, B2 or B8 use. Ensuring an appropriate balance between allowing trade counter development and supporting the integrity of employment land is ensured by making sure than no more than 15% (or 500 sq metres – whichever is lower) of the existing industrial floor space is used for retail use. This will help protect the industrial function of employment land ensuring that the base use is predominantly B1a, B2 and B8. However, it is also important to ensure that the vitality and viability of designated centres is not significantly adversely impacted by the proposed trade counter development and that the scale of proposals are clearly ancillary to the principal use of the building. The policy therefore limits the amount of retail floorspace to either 15% of the total floorspace of the unit or to 500m², whichever is the lower. This threshold is considered to be appropriate as it is consistent with the lowest locally set threshold for an impact assessment, as set out in Policy VC2.

9.124 The 500 m² threshold was chosen in order to align with the lowest figure with Policy VC2: Retail Impact Assessments. Taking its recommendations from the Sunderland Retail Needs Assessment (2016, pg 152) the policy sets a threshold of 500 m² for edge or out-of-centre retail development that would affect a Local Centre. As development of a trade counter would have similar retail impacts, this threshold is considered appropriate.

9.125 In addition to the 500 m² threshold, the policy also sets a maximum of 15% of the existing industrial floorspace allocated to trade counter activity. This threshold has been set to ensure that industrial floorspace retains its industrial (B1a, B2 and B8) function. 15% has been chosen utilising an officer judgement of a floorspace proportion which is considered ancillary to a wider industrial operation.

Reasonable Alternatives

9.126 The Council considers the following as reasonable alternatives:

- *CSDP not to set out a policy on trade counters* - The Council recognises the need to respond to the changing nature of industrial and business activities taking place on designated employment land and consequently want to be proactive in supporting trade counters in a way which balances modern business needs against protecting the industrial function of industrial land and ensure the vitality and viability of designated centres.

Effective

Deliverable

9.127 The policy will be delivered through the submission and determination of planning applications for trade counter or factory shop type facilities on Primary and Key Employment Areas.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
EG6	Trade counters	Sets out the circumstances where trade counters would be considered acceptable.	<ul style="list-style-type: none"> • Significant increase in trade counter and factory shop outlets in inappropriate locations contrary to policy (>15% of existing floorspace or >500sqm) 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Floorspace (sqm) permitted for ancillary trade counter and factory shop uses within individual industrial areas • Amount of floorspace permitted for retail uses within industrial areas 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications

Consistent with National Policy

9.128 The policy is consistent with Paragraphs 19 and 23 of the NPPF as it seeks to support sustainable economic growth and sets policies for the consideration of main town centre uses which cannot be accommodated in or adjacent to town centres.

10.Vitality of Centres

VC1 Main Town Centre uses and Retail Hierarchy

10.1 This policy sets out the network and hierarchy of centres across the Plan area.

VC1 Main Town Centre uses and Retail Hierarchy

1. The vitality and viability of the centres within the network and hierarchy identified below (and designated on the Policies Map) will be maintained and enhanced:
City Centre: Sunderland City Centre;
Town Centres: Houghton, and Washington.
District Centres: Chester Road, Concord, Doxford Park, Hetton, Monkwearmouth, Sea Road and Southwick Green;
Local Centres: Castletown, Easington Lane, Fencehouses, Grangetown, Hendon, Hylton Road, Market Street (Hetton), Pallion, Pennywell, Ryhope, Silksworth and Shiney Row;
2. the city centre and town centres will be the principal locations for major retail, leisure, entertainment, cultural facilities and services;
3. the District Centres will have a role in providing key services including shopping, commercial, leisure, public and community facilities;
4. the Local Centres will provide a focus for essential community services and small-scale retail facilities to meet day-to-day needs, thereby supporting the wellbeing of local people;
5. neighbourhood shops, services and community facilities located outside of the designated centres will be protected where they are important in meeting day-to-day needs;
6. the development of main town centre uses, will be focused within existing designated centres, as set out within the retail hierarchy. Development outside of existing centres will be expected to follow the sequential assessment approach; and
7. established out-of-centre retail parks – whilst not considered part of the retail hierarchy, will be considered to be sequentially preferable to other out-of-centre locations when considering development proposals for main town centre uses.

Positively Prepared

Vision and Strategic Priorities

10.2 This policy will deliver the spatial vision and strategic priorities by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

10.3 Policy VC1 will help to deliver Strategic Priorities 1, 2, 3, 6 and 7.

Draft Plan Comments

- 10.4 As set out in the Consultation Statement (SD.7)³³⁴, the following issues were raised during the draft Plan consultation;
- Too many shops boarded up and not enough choice
 - Retail space is not needed because of online shopping
 - Want to see a strategy which promotes the City Centre.
 - Sunderland Civic Society requests that the policy be updated to reflect the spatial distribution of retail provision across Sunderland.
 - Historic England welcomes the Policy.
 - Peel investment are not clear why the boundary of Washington Centre has been extended to include Washington Leisure Centre, sports pitches and amenity woodland.

³³⁴[https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- M&G Real Estate welcomes the policy but consider that the plan should be amended to state that there is clear need to ensure opportunities for additional development are maximised (ie. capacity of the existing centre) and so proposals which might prejudice the strategy and its development should be strongly resisted.
- Historic England welcomes the reference to heritage and culture in the policy.
- Sunderland Civic Society raised concerns regarding the inclusion of Monkwearmouth as a District Centre. The Society would also like the Plan to include a policy on out of centre retail parks, amusement arcades and betting shops.
- Wearside Liberal Democrats request St Luke's Terrace to be included in the Policy

How Issues Have Been Taken into Account at Publication Draft

- The Plan includes policies to protect and enhance the city centre as a sub-regional retail destination. In regards to the amount of retail space needed, the Retail Needs Assessment has calculated the needs and taken into consideration likely future trends.
- The Plan has been amended to include an indicative spatial distribution for the retail floorspace, as set out in Policy SP9.
- The Plan has been updated to include a Strategic Policy on the Urban Core.
- In regards to Peel Investments comments, the wider town centre boundary is consistent with that within the previous UDP and the recommendations of the Retail Needs Assessment. This plan does not contain site specific allocations for retail uses, therefore those within the UDP will continue to be saved until they are replaced by new retail allocations through the A&D Plan.
- It is considered that the policies within the Plan offer sufficient protection to the vitality and viability of Washington town centre until allocations are made through the emerging Allocations and Designations Plan.
- The amendments to the position of Monkwearmouth Centre within the hierarchy and the justification for its revised boundaries are set out within the Retail Needs Assessment. The retail park is only afforded protection as it would become part of an extended designated centre; however other retail parks would not.
- Policy VC1 has been updated to include a reference to out-of-centre retail parks, however it is not considered necessary to include a specific policy for amusements arcades and betting shops.
- In response to Wearside Liberal Democrats, the Plan identifies Pallion as a Local Centre within the retail hierarchy, which includes this St Luke's Terrace.

Publication Draft Comments

- 10.5 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;
- Urban and Civic (PD838) supports the definition of Houghton-le-Spring as a Town Centre and the identified boundary which includes the former Houghton Colliery site.
 - M&G Real Estate (PD3606) supports the policy but suggests the CSDP overestimates retail need and does not consider there to be any available sites in Washington Town Centre. They suggest an amendment to paragraph 2 to say major instead of principal and assert that point 7 could encourage out-of-centre development.

How Issues Have Been Taken into account prior to Submission

- 10.6 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by M&G Real Estate (PD3606), the Council considers this Policy clear in the proposed hierarchy of centres and 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 retail parks will be preferred over other out-of-centre sites. The Policy is not considered to encourage out-of-centre development.

Duty to Cooperate (SD.11)

10.7 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy.

Sustainability Appraisal (2017) (SD.12)

10.8 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives (SD.12). The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

10.9 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)

10.10 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	-	++	+	+	+	++	+	~	~	+	+	~	++	~

10.11 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

10.12 Paragraph 23 of the NPPF (2012) states that when drawing up Local Plans, local planning authorities should: 'define a network and hierarchy of centres that is resilient to anticipated future economic change'. Policy VC1 sets out the role of designated centres in the plan area and their position in the retail hierarchy. These are broadly carried across from designations in the UDP and are supported by the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39)³³⁵. The assessment includes a review of the previous Retail Needs Assessment undertaken in September 2009; a review of the health checks of Town, District and Local Centres in January 2015; and new health checks for Sunderland City Centre and Washington and Houghton Town Centres.

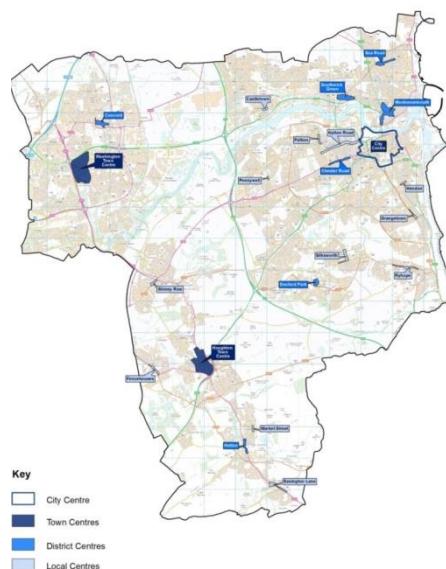


Figure 40 Location of identified centres across the Plan area

10.13 The Assessment evaluates the hierarchy as outlined in Draft Policy CS5.1 of the Draft Plan to confirm whether or not it provided an appropriate network and to identify the realistic role and function of

³³⁵[https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

centres in each level of the hierarchy. The Sunderland Retail Needs Assessment (2016: p144) (SD.39) recommends that the distinction between 'major district centres' and 'district centres' is withdrawn in favour of these all being categorised as 'district centres'. It is also recommended that, following the completion of the Sunderland Retail Park, Monkwearmouth should be designated as a 'district centre' rather than a 'local centre' and that Thorndale Road is no longer included as a 'local centre' within the retail hierarchy as it is more aligned to a small parade of shops of purely local significance (2016: p145) (SD.39). The Council acknowledges the changed role and status of these centres and classifications and has amended the definitions and hierarchy in VC1 accordingly.

City Centre: Sunderland City Centre.

Town Centres: Houghton, and Washington.

District Centres: Chester Road, Concord, Doxford Park, Hetton, Monkwearmouth, Sea Road and Southwick Green.

Local Centres: Castletown, Easington Lane, Fencehouses, Grangetown, Hendon, Hylton Road, Market Street (Hetton), Pallion, Pennywell, Ryhope, Silksworth, and Shiney Row.

Figure 41 Retail Hierarchy as set out in Policy VC1

10.14 The Council recognises the role of out-of-centre retail parks, of which there are several within the plan area. Whilst these do not form part of the retail hierarchy, the Council considers it appropriate that established out-of-centre retail parks are considered sequentially preferable to other out-of-centre sites. The most established out-of-centre retail parks are considered to be Peel Centre, Washington; Hylton Retail Park; Pallion Retail Park; and Salterfen, Ryhope Road, Grangetown.

10.15 Where out-of-centre development is justified, these sites will be considered preferable to other out-of-centre sites as they are well integrated into the public transport network and each are serviced by a substantial number of frequent bus routes. Pallion Retail Park is also connected to the Tyne and Wear Metro Service and is easily accessed by the new Northern Spire Bridge.

10.16 The Council is of the opinion that the policy is clear in the proposed hierarchy of centres and therefore which are the sequentially preferred sites for main town centre uses. If it can be sequentially demonstrated that there are no suitable sites available within any of these centres, then retail parks will be preferred over other out-of-centre sites. Overall, the Retail Needs Assessment (2016: pp143-144) (SD.39) recommends that the proposed network and hierarchy of centres as set out in Policy VC1 are fit for purpose and within the requirements of the NPPF and PPG.

Reasonable Alternative

10.17 An alternative approach would be to not prioritise out-of-centre retail parks over other out-of-centre sites. This would treat each application for main town centre uses out of designated centres equally, whether they are within an out-of-centre retail park or not.

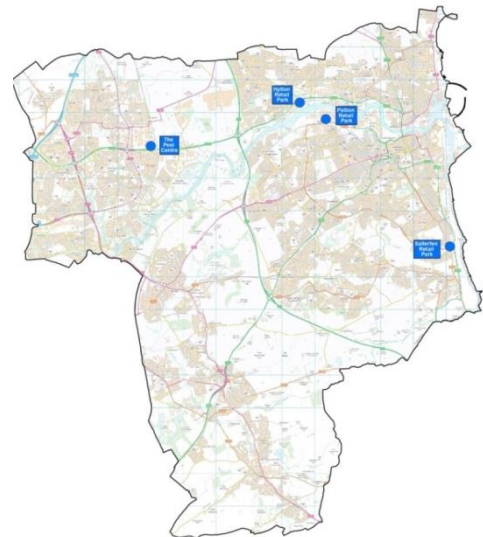


Figure 42 Out-of-Centre Retail Parks

Each application would still require a sequential assessment as they would with the current approach and would be based on their individual merit. This option is not included in the plan as the Council considers out-of-centre retail parks more suitable and sustainable locations for retail development due to already being established shopping destinations and easily accessible by sustainable modes of transport.

Effective

Deliverable

10.18 The policy will be delivered through the submission and determination of planning applications. Site specific allocations will be made through the Allocations and Designations Plan to meet the needs for Main Town Centre Uses over the plan period.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC1	Main town centre uses and retail hierarchy	Establishes the retail hierarchy for the City and to protect and enhance the viability and vitality of designated retail centres	<ul style="list-style-type: none"> Significant increase in retail development proposals approved outside of identified centres Significant development of (A1, A2, A3 and A5) retail uses contrary to the sequential approach 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review Local Plan policy and retail site allocations Review the provision of land for A1, A2, A3 and A5 retail uses in the Plan period Update the retail evidence base Review Local Plan policy and retail site allocations Review the provision of land for A1, A2, A3 and A5 retail uses in the Plan period 	<ul style="list-style-type: none"> Existing and new retail A1, A2, A3 and A5 units and floorspace (gross and net sales sqm) permitted/developed in designated city, town, district and local centres Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in the designated primary shopping areas of city and town centres Numbers of vacant retail units and floorspace (gross and net sales sqm) in designated city, town, district and local centres Numbers of units and retail floorspace (gross and net sales sqm) lost to non-A Class uses within designated city, town, district and 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies Springboard footfall counts

					local centres <ul style="list-style-type: none"> Existing and new retail A1, A2, A3 and A5 floorspace (gross and net sales sqm) developed in edge-of-centre locations 	
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Consistent with National Policy

10.19 The policy is consistent with national policy as it defines a network and hierarchy of centres that is resilient to anticipated future economic changes; and recognises town centres as the heart of their local communities and provides policy coverage to support their vitality and viability in support of NPPF Paragraph 23.

10.20 The policy indicates that the sequential test should be applied to planning applications for main town centre uses that are not in an existing centre in accordance with NPPF Paragraph 24.

SP9 Comparison Retail

10.21 This policy sets out the indicative spatial distribution of comparison retail across the Plan area.

SP9 Comparison Retail

In order to meet identified development needs, at least 45,400m² of comparison retail floorspace (Use Class A1) will be provided. The overall distribution of floorspace should broadly be as follows:

Sub-Area	Indicative New Comparison Retail Floorspace (m ²)
City Centre & Sunderland South	26,500
Sunderland North	3,800
Coalfield	2,500
Washington	12,600

Positively Prepared

Vision and Strategic Priorities

10.22 This policy will deliver the spatial vision and strategic priorities by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

10.23 Policy SP9 will help to deliver Strategic Priority 6.

Draft Plan Comments

10.24 As set out in the Consultation Statement (SD.7)³³⁶, this is a new policy which was not included within the draft Plan; however the policy has been introduced to reflect representations from Sunderland Civic Society who requested that the plan included the spatial distribution of retail growth.

³³⁶[https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

How Issues Have Been Taken into Account at Publication Draft

10.25 The policy has been introduced to reflect representations from Sunderland Civic Society who requested that the plan included the spatial distribution of retail growth.

Publication Draft Comments

10.26 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- M&G Real Estate (PD3609) are concerned that Policy SP9 refers to sub areas generally and may encourage out of centre proposals. They claim the Policy offers insufficient protection to Washington Town Centre prior to the adoption of the A&D Plan and that the Policy should make clear that development should be directed to designated centres, that delivery will be phased and impose stronger restrictions on out of centre development.
- Urban and Civic (PD872) states Policy SP9 only deals with the theoretical quantitative capacity for new comparison retail floorspace. It does not include reference to qualitative needs, for either convenience or comparison retailing. 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.

How Issues Have Been Taken into account prior to Submission

10.27 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by M&G Real Estate (PD3609), 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.

10.28 In response to the representations raised by Urban and Civic (PD872), the Sunderland Retail Needs Assessment (2016) (SD.39)³³⁷ 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 A&D Plan. Allocations are not being made through the CSDP.

Duty to Cooperate (SD.11)

10.29 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy

Sustainability Appraisal (2017) (SD.12)

10.30 This is a new policy which was not included within the draft Plan It was therefore not assessed as part of the Sustainability Appraisal (2017) (SD.12).

Sustainability Appraisal (2018) (SD.5)

10.31 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (2018) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	~	~	~	~	~	~	~	~	+	~	~	~

³³⁷[https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

10.32 The SA made the following recommendation for changes to be made to the publication draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
The header of the second column in the table within this policy should be reworded "Indicative New Comparison Retail Floorspace (m2)". This would align with the policy wording, which refers to the floorspaces being distributed "broadly" in line with the table, and clarify that the supermarket earmarked for the Coalfields, as mentioned in the text below the policy, would be additional to the new comparison retail floorspace requirements listed within the table.	Recommendation agreed and implemented.
Consideration should be given to explaining (within the supporting text) the proposed distribution of new comparison retail floorspace between each subarea i.e. is this distribution derived from the Sunderland Retail Needs Assessment or other evidence?	Recommendation agreed and implemented.
The supporting text should be expanded to confirm that potential site allocations within the A&D Plan to meet the stated additional floorspace requirements in each sub-area will be subject to site selection and SA processes, which will need to take account of the role/function, characteristics and capacity of centres within each sub-area and any likely sustainability effects from the allocation of individual sites (e.g. accessibility using public transport, potential displacement effects, etc.).	No changes proposed. The text already makes it clear that this is indicative and the source for this. It is not considered necessary to make it explicit that all sites will be identified through a site selection process and will be required to undertake an SA.

Justified

10.33 Paragraph 23 of the NPPF (2012) states that, in drawing up Local Plans, local planning authorities should allocate a range of suitable sites to meet the scale and type of retail development needed in town centres. It is important that needs for retail development are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites. This policy does not allocate specific sites but provides an indicative spatial distribution of new comparison retail floorspace across the City and Town Centres within the plan area. Specific site allocations will be made through the Allocations & Designations Plan.

10.34 The Sunderland Retail Needs Assessment (2016) (SD.39) provides an up-to-date assessment of the quantitative and qualitative need that is likely to arise in the comparison and convenience sectors in the period up to 2035. Table 7.1 of the Assessment (2016: p109) (SD.39) identifies that under a static retention rate there would be a quantitative need for a total of 50,500sqm of new comparison retail floorspace over the period to 2035, within the survey area. As the survey area extends beyond the administrative area of Sunderland, Table 10 provides what is considered to be a reasonable spatial distribution (including for the area beyond the administrative boundaries of the authority) based on constant market shares. This distribution of 45,400 sq.m aims to reverse the recent trend of comparison retail polarisation in Sunderland City Centre by marginally reducing the City Centre’s share of comparison floorspace, whilst boosting the shares for Washington and the Coalfield, with no impact on Sunderland North. The Council considers this to provide the most appropriate distribution and this is taken forward within the policy.

Table 35 Reasonable Alternative Distribution of Comparison Goods Net Gain in Occupied Floorspace Need by Core Strategy Sub-Area based on Constant Market Shares

Zones	Sub-Area (Approximately)	Percentage Share	Net Gain in the Occupied Comparison Floorspace Stock Sq.m Gross
1, 2 and 3	Sunderland South and City Centre	52.5%	26,500
4 & 5	Sunderland North	7.5%	3,800
6 & 7	Coalfield	5.0%	2,500
8 & 9	Washington	25.0%	12,600
Sub-Total for SCC	Sunderland City Council Area	90.0%	45,400
10 to 15	Outside the admin area of SCC	10.0%	5,100
Total	Overall Survey Area	100.0%	50,500

10.35 The above figures are indicative. This is intended to allow greater flexibility in facilitating retail development. The Council will make site specific allocations through the Allocations and Designations Plan to meet the needs identified within the policy which will identify land allocations to deliver the increased floorspace. Existing retail allocations made in the UDP will continue to be saved until replacement allocations are made in the Allocations & Designations Plan is adopted. At this stage the policy provides broad support for increased comparison retail activity within the hierarchy of centres, which would support increased economic activity, town centre vitality and local employment. The Publication Draft Sunderland CSDP Sustainability Appraisal (2018) (SD.5) predicts a 'Major Positive' effect for Sustainability Objective 3: Economy and Employment as a result of the policy.

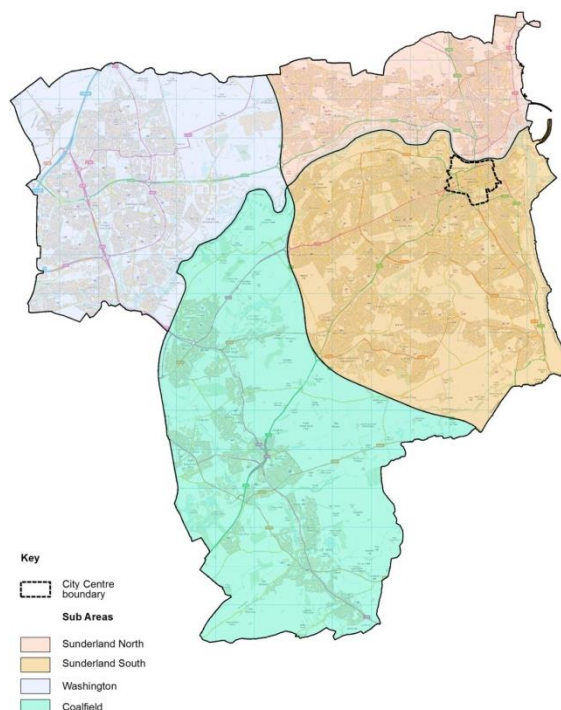


Figure 43 Plan Sub-Areas

10.36 The sub-areas used to spatially distribute floorspace across the plan area are based on the four recognised sub-areas of Sunderland North, Sunderland South, Washington and the Coalfield. The City Centre is included within the Sunderland South distribution as this is where it is located. It is important to distinguish between the City Centre – which is entirely south of the river – and the Urban Core which includes areas north of the river. The City Centre and Sunderland South has a much higher distribution of retail floorspace than the other sub-areas due to the City Centre being the Principal Shopping Area for the plan area. It is envisaged that the majority of this will be directed to the City Centre.

10.37 The Sunderland Retail Needs Assessment (2016: p111) (SD.39) 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.

Reasonable alternatives

10.38 The total level of proposed new comparison retail floorspace – or the distribution of this between individual centres – could be varied, although varying the total floorspace requirement would be inconsistent with the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39). This approach would not be based on the most up-to-date and robust evidence base and therefore would not be justified.

Effective

Deliverable

10.39 The policy will be delivered through the submission and determination of planning applications. Site specific allocations will be made through the Allocations and Designations Plan to meet the needs for comparison retail growth over the plan period and to address the need for further convenience floorspace within the Coalfield sub-area.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP9	Comparison retail	Sets out the amount of comparison retail floorspace that is required in each sub area	<ul style="list-style-type: none"> Development is not brought forward as expected 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Comparison retail floorspace permitted by sub-area (sqm) Comparison retail floorspace completed by sub-area (sqm) 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications Employment Land Review Retail Needs Assessment

Consistent with National Policy

10.40 The policy is consistent with national policy as it sets out the requirement for retail floorspace to meet identified needs and sets out an indicative spatial distribution for future allocations which will be made through the Allocations and Designations Plan.

VC2 Retail Impact Assessments

10.41 This policy aims to minimise adverse impacts to existing centres by setting out the thresholds above which retail impact assessments will be required as part of the application process.

VC2 Retail Impact Assessments

1. When assessing applications for edge or out-of-centre retail development (Use Class A1), the council will require an impact assessment to be submitted where the development would exceed the following local thresholds:

	Convenience retail:	Comparison retail:
City Centre	2,000m ²	2,500m ²
Washington Town Centre	1,250m ²	1,500m ²
Houghton Town Centre	750m ²	750m ²

District Centres	750m ²	750m ²
Local Centres	500m ²	500m ²

2. The council will refuse planning permission where there is evidence that development is likely to have a significant adverse impact upon the vitality and viability of a designated centre.

Positively Prepared

Vision and Strategic Priorities

10.42 This policy will deliver the spatial vision and strategic priorities by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

10.43 Policy VC2 will help to deliver Strategic Priority 6.

Draft Plan Comments

10.44 As set out in the Consultation Statement (SD.7)³³⁸, the following issues were raised during the draft Plan consultation;

- Sunderland Civic Society considers that it is difficult to determine which centre the development would have an impact on and therefore which threshold should apply. Peel Investments also oppose the threshold policy in regards to the impacts on Washington.

How Issues Have Been Taken into Account at Publication Draft

10.45 The thresholds set are consistent with the recommendations of the Retail Needs Assessment. The supporting text provides clarity on which threshold will apply,

Publication Draft Comments

10.46 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- M&G Real Estate (PD3612) suggests the Policy does not take account of the potential cumulative impacts of development and suggest that the threshold is restricted to 1,000sqm. The policy should include an element of phasing until the A&D Plan is adopted.

How Issues Have Been Taken into account prior to Submission

10.47 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to representations raised by M&G Real Estate (PD3612), Sunderland City Centre is a large sub-regional centre, which is well positioned to withstand significant adverse impacts from out-of-centre retail developments. The NPPF default threshold will continue to apply for comparison retail developments which are likely to affect the city centre. The thresholds chosen for each centre are consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39)³³⁹.

Duty to Cooperate (SD.11)

10.48 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy

³³⁸ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

³³⁹ [https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

Sustainability Appraisal (2017) (SD.12)

10.49 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

10.50 The SA (SD.12) made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)

10.51 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	~	~	~	++	~	~	~	+	+	~	~	~

10.52 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

10.53 The NPPF (2012) states that local planning authorities should require an impact assessment if a development proposal exceeds, either: a proportionate, locally set floorspace threshold, or if there is no locally set threshold, the default threshold of 2,500 sqm. The Sunderland Retail Needs Assessment (2016) (SD.39) undertook a health check of Sunderland City Centre and Houghton and Washington Town Centres, whilst also reviewing previous health checks of the District and Local Centres.

10.54 Taking into consideration the evidence gathered as part of this assessment, Paragraphs 9.19-9.30 of the Sunderland Retail Needs Assessment (2016: pp149-153) (SD.39) sets out recommendations relating to the introduction of a proportionate locally set threshold for impact assessments for retail development.

10.55 Due to the wide diversity and scale of designated centres across the city, the assessment recommends that a range of local thresholds are required dependent on which centres are most susceptible to impacts from proposed edge and out-of-centre developments. 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.

10.56 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.

10.57 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

those recommended in Table 36, taken from the Sunderland Retail Needs Assessment (2016) (SD.39), as shown below.

Table 36 Floorspace Thresholds for Impact Assessments - Sq.m Gross External Area (GEA)³⁴⁰

Centre	Convenience Goods Thresholds	Comparison Goods Thresholds
Sunderland City Centre	2,000 sq.m GEA	2,500 sq.m GEA
Washington Town Centre	1,250 sq.m GEA	1500 sq.m GEA
Houghton-le-Spring Town Centre	750 sq.m GEA	750 sq.m GEA
District Centres	750 sq.m GEA	750 sq.m GEA
Local Centres	500 sq.m GEA	500 sq.m GEA

- 10.58 The Sunderland Leisure Needs Assessment (2016) (SD.39) identifies that the vitality and viability of the city's centres are underpinned predominantly by retail and service uses, therefore their future vitality and viability are not at significant risk as a result of out-of-centre leisure developments. It is proposed that the default NPPF threshold should continue to be used for leisure development within existing centres as well as out-of-centre proposals.
- 10.59 The Council does not have any evidence available to justify setting a lower locally set threshold for office development, therefore the default threshold of 2,500 sqm will continue to apply.

Reasonable Alternatives

- 10.60 An alternative would be to rely on the default NPPF threshold. This was not considered to be appropriate due to the sensitivity of some of the city's centres to significant adverse impacts from out-of-centre development, as set out within the Sunderland Retail Needs Assessment (2016) (SD.39).
- 10.61 Another alternative given consideration but dismissed was a standard threshold for all Centres above which an impact assessment would be required. This was not considered appropriate due to the varying scale, health and ability to withstand impacts of each Centre.
- 10.62 Consideration was given to the use of a lower threshold until retail allocations are made in the A&D Plan. However, until these allocations are made, the existing retail allocations made in the UDP will be saved and so it was not considered necessary. The Council accepts the locally set thresholds recommended by the Sunderland Retail Needs Assessment (2016: pp149-152) (SD.39) which is the most up-to-date and robust evidence base available. These recommendations consider, amongst other factors, the cumulative effects of recent developments and the likely effects of development on existing Centres. The locally set thresholds stated in Policy VC2 are considered appropriate for their respective Centres.
- 10.63 As the threshold for impact assessments vary for each Centre, consideration was given to how a threshold is used for a proposal which could impact on more than one Centre. The Sunderland Retail Needs Assessment (2016) (SD.39) recommends using the threshold of the Centre which will be most impacted by the development. This was dismissed in favour of using the threshold of the Centre which is geographically closest to the application site,

³⁴⁰ Source: Sunderland Retail Needs Assessment (2016: Table 9.2, p152)

as determining which Centre will feel more impact would introduce an element of discretion and ambiguity and the Council aims for transparency and clarity in the planning process.

Effective

Deliverable

10.64 The policy will apply to any applications which exceed the local thresholds set out within the policy. The policy will allow the Council to assess the impacts of retail schemes to ensure that significant adverse impacts upon designated centres are avoided.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC2	Retail Impact assessments	Sets out the circumstances as to when a Retail Impact Assessment will be required	<ul style="list-style-type: none"> Significant increase in numbers of planning applications (both City-wide and in specific centres) requiring Retail Impact Assessments 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy and Retail Impact Assessment thresholds 	<ul style="list-style-type: none"> Planning applications requiring Retail Impact Assessment 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies Employment Land Review Retail Needs Assessment

Consistent with National Policy

10.65 The policy is consistent with national policy as it sets a proportionate locally set threshold for an impact assessment in accordance with Paragraph 26 of the NPPF.

VC3 Primary Shopping Areas and Frontages

10.66 This policy designates Primary Shopping Areas, Secondary Shopping Areas and Primary Frontages, within the City and Town Centres, and sets out the policy mechanisms which aims to ensure their vitality and viability.

VC3 Primary Shopping Areas and Frontages

- Primary Shopping Areas, as designated on the Policies Map, have been established for Sunderland City Centre and Washington and Houghton Town Centres. These areas should be the focus of new retail development, where possible.
- Development for A1 retail use within the Primary Frontages, as shown on the Policies Map, will be supported.
- Non-A1 uses in Primary Frontages will only be considered acceptable where it can be demonstrated that premises have been vacant and marketed unsuccessfully for A1 uses for a period of least 24 months.
- Where proposals for non-A1 use within primary shopping areas cannot demonstrate that they have satisfied the above, they will normally be resisted if they would result in:
 - more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre²
 - being in non-A1 retail use; or
 - more than 25% of each Primary Frontage thoroughfare in Washington Town Centre being in non-A1 retail use; or
 - more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use.
- A more diverse range of uses will be supported within Secondary Frontages including retail, service, leisure, entertainment facilities, offices, arts, culture, tourism and residential uses.

Positively Prepared

Vision and Strategic Priorities

10.67 This policy will deliver the spatial vision and strategic priorities by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

10.68 Policy VC3 will help to deliver Strategic Priorities 2 and 6.

Draft Plan Comments

10.69 As set out in the Consultation Statement (SD7)³⁴¹, the following issues were raised during the draft Plan consultation;

- Historic England welcomes the policy.

How Issues Have Been Taken into Account at Publication Draft

10.70 No issues raised which required further amendments to this policy.

Publication Draft Comments

10.71 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Historic England (PD101) support the diverse range of uses proposed for Secondary Frontages.
- Siglion (PD3120) put forward that 15% A1 rule should be more flexible and there should be more flexibility for marketing of A1 use for 24 months.
- M&G Real Estate (PD3615) suggest the 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.

How Issues Have Been Taken into account prior to Submission

10.72 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to representations raised by Siglion (PD3120) and M&G Real Estate (PD3615), the Sunderland Retail Needs Assessment (2016) (SD.39)³⁴² recommends a marketing period of 6-24 months for non-A1 uses within Primary Frontages. 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. This Policy is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39).

Proposed Modifications to the Publication Draft

10.73 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
VC3	Where proposals for non-A1 use within	Typographical error

³⁴¹ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

³⁴² [https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

	primary shopping areas cannot demonstrate that they have satisfied the above, they will be normally be resisted if they would result in...	
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Duty to Cooperate (SD.11)

10.74 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy

Sustainability Appraisal (2017) (SD.12)

10.75 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

10.76 The SA (SD.12) made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)

10.77 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	~	~	~	++	~	~	~	+	+	~	~	~

10.78 The made no recommendations for changes to be made to the Publication Draft.

Justified

10.79 The management and growth of retail development within designated centres helps build positive and competitive town centre environments. Paragraph 23 of the NPPF (2012) states that when drawing up Local Plans, local planning authorities should: 'define the extent of Town Centres and Primary Shopping Areas, based on a clear definition of Primary and Secondary Frontages in designated Centres, and set policies that make clear which uses will be permitted in such locations'. Policy VC3 designates the Primary Shopping Areas, Primary Frontages and Secondary Frontages of designated centres within the plan area and specifies which uses will be permitted in these locations. These designations are broadly carried across from the UDP and are supported by the recommendations of the Sunderland Retail Needs Assessment (2016) (SD.39).

10.80 The Sunderland Retail Needs Assessment (2016) (SD.39) includes a review of the previous Sunderland Retail Needs Assessment undertaken in September 2009; a review of the health checks of Town, District and Local Centres in January 2015; and new health checks for Sunderland City Centre and Washington and Houghton Town Centres. Using the evidence gathered, Chapter 8 of the report makes recommendations with respect to the Primary Shopping Areas, overall Town and City Centre boundaries, Primary and Secondary Frontages, development opportunity areas and areas in need of diversification and improvement.

10.81 Policy VC3 prioritises Primary Shopping Areas as the focus of new retail development and supports the development of A1 retail use within Primary Frontages. Primary Frontages are

likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary Frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas, service, leisure, entertainment and office development.

Sunderland City Centre

10.82 With regard to Sunderland City Centre, the Sunderland Retail Needs Assessment (2016) (SD.39) considers that the 'Retail Core' boundary identified in Figure 2 of UDP Alteration No. 2 is representative of the NPPF definition of a 'Primary Shopping Area', although the report makes recommendations for a number of amendments to this boundary, which are illustrated in Figure 44. Overall, the recommendations result in a reduction in the size of the Primary Shopping Area due to the exclusion of 6 parcels of land which are characterised by non-retail uses. The report

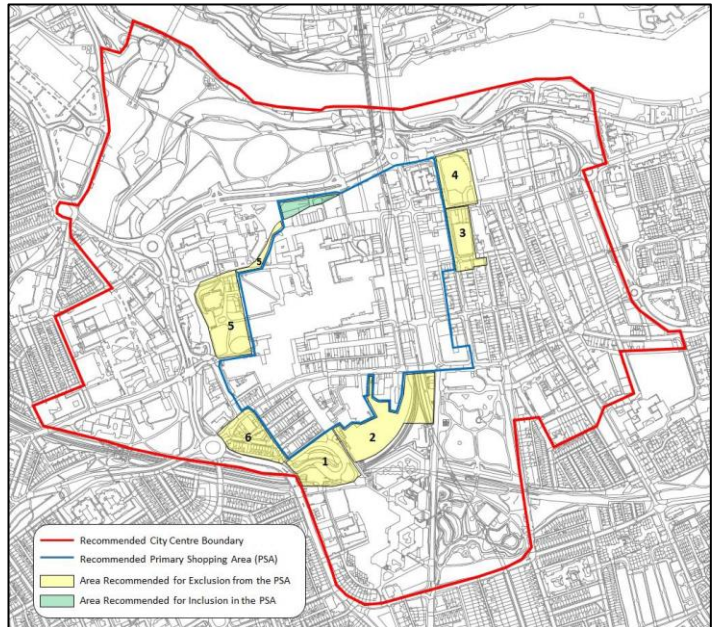


Figure 44 Recommended Definition of Sunderland City Centre's Primary Shopping Area and the Overall Extent of the City Centre Boundary Source *The Sunderland Retail Needs Assessment (2016: Figure 8.1, p123)*

recommends one addition to the Primary Shopping Area to reflect the realignment of St. Mary's Way. The Primary Shopping Area proposed in Policy VC3 is consistent with the recommendations of the Retail Needs Assessment.

10.83 The report makes recommendations for the establishment of Primary and Secondary Frontages within Sunderland City Centre as shown in Figure 24 below. These are broadly carried across from the designations in the UDP. The proposed Primary Frontages are around The Bridges shopping centre, High Street West, Keel Square, Blandford Street, Market Square and Union Street. These thoroughfares contain the highest proportion of retail uses in the City. Secondary Frontages include High Street West, Fawcett Street, the northern end of John Street, St. Thomas Street, Waterloo Place, Athenaeum Street, Holmeside, Park Lane, Vine Place, Derwent Street and Olive Street. These recommendations inform the designated Primary and Secondary Frontages in Policy VC3.

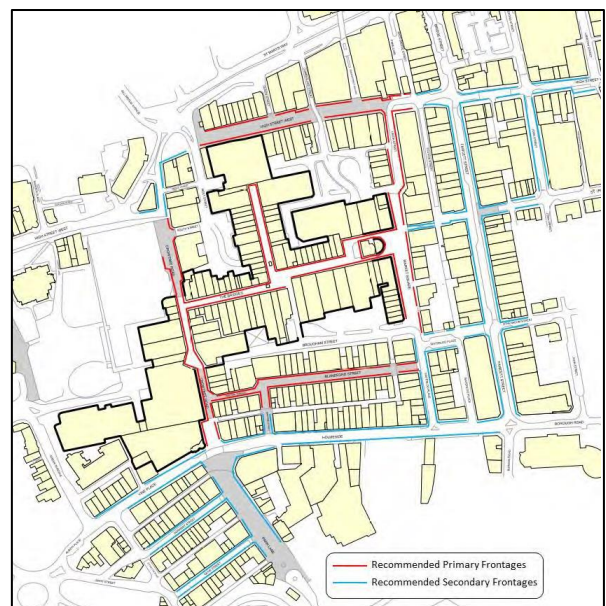


Figure 45 Recommended Primary and Secondary Frontages within Sunderland City Centre Source *The Sunderland Retail Needs Assessment (p125)*

Washington Town Centre

10.84 Paragraphs 8.22-8.24 of the Sunderland Retail Needs Assessment (2016: p131) (SD.39) recommend that Washington Primary Shopping Area should be tightly

drawn around the Galleries Shopping Centre, the units on the Galleries Retail Park and the walkway connecting these shopping areas. Whilst this differs from the 'Main Shopping Area' shown on the Washington inset plan of the UDP, this was adopted in the context of PPG6, which did not provide a definition for the 'Primary Shopping Area' and is therefore not considered to be appropriate for the designation of the Primary Shopping Area.

- 10.85 The proposed Primary Shopping Area identified in Policy VC3 is consistent with the recommendations of the Sunderland Retail Needs Assessment (2016: p131) (SD.39) and is shown in Figure 25 below. It is tightly drawn around the whole of the Galleries shopping area, around the units in the Retail Park and the walkway between the two. This does not offer the scope for meeting the need for retail development in Washington that has been identified for the period up to 2035. Therefore, there are areas shaded green in Figure 46 identified as planned extensions to the Primary Shopping Area. These areas represent parts of the car parks for the Galleries and surrounding areas and are existing retail allocations in the UDP which have not come forward for retail development. The retail allocations will be saved until they are replaced by allocations in the A&D Plan. These planned extensions to the Primary Shopping Area should be capable of meeting the retail need identified for Washington in the period up to 2035.

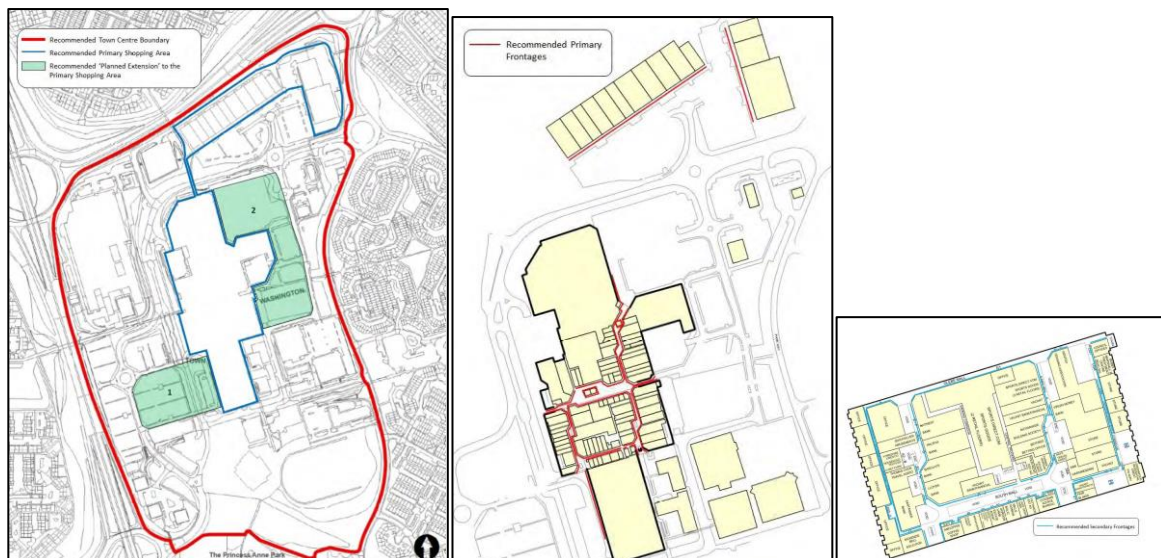


Figure 46 Recommended Definition of Washington Town Centre's Primary Shopping Area; Primary and Secondary Frontage; Recommended 'Planned Extension' to the Primary Shopping Area; and the Overall Extent of the Town Centre Boundary

- 10.86 Paragraph 8.25 of the Sunderland Retail Needs Assessment (2016: pp132-133) (SD.39) makes recommendations for the establishment of Primary and Secondary Frontages within Washington Town Centre, shown in Figures 46 above. All of the ground floor level frontages within the Galleries Shopping Centre are designated as Primary Frontages, and that the frontages to the retail units in the Galleries Retail Park are also designated as Primary Frontages. The frontages to the premises in the upper level of the Galleries are designated as Secondary Frontages, given the high proportion of non-retail uses at this level. These recommendations have also been taken forward in the plan.

10.87 The proposed Primary Shopping Area of Houghton is similar to the area identified in the UDP. However, Paragraph 8.28 of the Sunderland Retail Needs Assessment (2016: p136) (SD.39) proposes one addition and one deletion to the boundary. The addition

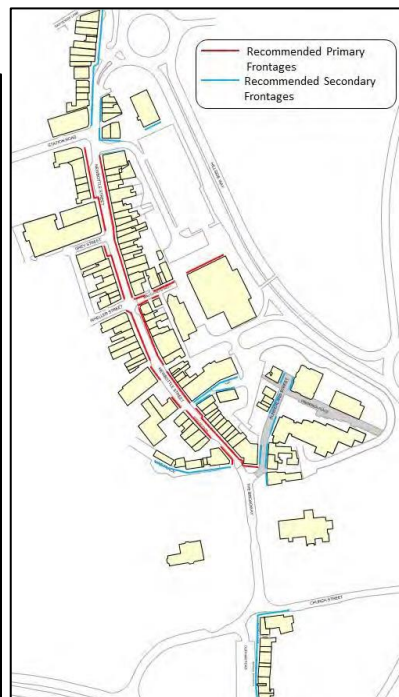
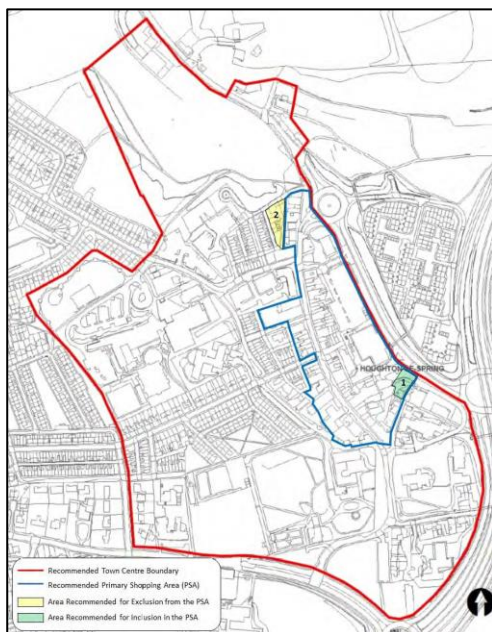


Figure 47 : Recommended Definition of Primary Shopping Area, Town Centre Boundary, and Primary and Secondary Frontages within Houghton-le-Spring Town Centre

highlighted blue in Figure 26 is an area not currently utilised to its full potential which forms part of a wider development opportunity. The deletion is an area of primarily residential use which is highlighted in yellow. The Primary Shopping Area proposed in Policy VC3 is consistent with the recommendations of the Retail Needs Assessment, shown in Figure 47.

10.88 The report makes recommendations for the designation of Primary and Secondary Frontages within Houghton Town Centre, as shown in Figure 47 Primary Frontages cover both sides of Newbottle Street to the south of its intersection with Station Road. Mautland Street is included as a Primary Frontage, given its important future role in linking the new Lidl store with Newbottle Street. Secondary Frontages are located within the Primary Shopping Area, but designation is also given to the properties on Durham Road, to the south of Church Street. These recommendations have been taken forward in the plan.

10.89 In addition to defining and designating Primary Shopping Areas, Primary Frontages and Secondary Frontages, Policy VC3 includes a policy mechanism for controlling the amount of non-A1 development within Primary Frontages. Proposals for non-A1 within Primary Frontages will only be considered acceptable where it can be demonstrated that the premises have been vacant and marketed unsuccessfully for A1 use for a period of at least 24 months. This is based on a policy recommendation from the Sunderland Retail Needs Assessment (2016: pp158-159) (SD.39) on the basis of evidence gathered from their fieldwork, policy review and examples of retail policies from other Authorities which have recently passed Examinations in Public. The Sunderland Retail Needs Assessment (2016) (SD.39) suggests a marketing period of 6-24 months. The higher end of this range has been taken forward as 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.

- 10.90 Policy VC3.4 contains the second part of this suggested policy mechanism. Where proposals for non-A1 use within areas of Primary Frontage cannot demonstrate that they have satisfied this marketing period, they will normally be resisted if 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 is based on the same evidence detailed above from the Sunderland Retail Needs Assessment (2016) (SD.39).
- 10.91 Primary Frontages are those which are the main shopping areas of the higher order centres and it is therefore important that the Council continues to preserve the predominance of A1 retail uses within these frontages. This policy mechanism aims to maintain the designated centres of the plan area as the heart of their communities and to support their viability and vitality. Whilst retail use will continue to be the predominant focus within these Frontages, there is a recognition that the vitality and viability of Washington and Houghton Town Centres is underpinned by a wider diversity of uses and therefore the proportion of the Primary Frontages in these Centres which should be retained in retail use is set at a lower level in the policy to reflect this.
- 10.92 Secondary Frontages represent an opportunity for a more diverse range of uses within the city's centres. The Council will therefore support a wide diversity of appropriate uses including retail, service, leisure, entertainment facilities, offices, arts, culture and tourism, and residential uses.
- 10.93 Area Proposal SA71 of the UDP defines a thoroughfare as "...an unobstructed public way, comprised of both sides of the street (or one if bisected by a busy road) and a number of Frontages". The Retail Needs Assessment recommends designated Primary Frontage thoroughfares for clarity. These can be found in Figures 9.1, 9.4 and 9.5 of Volume 2 of the Sunderland Retail Needs Assessment (2016) (SD.39). These are the designated thoroughfares to be used in the interpretation of part 4 of Policy VC3. It has been noted that there are two errors in the Publication Draft version of Policy VC3. These are detailed in the Amendments to the Draft Plan section of this report.

Reasonable Alternatives

- 10.94 An alternative policy approach would be to include the further recommended policy mechanism for controlling non-A1 uses within Primary Frontages. The report suggests that if a cluster of more than 3 adjoining units are in non-A1 use at the ground floor Primary Frontage in each thoroughfare, then the application should be refused. This suggested trigger is in addition to the % threshold taken forward in the policy. It is considered that the trigger included in the policy is sufficient to protect the vitality and viability of Centres. Opting not to include the clustering trigger allows greater flexibility in facilitating the development of centres.
- 10.95 Another alternate approach to Policy VC3.3 would be to opt for a shorter marketing than the required 24 months. As stated above, a shorter marketing period will not provide sufficient opportunity for A1 development to come forward and 24 months provides an appropriate balance to ensure long term vacancies are avoided and the prominence of A1 uses is retained within Primary Frontages. An increase in non-A1 development within Primary Frontages would be detrimental to the vitality and viability of Centres and so this should be avoided. The 24 month period of vacancy and marketing is therefore considered sound.

10.96 As the Galleries shopping centre comprises the entirety of the Washington Town Centre. An alternative approach to Policy VC3 is suggested by current owners M&G Real Estate. It is suggested that the policy is amended so the requirements of Policy VC3 do not apply to Washington Town Centre. The Council do not consider this approach appropriate as it cannot be guaranteed that this arrangement will continue. The Council has a responsibility to ensure that designated centres are protected and enhanced across the plan period so cannot give special dispensation to any centre because of an existing ownership arrangement which is not guaranteed to continue in perpetuity. This policy aims to ensure the vitality and viability of Centres for current and future owners, residents, businesses, tenants, and visitors. The Council considers the policy to be sound.

Effective Deliverable

10.97 The policy will apply to any applications within the primary and shopping frontages within Sunderland City Centre and Washington and Houghton Town Centres. The aims of this policy will be delivered through the development management process. The policy aims to retain a predominantly retail focus within Primary Frontages, whilst allowing a wider diversity of uses within Secondary Frontages. This will help to retain a retail core within designated centres. Applications for non-A1 use within Primary Frontage thoroughfares will require evidence to demonstrate they have been unsuccessfully marketed for A1 use for 24 months. Where this requirement is not met, applications will be resisted if they would result in Primary Frontages exceeding the non-A1 threshold stated for each centre.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC3	Primary shopping areas and frontages	To protect primary retail frontages from non-A1 uses	<ul style="list-style-type: none"> Significant increase in numbers of planning applications granted for non-A1 retail uses within designated primary frontages Significant increases in the percentage of designated primary frontages in non-A1 retail uses (>15% in Sunderland City Centre, >25% in Washington town centre, >40% in Houghton-le-Spring town centre) 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review Local Plan policy and the extents of designations of primary and secondary frontages Update the retail evidence base 	<ul style="list-style-type: none"> Percentage of primary frontages in non-A1 use in designated centres Length of primary frontages in A1, A2, A3 and A5 retail uses in designated city and town centres 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies

Consistent with National Policy

10.98 The policy is consistent with national policy as it defines the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and make it clear which uses will be permitted in such locations. This is consistent with Paragraph 23 of the NPPF.

VC4 Hot Food Takeaways

10.99 The Council is becoming increasingly concerned by the high number and over concentration of hot food takeaways in particular parts of the city. The policy seeks to manage the development of new hot food takeaways in order to protect the vitality and viability of centres and to restrict hot food takeaways in close proximity to schools and in wards with the highest rates of childhood obesity.

VC4 Hot Food Takeaways

1. Development for hot food takeaways (Use Class A5) will be managed to ensure the vitality and viability of designated centres by:
 - i. resisting development of further hot food takeaways in the Primary Frontages of the City Centre;
 - ii. restricting development for a hot food takeaway use at ground floor level if the unit has been vacant for less than 24 months unless:
 - a. the proportion of units accounted for by A5 uses in each thoroughfare, or centre, does not exceed x% [with x defined through reference to Table 1];
 - b. the proportion of the length of frontage in each thoroughfare, or centre, accounted for by A5 uses does not exceed y% [with y defined through reference to Table 1];
 - c. there will be no more than z% of consecutive A5 units in each thoroughfare, or centre [with z defined with reference to Table 1]; and
 - iii. if the unit has been vacant for more than 24 months, development for hot food takeaway use at the ground floor level will be considered favourably where:
 - a. it has been marketed for 24 months for other main town centre uses (particularly those in Use Classes A1, A2, A3 and A4), but without success;
 - b. the proposal would not have an adverse impact upon local amenity and include the provision of appropriate extraction equipment; and
 - c. the proposals would not be detrimental to highway safety.
2. To promote healthier communities, the council will:
 - i. prevent the development of hot food takeaways (Use Class A5) within a 400m radius of entry points to all primary and secondary schools; and
 - ii. prevent the development of hot food takeaways in wards where the prevalence of obesity is more than 21% for year 6 pupils or 10% for reception pupils.

Positively Prepared

Vision and Strategic Priorities

10.100 This policy will deliver the spatial vision by helping to ensure that Sunderland is healthy, safe and prosperous, where people have the opportunity to fulfil their aspirations; create vibrant and well supported town, district and local centres that are places to meet as well as shop; and also help to ensure that the Urban Core is revitalised and becomes a destination of choice, a place for people to live, work and spend their leisure time.

10.101 Policy VC4 will help to deliver Strategic Priorities 2, 3 and 6

Draft Plan Comments

10.102 As set out in the Consultation Statement (SD.7)³⁴³, the following issues were raised during the draft Plan consultation;

- Resident opposes the over concentration of hot food takeaways in centres

³⁴³ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Sunderland Civic Society would like the policy to be updated to limited hot food takeaways in close proximity to schools.

How Issues Have Been Taken into Account at Publication Draft

10.103 The Plan has been updated to include restrictions for hot food takeaways within 400m of an entrance point to a school.

Publication Draft Comments

- 10.104 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;
- Kentucky Fried Chicken (PD256) suggest Policy VC4 is not based on objective evidence; does not take account of healthy options; and is not clear how the policy will be monitored.
 - Planware Ltd (PD1147) suggest the NPPF provides no justification to use planning to seek to influence people's dietary choices and there is no adequate evidence to justify the assumption that locating A5 uses within certain distances of schools or designated centres causes adverse health consequences.
 - Siglion (PD2849) suggest 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.
 - Urban and Civic (PD937) assert that the policy could prevent Class A5 uses being brought forward, based on a review of current levels of obesity in the wards surrounding a site. As A5 uses (in the consultee's opinion) are widely regarded as "main Town Centre uses" this could have a detrimental impact to the proposal at Houghton Colliery.

How issues have been taken into account prior to Submission

10.105 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by KFC (PD256), Planware (PD1147), Siglion (PD2849), and Urban and Civic (PD937), the Policy is consistent with the evidence base and recommendations of the Sunderland Retail Needs Assessment (2016) and Public Health evidence in relation to the use of the planning system to control hot food takeaways (2018).

Duty to Cooperate (SD.11)

10.106 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy

Sustainability Appraisal (2017) (SD.12)

10.107 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

10.108 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)³⁴⁴

10.109 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	+	~	~	-	+	+	~	~	+	~	~	~	+

10.110 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

10.111 The Council is becoming increasingly concerned over the high concentration of hot food takeaways present within many of our designated centres, with the proportion of hot food takeaways within some centres exceeding 20% of total units (see Sunderland Retail Needs Assessment Volume 3: Technical Paper 2; Table 2; pg. 4) (SD.41)³⁴⁵. The Council is also growing increasingly concerned regarding the prevalence of hot food takeaways more widely within the city, with the latest data from Public Health England showing the local authority as having the 21st highest concentration of fast food outlets per 100,000 population in England³⁴⁶, and recently published data from the ONS showing an increase in 38 hot food outlets per 100,000 population in Sunderland between 2010 and 2017, which represents the 7th highest rate of increase in the UK during this period³⁴⁷. Furthermore, in 2015 Sunderland was not identified within the Royal Society of Public Health's (RSPH) Ten "unhealthiest" UK high streets³⁴⁸ however in the recent 2018 report "Health on the High Street: Running on Empty" (2018)³⁴⁹ Sunderland is now 5th in the Ten "unhealthiest" UK high streets. This clearly demonstrates that the number and concentrations of hot food takeaways within Sunderland is a significant issue.

10.112 An over-concentration of hot food takeaways can have a detrimental impact upon the vitality and viability of centres, by reducing the diversity of uses within a centre and also due to their hours of operation, often results in inactive and often shuttered frontages during daytime trading hours. They can also give rise to complaints about noise, disturbance, odours and litter.

10.113 Technical Paper 2 of the Sunderland Retail Needs Assessment (Sunderland Retail Needs Assessment Volume 3 – Technical Papers) (SD.41)³⁵⁰ provides detailed evidence relating to the number and concentration of hot food takeaways within existing designated centres within Sunderland. The table below is taken from the Technical Paper and indicates the number and proportion of hot food takeaways and fast food restaurants within the designated centres in Sunderland.

³⁴⁴[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

³⁴⁵[https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

³⁴⁶<https://www.gov.uk/government/publications/fast-food-outlets-density-by-local-authority-in-england>

³⁴⁷<https://www.nomisweb.co.uk/datasets/idbrlu>

³⁴⁸ Royal Society of Public Health (2015) Health on the High Street, pp.11-12, Royal Society for Public Health, John Snow House, 59 Mansell Street, London E1 8AN

<https://www.rsph.org.uk/uploads/assets/uploaded/b6f04bb8-013a-45d6-9bf3d7e201a59a5b.pdf>

³⁴⁹ Royal Society of Public Health (2018) Health on the High Street, Running on Empty, pp. 13-15, Royal Society for Public Health, John Snow House, 59 Mansell Street, London E1 8AN

https://www.rsph.org.uk/uploads/assets/uploaded/dbdbb8e5-4375-4143_a3bb7c6455f398de.pdf

³⁵⁰[https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_\(2016\).pdf?m=636802957111630000](https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_(2016).pdf?m=636802957111630000)

Table 37 Survey Count of Hot-Food Takeaways and Fast-Food Restaurants in Sunderland

Name of Centre	No. of Takeaway Units	No. of Fast Food Restaurants	Proportion of Total Units (%)
City Centre			
Sunderland City Centre	17	2	4.5
Town Centres			
Washington	0	2	1.5
Houghton-le-Spring	8	0	8.2
District Centres			
Concord	14	0	15.4
Sea Road	5	0	4.7
Hetton	2	0	4.5
Southwick Green	10	0	11.9
Chester Road	6	0	7.1
Doxford Park	3	0	20.0
Local Centres			
Hylton Road	15	0	12.2
Pallion	8	0	12.5
Grangetown	6	0	10.3
Ryhope	6	0	15.3
Hendon	5	0	13.5
Pennywell	2	0	11.7
Silksworth	5	0	13.5
Thorndale Road	3	0	27.3
Shiney Row	4	0	14.8
Easington Lane	6	0	20.5
Market Street, Hetton	5	0	18.5
Fencehouses	5	0	19.2
Monkwearmouth	9	0	11.0
Castletown	2	0	11.8

Source: Sunderland Retail Needs Assessment 2016: Volume 3 – Technical Papers; Technical Paper 2; Table 2; pg 4.

10.114 As seen above, some of the designated centres within Sunderland already have a significant concentration of hot food takeaways within them. The Council is seeking to support a diversity of uses within designated centres in order to support their vitality and viability. In order to guard against an over-provision of hot food takeaways within our designated centres, either in terms of the overall number present or the clustering of such uses, the policy seeks to limit the number and clustering of hot food takeaways. The policy is consistent with the recommendations of the Retail Needs Assessment – Volume 1 (Paragraphs 9.54 to 9.59; pp 154-163) (SD.39³⁵¹) and has been informed through consideration of similar policies adopted by other local planning authorities and the research and findings presented within Technical Paper 2 of the Retail Needs Assessment (SD.41³⁵²).

10.115 The Council considers that the thresholds set out within Table 1 of the Plan are proportionate and are consistent with the recommendations of the Sunderland Retail Needs Assessment (2016; Para 9.56). These recommendations were arrived at having reviewed

³⁵¹[https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=63680295631360000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-/pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=63680295631360000)

³⁵²[https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_\(2016\).pdf?m=636802957111630000](https://www.sunderland.gov.uk/media/20884/SD-41-Sunderland-Retail-Needs-Assessment-Volume-3-2016-/pdf/SD.41_Sunderland_Retail_Needs_Assessment_Volume_3_(2016).pdf?m=636802957111630000)

the policy approach adopted by 21 other Local Planning Authorities in the North, North-West, West Midlands and London, as well as drawing on local fieldwork and discussions with stakeholders. The Plan recognises the importance of the Primary Shopping Area of Sunderland City Centre as the retail core and therefore seeks to protect the predominance of A1 retail uses within it. It is therefore proposed that no further hot food takeaways are permitted in this area unless the exceptions test is met. The thresholds for district and local centres are higher in recognition that a wider diversity of uses are required to protect the vitality and viability of these centres, including an appropriate mix of hot food takeaways.

- 10.116 Whilst preventing an over-concentration of hot food takeaways within designated centres is important, the Council also recognise that bringing a long term vacant property back into use can be beneficial to the vitality and viability of a centre. In circumstances where a unit has been vacant for a continuous period of more than 24 months despite active marketing during the period of vacancy at a reasonable price, the policy provides flexibility that will allow such units to be brought back into active use as a hot food takeaway, where it would satisfy all other material planning considerations.
- 10.117 It is recognised that the policy recommendations contained within Paragraph 9.55 of the Sunderland Retail Needs Assessment (2016) (SD.39) provided the Council with a range of 6 to 24 months which could be utilised within the policy, as the period of vacancy which would be required before favourably considering planning applications for hot food takeaways, however due to the high numbers of hot food takeaways already present within some of our designated centres (as set out in the table above), the Council considered that it was necessary to utilise the top end of this range.
- 10.118 In addition to concerns over the impact that an over-proliferation can have on the vitality and viability of designated centres, the Council is becoming increasingly concerned over the impacts that hot food takeaways can have upon the health and wellbeing of our residents.
- 10.119 The PPG (Paragraph: 006 Reference ID: 53-006-20170728) seeks to assist local planning authorities in creating healthier consumption choices and indicates that, where supported by an evidence base, local plans can include policies which limit the proliferation of certain use classes identified in certain areas, where planning permission is required. In this regard, the PPG indicates that local planning authorities could have particular regard to the proximity to locations where young people congregate and where there is evidence indicating high levels of obesity, deprivation and general poor health in specific locations.
- 10.120 In order to consider the impacts of the Plan upon health, the Council prepared a Health Impact Assessment for the draft Plan (SD.19³⁵³). This was published alongside the Draft Core Strategy and Development Plan in 2017. Whilst the Health Impact Assessment recognised that the policies of the plan were broadly positive in terms of their health impacts, the report did make a number of recommendations on how the plan could further be improved to enhance the positive benefits of the plan upon health.
- 10.121 When preparing the Publication Draft of the Plan, the Council considered each of the recommendations of the Health Impact Assessment in turn and where possible, made amendments to the Plan to address the recommendations made. In June 2018 the Council

³⁵³[https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_\(2017\).pdf?m=636803846820730000](https://www.sunderland.gov.uk/media/20967/SD-19-Health-Impact-Assessment-2017-/pdf/SD.19_Core_Strategy_and_Development_Plan_Health_Impact_Assessment_(2017).pdf?m=636803846820730000)

published a Health Impact Assessment Note (SD.20³⁵⁴) which set out how each of the recommendations of the Health Impact Assessment had been taken into consideration when preparing the Publication Draft of the Plan. This document forms part of the evidence base for the Plan.

- 10.122 Recommendation 3 of the Health Impact Assessment (2017; pg. 4) (SD.19) indicated that the Plan should consider working with outlets to make the healthier choice the easier choice and a population-level (cumulative impact) policy that takes into account the risks to the health of children and young people by outlets sites close to schools.
- 10.123 It was originally intended that further guidance on hot food takeaways would be provided within a standalone hot food takeaway Supplementary Planning Document, but following the recommendations of the Health Impact Assessment, discussions with the Council's Public Health Team and responses received during the consultation on the draft CSDP, it was decided that it would be more logical to improve the policy to also cover health impacts.
- 10.124 The 'Public Health evidence in relation to the use of the planning system to control hot food takeaways' report (2018) (SD18³⁵⁵) provides detailed evidence regarding the concentrations of hot food takeaways within the city, the linkages between deprivation and childhood obesity rates and also regarding the nutritional values of various forms of hot food takeaway, based on survey work.
- 10.125 Appendix 2 of the report (pg26-28) (SD.18) provides detailed nutritional analysis of a range of food types purchased from hot food takeaways in Gateshead. The graphs clearly demonstrate that the nutritional content of the food sampled was high in calories, salt, total fat, saturated fat and sugars, all of which are contributory factors to obesity. Indeed in many cases, the levels present within one portion of the food sampled exceeded the Government's recommended daily intake.
- 10.126 During the last decade in the United Kingdom (UK), consumption of food away from the home has increased by 29%, whilst the number of takeaways or fast food outlets has increased significantly (Burgoine et al 2014). The Nutrition Policy Unit of London Metropolitan University found that food outlets in close proximity to, and surrounding, schools were an obstacle to secondary school children eating healthily³⁵⁶. Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight was investigated in Cambridgeshire³⁵⁷. The study showed an environmental contribution to the consumption of takeaway foods, and especially to body mass index and the odds of being obese in this sample. A further UK based empirical study found that exposure to takeaway food outlets was positively associated with consumption of takeaway food, particularly around the school and workplace (Burgoine et al., 2014). More recent research undertaken by Hamano et al (2017)³⁵⁸ looked at the "Association between Childhood

³⁵⁴[https://www.sunderland.gov.uk/media/20968/SD-20-Health-Impact-Assessment-Note-2018-pdf/SD.20_Health_Impact_Assessment_Note_\(2018\).pdf?m=636803847545670000](https://www.sunderland.gov.uk/media/20968/SD-20-Health-Impact-Assessment-Note-2018-pdf/SD.20_Health_Impact_Assessment_Note_(2018).pdf?m=636803847545670000)

³⁵⁵https://www.sunderland.gov.uk/media/20856/SD-18-Public-Health-Evidence-in-Relation-to-the-use-of-the-Planning-System-to-Control-Hot-Food-Takeaways-2018-pdf/SD.18_Public_Health_Evidence_in_Relation_to_the_use_of_the_Planning_System_to_Control_Hot_Food_Takea.pdf?m=636803047690030000

³⁵⁶ Sarah Sinclair and Jack Winkler (2008). The School Fringe: What pupils buy and eat from shops surrounding secondary schools. Nutrition Policy Unit. London Metropolitan University, http://www.fhf.org.uk/meetings/2008-07-08_School_Fringe.pdf

³⁵⁷ Burgoine, T. et al, (2014). Associations between exposure to takeaway food outlets, takeaway food consumption, and body weight in Cambridgeshire, UK: population based, cross sectional study. *BMJ* 2014;348:g1464. www.bmj.com/content/348/bmj.g1464

³⁵⁸ Hamano T, Li X, Sundquist J, Sundquist K. (2017) Association between Childhood Obesity and Neighbourhood Accessibility to Fast-Food Outlets: A Nationwide 6- Year Follow-Up Study of 944,487 Children. *Obesity Facts*, Nov 22; 10 (6): 559-568.

Obesity and Neighbourhood Accessibility to Fast Food Outlets” this nationwide 6-year follow-up study of 944,487 children. The study showed that the neighbourhood accessibility to fast-food outlets was independently associated with increased prevalence of diagnosed childhood obesity. There is also evidence that there are elevated levels of obesity in communities with high concentrations of fast food outlets (Zenk et al 2009)³⁵⁹.

- 10.127 The Royal Society of Public Health report (RSPH, 2015) referenced earlier, summarised the link between frequent Fast Food Outlets (FFO) and various health indicators and outcomes such as BMI, weight gain, insulin resistance, and high blood pressure. Recent research based on a sample of 50,000 UK adults by Burgoine et al (2018)³⁶⁰ supports this suggesting an association between FFO exposure, fast food consumption and obesity. Furthermore, a survey of 2,500 secondary school students in Brent³⁶¹ demonstrated that schools with FFOs within a 400m radius were more likely to be accessed at least once a week (62%) than those at schools with no FFOs within 400m.
- 10.128 There is also evidence that the type of food on sale nearest to schools may influence the diet of schoolchildren. (Engler- Stringer, 2014; Smith, 2013)³⁶². The Local Government Association document “Tipping the Scales”³⁶³ provides case studies of seven local authorities which have developed policies and supplementary planning documents with this above objective. The document complements previous publications by Public Health England (PHE), the Chartered Institute of Environmental Health (CIEH) and the LGA which describes the policy, the evidence and the legislative background (PHE, 2014).
- 10.129 Obesity is a particularly acute issue within Sunderland. The latest published evidence shows that childhood obesity rates for Reception age pupils within the city (11.4%) are above the national average (9.5%) and that for Year 6 pupils the obesity rates in Sunderland (25%) are significantly higher than both the national (20.1%) and regional (22.8%) averages. The recent National Childhood Measurement Programme data demonstrates a year on year increase in overweight and obesity amongst school aged children in Sunderland as demonstrated in Figure 27.

³⁵⁹ [Zenk SN, Schulz AJ, Odoms-Young AM \(2009\). How neighbourhood environments contribute to obesity. The American Journal of Nursing, Jul;109\(7\):61-4:](#)

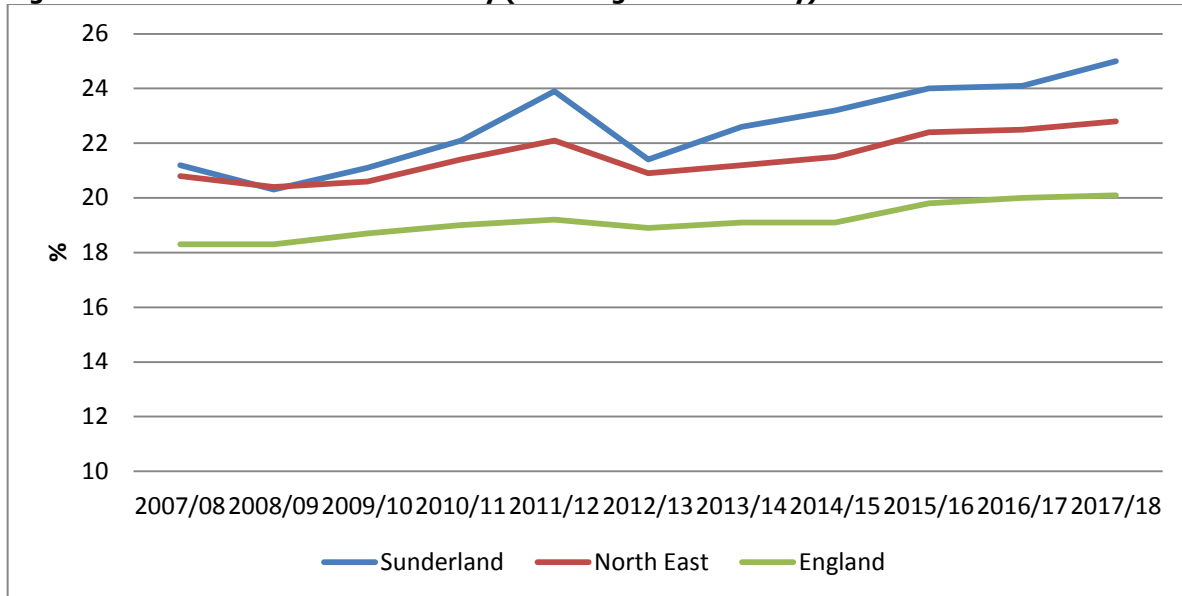
³⁶⁰ Burgoine, T., Sarkar, C., Webster, C.J., Monsivais, P., 2018. Examining the interaction of fast-food outlet exposure and income on diet and obesity: evidence from 51,361 Biobank participants, *International Journal of Behavioural Nutrition and Physical Activity*,15(1):71 doi: 10.1186/s12966-018-0699-8.

³⁶¹ Takeaway use among Brent’s school students, June 2014, Brent Council, <https://www.brent.gov.uk/media/16403699/d26-takeaway-use-brent-school-students.pdf> (accessed 19.11.180)

³⁶² Engler-Stringer, R., Le, H., Gerrard, A. and Muhajarine, N. (2014), ‘The community and consumer food environment and children’s diet: a systematic review’ in *BMC Public Health* 2014, 14:522:

³⁶³ Local Government Association (2017) *Tipping the Scales, Case studies on the use of planning powers to limit hot food takeaways*, Local Government Association. <https://www.local.gov.uk/tipping-scales-case-studies-use-planning-powers-limit-hot-food-takeaway>

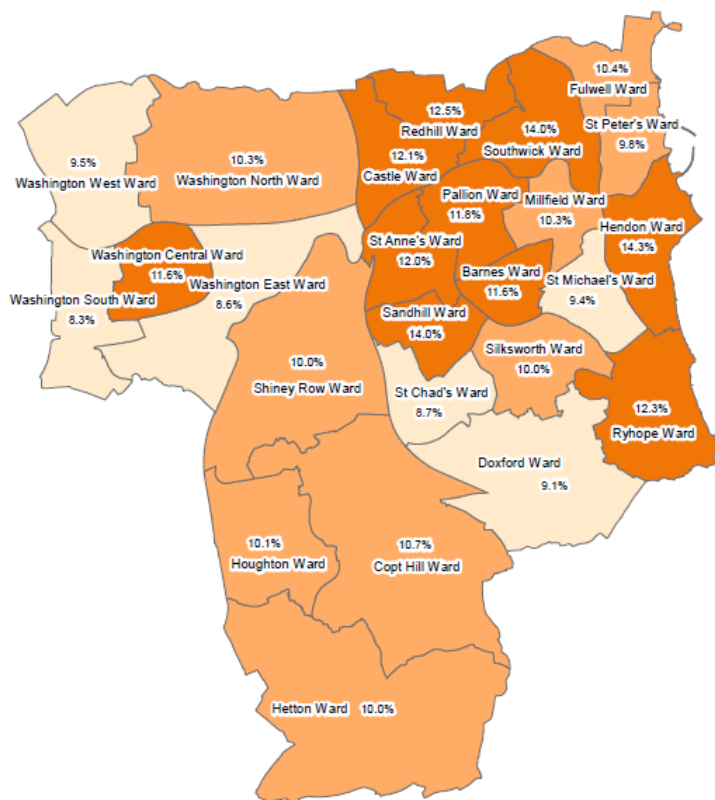
Figure 48: Year 6 - Prevalence of obesity (including severe obesity)



Source: NHS Digital, National Child Measurement Programme (NCMP) 2017/18

10.130 Notwithstanding the average childhood obesity rates within Sunderland being significantly higher than the national average, there are wards within the city that have particularly high rates of childhood obesity, as shown in **Figures 49 and 50**.

10.131 In addition to childhood obesity, excess weight in adults (18+) is also an issue within Sunderland, with 67.7% of adults considered to have excess weight. This is considerably higher than the national average of 61.3%³⁶⁴:



% Obese in Reception
Wards
% Reception Obese
 8.30 - 9.50
 9.51 - 10.70
 10.71 - 14.30

Source: PHE NCMP Prevalence of overweight and obesity by area of child residence (modelled) Electoral Ward (2015)

Figure 49 Prevalence of obesity in Reception (4 and 5 years) 2013/15 – 2015/16

Source: PHE NCMP Prevalence of overweight and obesity by area of child residence (modelled) Electoral Ward (2015)

³⁶⁴ <https://fingertips.phe.org.uk/profile/health-profiles/area>

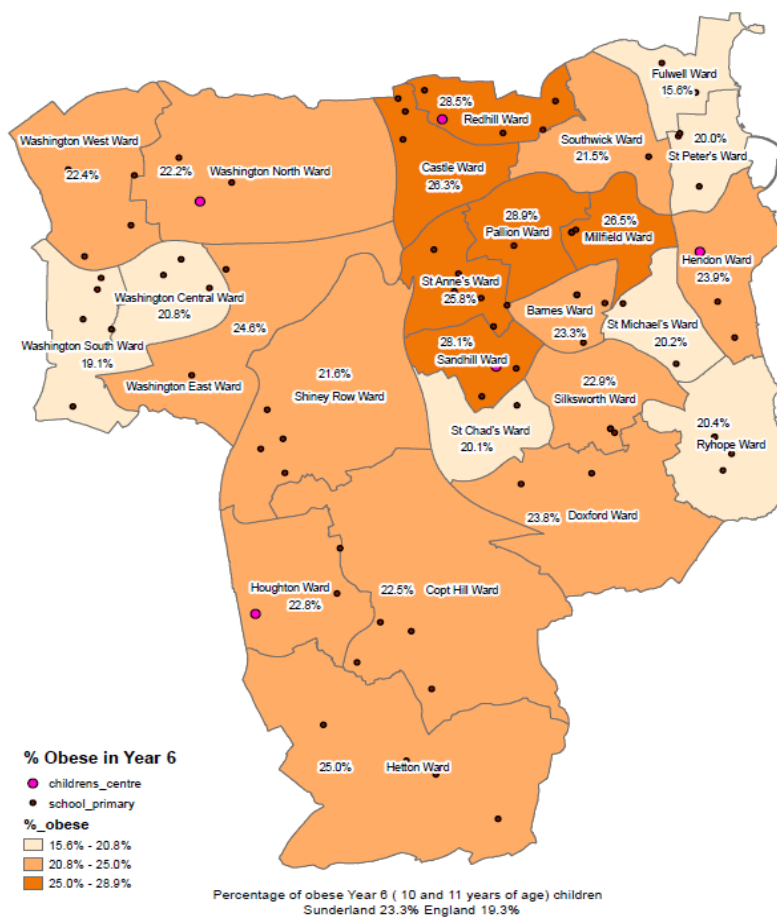


Figure 50 : Prevalence of obesity in year 6 (10 and 11 years) 2013/ 15 – 2015/ 16

Source: PHE NCMP Prevalence of overweight and obesity by area of child residence (modelled) Electoral Ward (2015)

10.132 In order to assist in the improvement of health and wellbeing for residents of the city and in particular the city's children, the policy seeks to restrict the opening of new hot food takeaways within walking distance (400m) of entry points of schools and also within the wards which currently have the highest childhood obesity rates. Map 3 (pg22) of the Public Health evidence report (SD.18) clearly indicates the 400m buffers zones from entry points to schools and the areas that would be affected. It should be noted that 198 of the 329 hot food takeaways plotted on the map³⁶⁵ already fall within the 400m buffer zones; therefore there is already considerable competition and choice in these areas. The policy will only seek

to restrict further new hot food takeaways within these buffer zones. The Council has chosen a 400m buffer as this is outlined within the Urban Design Compendium 2 and the Institute of Highways and Transport Guidelines for providing journeys on foot as a reasonable walking distance. Given the length of school break times, this is considered to be an appropriate distance to buffer for new takeaway developments.

10.133 The National Institute for Clinical Excellence (NICE) made reference to the need to control takeaway numbers and their location. The Public Health Guideline on Cardiovascular disease prevention (PH25)³⁶⁶ recommendation 11 calls for action to encourage local planning authorities to restrict planning permission for take-aways and other food retail outlets in specific areas (for example, within walking distance of schools). This is supported by Barton, H., et al., (2003)³⁶⁷ research on takeaway accessibility thresholds, Shaping Neighbourhoods, for local health and global sustainability, which shows that over 75% of all journeys of under 400m are done by foot suggesting most people (including teenagers) will walk 400m with ease and anything within a 400m limit could be described as 'highly accessible'. A further paper by Smith et al (2013)³⁶⁸ demonstrated significant positive relationships between the distances travelled to food outlets and healthy diet scores, suggesting that the local food environment around secondary schools may influence adolescent diet.

³⁶⁵ Please note that only 329 of the 340 hot food takeaways in the city are plotted on the map, as coordinates were not available for the remaining 11 takeaways.

³⁶⁶ NICE (2010), Cardiovascular disease prevention, Public Health Guideline [PH25]. June 2010.

<https://www.nice.org.uk/guidance/ph25/chapter/1-recommendations>

³⁶⁷ Barton, H., et al., (2003) Shaping Neighbourhoods, for local health and global sustainability, Routledge, London

³⁶⁸ Smith D, Cummins S, Clark C, Stansfeld S (2013) Does the local food environment around schools affect diet? Longitudinal associations in adolescents attending secondary schools in East London *BMC Public Health* 2013, 13:70 <https://doi.org/10.1186/1471-2458-13-70>

- 10.134 More recently, the RSPH's Health on the High Street report 'Running on Empty' report (2018), made a number of recommendations to address unhealthy environments including:
- Introducing planning restrictions within 400m of primary and secondary schools;
 - For the Ministry of Housing, Communities and Local Government (MHCLG) to provide local authorities with the power and support to restrict the opening of new unhealthy eating outlets where there are already clusters;
 - A call for industry and all businesses selling food on the high street – fast food outlets, cafes, pubs, centres – to reduce the calories in their products.
- 10.135 Whilst the Council are seeking to control the number of hot food takeaways within the city in order to help improve the health and wellbeing of residents, it is also recognised that the policy must be proportionate, to ensure that the policy carefully balances health and wellbeing considerations against the need to support economic growth and consumer choice in the market. The Council considers that the thresholds set within the policy are proportionate as they are broadly consistent with national average childhood obesity rates, therefore only those wards which currently have childhood obesity rates above the national average would be affected.
- 10.136 The Council recognises that the hot food takeaway policy only comprises one small component of the overall approach to tackling obesity levels and improving health outcomes for the city's residents. Health is a cross-cutting issue across planning and connects into many areas within the Local Plan and other policies and strategies. This is because the wider determinants of health have multiple dimensions across the economy, environment and society. The Plan also contains a number of other policies which seek to promote healthy lifestyles, improve accessibility to sport and recreation facilities and promote active travel choice. The Council are working with partners to deliver the Health and Wellbeing Board's, Health and Wellbeing Strategy (SD.17³⁶⁹) and the Public Health Team are in the final stages of developing the draft Public Health Team Strategy 2018.

Reasonable Alternatives

- 10.137 There is increasing concern over the number and concentration of hot food takeaways within the designated centres of Sunderland. Not including a policy to control the concentration of hot food takeaways was considered, but due to concerns over the impact that such uses are already having on the vitality and viability of centres, this was not considered to be appropriate as it could lead greater concentrations of hot food takeaways and weaken the diversity of uses within centres, further eroding their vitality and viability.
- 10.138 Consideration was given to whether to include detailed health considerations as part of the policy within the Plan, or whether this detail would be more appropriate within a Supplementary Planning Document. Due to the high levels of obesity present within the city and the recommendations of the Health Impact Assessment, it was considered that it would be most appropriate to include health considerations in the Plan. This ensures that stakeholders have the opportunity to engage the proposals at an early stage, that the proposals are subject to independent scrutiny during the Examination in Public and will also ensure that there is no delay in their introduction, which would inevitably have been the case if the issue was deferred until after the adoption of the Plan as a Supplementary Planning Document.

³⁶⁹https://www.sunderland.gov.uk/media/20855/SD-17-Sunderland-s-Joint-Health-and-Wellbeing-Strategy/pdf/SD.17_Sunderland's_Joint_Health_and_Wellbeing_Strategy.pdf?m=63680293965550000

Effective Deliverable

10.139 The policy will apply to any proposals for new hot food takeaways within designated centres, within 400m of the entrance point of a school, or in wards with higher rates of childhood obesity than 10% for Reception pupils and 21% for Year 6 pupils. The policy will be delivered through the determination of planning applications. Childhood obesity rate data is gathered as part of the National Childhood Measurement Programme and is available on request from the Council’s Public Health Team.

10.140 With regard to the impact upon the vitality and viability of centres, the policy allows a degree of flexibility with regard to long term vacant units (24 months or more). The applicant will be expected to provide evidence of marketing for other main town centre uses for at a realistic market value for a period of at least 24 months in support of any planning application that seeks to demonstrate compliance with this part of the policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC4	Hot food takeaways	To protect retail vitality and viability from increases in A5 hot food takeaways and to promote healthier communities	<ul style="list-style-type: none"> >50% increase in the number of planning applications for A5 uses granted within designated shopping centres >50% increase in the number of applications for A5 uses within 400m of the entry points of all schools >50% increase in the number of applications for A5 uses within a ward where obesity is prevalent 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Update the retail evidence base 	<ul style="list-style-type: none"> Number of A5 hot food takeaway units in designated centres Number of frontages exceeding the table 1 threshold in designated centres Numbers and percentages of vacant retail units and floorspace (gross and net sales sqm) in designated city, town, district and local centres Number of permissions granted for A5 use contrary to policy Obesity levels in year 6 and reception age pupils by ward 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Retail Health & Capacity Studies LA Health Profiles Public Health England Outcome Frameworks

Consistent with National Policy

10.141 The policy is consistent with national policy as it recognises town centres as the heart of their communities and will support their vitality and viability in accordance with Paragraph 23 of the NPPF. The policy is also consistent with Paragraph 69 of the NPPF which seeks to create healthy and inclusive communities.

VC5 Protection and Delivery of Community Facilities and Local Services

10.142 This policy aims to protect and deliver community facilities and local services through resisting their loss supporting the development, extension and sharing of existing facilities.

Community facilities and local services will be protected and enhanced by:

1. resisting their loss, unless a replacement facility that meets the needs of the community is provided, or the community facility is no longer required in its current use and it has been demonstrated that it is not suitable for any other community uses;
2. supporting development of new and extended community facilities. Developments for new community facilities should be located in accessible neighbourhood and centre locations; and
3. supporting the shared use of facilities, provided that it can be demonstrated that such shared use will not adversely affect the level of social and community provision.

Positively Prepared

Vision and Strategic Priorities

10.143 This policy will deliver the spatial vision by improving social infrastructure, with additional healthcare, education and community facilities.

10.144 Policy VC5 will help to deliver Strategic Priorities 1 and 3.

Draft Plan Comments

10.145 As set out in the Consultation Statement (SD.7)³⁷⁰, the following issues were raised during the draft Plan consultation;

- Theatre Trust supports the policy.
- South Tyneside Council requested further work to consider growth agenda on hospitals.
- Sport England were concerned that policy does not protect sport facilities.
- Herrington Working Men's Club and Institute and Esh requested the policy is changed to reflect the NPPF.
- Developers including Taylor Wimpey and Hellens requested that the requirement for developers to contribute/make provision towards community facilities is onerous.
- Historic England supports the policy.

How Issues Have Been Taken into Account at Publication Draft

- Council has held discussions with local hospitals and updated the IDP accordingly.
- The plan has been updated to ensure that Greenspaces which includes sport facilities are protected.
- In response to the developers' comments, Policy VC5 has been updated and no longer includes requirements.

Publication Draft Comments

10.146 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- The Theatres Trust (PD223) support the Policy as it will provide protection for Sunderland's valued social, community and cultural facilities.

³⁷⁰ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- NHS Sunderland CCG (PD71 & PD72) supports the Policy as drafted and in particular the reference to 'delivery' – but suggest specifically referencing the delivery of health infrastructure within the Policy.

How Issues Have Been Taken into account prior to Submission

10.147 In response to NHS Sunderland CCG (PD71 & PD72), The Draft Infrastructure Delivery Plan (2018) and Draft Planning Obligations SPD (2018) have been prepared to support the delivery of the Plan. These outline the necessary supporting infrastructure required to support the growth proposed and the Council's approach to planning obligations.

10.148 Paragraph 8.32 of the Plan (2018: p75) includes examples of community facilities such as education, health care and family support. A definition of 'community facilities' is included in the CSDP glossary. The description references health care, childcare, cultural and social services.

10.149 The Council has proposed additional modifications as set out in the Schedule of Modifications (M44, M91). These include cross-referencing this Policy to SP7 Healthy and Safe Communities and including a definition of Local Services in the glossary.

Proposed Modifications to the Publication Draft

10.150 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
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 (<u>SP7</u>) and family support. It is therefore important that these facilities are protected where possible.	To address representations submitted by NHS Sunderland Clinical Commissioning Group (PD72).
Glossary	<u>Local Services</u> A facility that provides a valuable local service to the community such as a small convenience store, post office or public house.	To address representations submitted by NHS Sunderland Clinical Commissioning Group (PD71 and PD72).

Duty to Cooperate (SD.11)³⁷¹

10.151 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy

Sustainability Appraisal (2017) (SD.12)³⁷²

10.152 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

³⁷¹[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

³⁷²[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

10.153 The SA (SD.12) made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)³⁷³

10.154 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	++	++	++	~	±	~	~	~	±	~	++	~

10.155 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

10.156 This policy is required to support strong, sustainable and cohesive communities by protecting community facilities and local services. This is particularly important in more rural areas of the city and for members of the community who have limited mobility. Community facilities and local services provide opportunities to meet and access essential services such as education, health care and family support. Paragraph 17 the NPPF (2012) encourages Local Authorities to take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. Additionally, in Paragraph 28 of the NPPF (2012), Local Plans are encouraged to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. This policy seeks to meet the requirements of the NPPF.

10.157 Sunderland’s future growth and environmental sustainability cannot be achieved without a range of essential infrastructure. The IDP (2018) (SD.59³⁷⁴) has been prepared to support the delivery of the Plan. It outlines the necessary supporting “infrastructure” required to support the growth proposed in the Plan. It should be noted that the IDP (2018) (SD.59) principally identifies high level strategic infrastructure and does not include site specific infrastructure requirements, which will be dealt with through individual planning applications. The Council will work with its partners to ensure that much needed infrastructure, including community facilities and services are provided for local communities. The Draft Planning Obligations SPD (2018) (SD.63³⁷⁵) was consulted on as part of the same public engagement strategy as the Plan and sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute.

10.158 Policy VC5 aims to protect and enhance community facilities and local services. Part 1 specifies this will be done through resisting their loss unless it can be demonstrated they are no longer required or the facility is not suitable for any other community uses. Part 2 outlines the Council’s support for the development and extension of community facilities and the preference for these to be located in accessible locations. Part 3 supports the shared use of community facilities where appropriate.

³⁷³[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)
³⁷⁴[https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)
³⁷⁵[https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_\(2018\).pdf?m=636803113837800000](https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_(2018).pdf?m=636803113837800000)

- 10.159 The Draft Planning Obligations SPD (2018) (SD.63) 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.
- 10.160 The Council has opted not to reference to any specific type of community facility within Policy VC5. Paragraph 8.32 of the Plan (2018: p75) includes examples of community facilities such as education, health care and family support. The term ‘community facilities’ is also included in the glossary. The description references health care, childcare, cultural and social services.
- 10.161 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 as intend. The Council considers the policy to be sound.

Reasonable Alternatives

- 10.162 The Council consider there are no reasonable alternatives.

Effective Deliverable

- 10.163 The development of new and enhancement of existing community facilities will be delivered as outlined in the Draft Planning Obligations SPD (2018) (SD.63). This SPD sets out the mechanism through which community facilities and local services will be delivered and the thresholds above which developers/landowners must contribute. This will be done through the determination of planning applications. The Council will secure planning obligations from new development within the city via Section 106 of the Town and Country Planning Act 1990 (as amended) (SD.63) in order to mitigate the impact of new development and to ensure the development is acceptable in planning terms. The Council will also resist the loss of community facilities and local services unless the policy tests are met, supporting the development of new and extended community facilities and supporting the shared use of facilities.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC5	Protection and delivery of community facilities and local services	Ensure the protection of existing facilities and where new facilities are proposed ensure they are in the right locations and accessible	<ul style="list-style-type: none"> Significant loss of community, social and cultural facilities 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify projects/interventions to address issues 	<ul style="list-style-type: none"> Community, social and cultural development – D1 and D2 units and floorspace (sqm) additions and losses 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications

Consistent with National Policy

- 10.164 A core land-use principle outlined in Paragraph 17 the NPPF encourages Local Authorities to take account of and support local strategies to improve health, social and cultural wellbeing

for all, and deliver sufficient community and cultural facilities and services to meet local needs. Additionally, in Paragraph 28 Local Plans are encouraged to promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

- 10.165 The policy is consistent with Paragraph 70 of the NPPF which requires the plan to deliver social, recreational and cultural facilities and services the community needs. The policy plans positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments. The policy also guards against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.

VC6 Culture, Leisure and Tourism

- 10.166 Policy VC6 aims to promote cultural, leisure and tourism proposals. This policy makes reference to several specific sites and schemes which will be supported by the Council.

VC6 Culture, Leisure and Tourism

1. Development of cultural, leisure and tourism proposals will generally be supported, particularly:
 - i. the development of Music, Arts and Culture proposals within the Minster Quarter, including a new auditorium;
 - ii. leisure and tourism proposals at Seaburn and Roker seafront;
 - iii. new hotel development in the Urban Core;
 - iv. the delivery of cinema and ancillary food and beverage units at Washington Town Centre;
 - v. the development of new sports hubs at Washington, Sunderland North and Sunderland South as part of the Football Association's Parklife programme;
 - vi. leisure development which contribute to healthy lifestyles; and
 - vii. the temporary and meanwhile use of vacant buildings and sites by creative, cultural and community organisations, particularly where they help activate and revitalise key city and Town Centre locations and the public realm.
2. Proposals for leisure uses on designated employment land will not normally be supported unless they satisfy the requirements set out in Policies EG1 and EG2 for Primary and Key Employment Areas.

Positively Prepared

Vision and Strategic Priorities

- 10.167 This policy will deliver the spatial vision and strategic priorities by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

Draft Plan Comments

- 10.168 As set out in the Consultation Statement (SD.7)³⁷⁶, the following issues were raised during the draft Plan consultation;
- Siglion supports the policy.
 - Theatre Trust supports the policy and requested the inclusion of temporary uses.
 - Historic England supports the policy.

How Issues Have Been Taken into Account at Publication Draft

- 10.169 To reflect the Theatre Trusts comments, Policy VC6 has been amended to support temporary use of redundant buildings by creative, cultural and community organisations.

³⁷⁶ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

Publication Draft Comments

10.170 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Historic England (PD102) supports the encouragement of temporary and meanwhile uses for vacant buildings, as noted in (vii).
- The Theatres trust (PD225) supports part 1 of the policy.
- Washington AFC (PD233) supports the Plan and the identification of the three football hubs, but suggests land is removed from the Green Belt to accommodate a new stand at Northern Area Playing Fields.
- Siglion (PD3103) 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.

How Issues Have Been Taken into account prior to Submission

10.171 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy.

10.172 The Council acknowledges the support from Historic England (PD102), Theatres Trust (PD225), Washington AFC (PD233) and Siglion (PD3103).

10.173 In response to Washington AFC (PD233), 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.

10.174 In response to Siglion (PD3103), 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.

Duty to Cooperate (SD.11)³⁷⁷

10.175 As set out in the Duty to Cooperate Statement (SD.11), no issues have been identified for this policy.

Sustainability Appraisal (2017) (SD.12)³⁷⁸

10.176 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
					?									

10.177 The SA (SD.12) made no recommendations for changes to be made to the Draft Plan.

³⁷⁷[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

³⁷⁸[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

Sustainability Appraisal (2018) (SD.5)³⁷⁹

10.178 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	++	++	++	++	++	+	~	~	~	+	~	++	~

10.179 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

10.180 It is important that needs for leisure, culture and tourism, amongst other town centre uses are met in full and are not compromised by limited site availability. Paragraph 23 of the NPPF (2012) encourages Local Authorities to: 'allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres'. The provision of a strong mix of leisure facilities plays a key role in maintaining the vitality and viability of individual centres, as such uses help to increase footfall, turnover and dwell times within centres, thereby making a significant contribution to both the daytime and evening economies.

10.181 Policy VC6 aims to promote cultural, leisure and tourism proposals. It is considered that leisure proposals should be determined in accordance with the retail hierarchy outlined in Policy VC1 as these are the most accessible locations by a wide range of transport options and provide the opportunity for linked trips. This policy makes reference to several specific sites and schemes which will be supported by the Council.

Policy VC6 1(i) – Development of the Minster Quarter

10.182 The Council is working with the Sunderland Music Arts and Culture Trust (MAC Trust) to support the delivery of new cultural developments within the Minster Quarter. This is outlined in the Minster Quarter SPD which was adopted by the Council in April 2017. The majority of the Minster Quarter falls within the Bishopwearmouth Conservation Area and houses a number of listed buildings of architectural and historic interest. It contains Sunderland Minster and the Empire Theatre – both Grade II* listed buildings – which act as a focal point for the Masterplan Area. Completed schemes such as the redevelopment of the Fire Station and committed developments such as the auditorium and dance school have highlighted the artistic and cultural interest in the area and the opportunity for regeneration. This provided the justification for the Masterplan which was developed through a collaborative process with statutory consultees, stakeholders, and local residents, whose contribution informed the direction of the Masterplan. The Council has since implemented public realm improvements to High Street West and Keel Square which provides an important gateway into the Minster Quarter and the area continues to attract culture, leisure and tourism proposals as well as other ancillary uses.

10.183 The Theatre Trust is supportive of the Minster Quarter SPD (SD.61)³⁸⁰ and development of a new auditorium with the MAC Trust. They express an interest in being involved in this development as well as the wider area. It is considered appropriate to identify this

³⁷⁹[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

³⁸⁰[https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_\(2018\).pdf?m=636803112052470000](https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_(2018).pdf?m=636803112052470000)

regeneration area in Policy VC6 due to its importance as a cultural destination within the city centre.

Policy VC6 1(ii) – Leisure and Tourism development at Seaburn and Roker

10.184 The coastline and beaches at Roker and Seaburn are some of Sunderland’s key assets and have long been identified as playing a key role in providing cultural tourism attractions. Recent Supplementary Planning Documents, the Seaburn Masterplan³⁸¹ adopted in 2011 and Marine Walk Masterplan³⁸² adopted in 2010, have guided development in this area with a number of bars and restaurants as well as public realm improvements along the seafront improving the image of the area as a leisure and tourism destination. The development of these SPDs was guided by an extensive public engagement strategy including surveys and workshops over a 6 weeks period across the city. Due to the area’s importance in leisure and tourism for the plan area, it is considered appropriate to identify it as a preferred location for this type of development as part ii of Policy VC6.

Policy VC6 1(iii) – New hotel development in Urban Core

10.185 The Sunderland Retail Needs Assessment (2016: pp60, 118) (SD.39)³⁸³ recognises that further hotel development within the city centre will add to the diversity of uses in the Urban Core and help prolong stays in the city centre. With reference to an extant permission for a hotel at Keel Square, the report suggests it will work in conjunction with the emerging Minster Quarter in retaining visitor expenditure and encourage longer stays which will have a positive impact on Sunderland City Centre’s overall profile, attractiveness and health (2016: p62) (SD). The successful redevelopment of the Vaux site will also assist in boosting patronage for the emerging hotel proposal near Keel Square and hotel at the Stadium of Light. Although there has been recent improvement in the provision of hotel accommodation within the City Centre, the Council recognises there has been a lack of hotels for a prolonged period of time. The Council agrees with the findings of the Sunderland Retail Needs Assessment (2016) (SD.39) that a new hotel development in the Urban Core would boost leisure and tourism and therefore considers it appropriate to specify as such in part 1(iii) of Policy VC6. Due to the accessibility of the Urban Core, this is considered to be the most suitable location for new hotel development.

Policy VC6 1(iv) – The delivery of cinema and ancillary food units in Washington Centre

10.186 The Sunderland Leisure Needs Study (2016) (SD.43)³⁸⁴ acknowledges the permission 13/02714/FUL for a multi-screen cinema and ancillary food, drink and retail development at Washington Town Centre. Though it was extant at the time the report was produced, this permission has since lapsed so it is considered necessary to include Policy VC6.1(iv) to provide policy support for cinema development in the this location as is recommended in the Sunderland Leisure Needs Study (2016) (SD.43). There is no requirement in quantitative terms for new cinema provision other than in this location.

Policy VC6 1(v) – Parklife Programme

10.187 Part 1(v) of Policy VC6 makes reference to the Parklife Football Hub Programme. This is a national programme, supported by the FA, Sport England and the Premier League, which is designed to offer an alternative and sustainable solution to the long term future of grass roots football. The FA and the Council reviewed a number of strategic sites across the city and concluded that 3 sites are most suited to deliver the requirements of the Funding Partners:

³⁸¹ https://www.sunderland.gov.uk/media/11091/Seaburn-Masterplan/pdf/Seaburn_masterplan_July_2011.pdf?m=634509925463330000

³⁸² <https://www.sunderland.gov.uk/media/7157/Marine-Walk-Masterplan/pdf/marinewalkmasterplan.pdf?m=634012244938570000>

³⁸³ [https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_\(2016\).pdf?m=636802956313600000](https://www.sunderland.gov.uk/media/20882/SD-39-Sunderland-Retail-Needs-Assessment-Volume-1-2016-pdf/SD.39_Sunderland_Retail_Needs_Assessment_Volume_1_(2016).pdf?m=636802956313600000)

³⁸⁴ [https://www.sunderland.gov.uk/media/20886/SD-43-Sunderland-Leisure-Needs-Study-2016-pdf/SD.43_Sunderland_Leisure_Needs_Study_\(2016\).pdf?m=636802957858500000](https://www.sunderland.gov.uk/media/20886/SD-43-Sunderland-Leisure-Needs-Study-2016-pdf/SD.43_Sunderland_Leisure_Needs_Study_(2016).pdf?m=636802957858500000)

- Community North Sports Complex, SR5 4BB
- Ford Quarry, SR4 0RW
- Northern Area Playing Fields, NE37 3HR

10.188 Each site will see considerable improvements for users, with a minimum of 3 full sized floodlit 3G pitches, changing pavilions with a minimum of 6 changing rooms, social/refreshment areas and car parking to accommodate at least 200 cars. One of the hub sites will also have a commercial health and fitness offer incorporated on site. This will help achieve Strategic Policy SP7 and encourage active and healthy lifestyles and improve the relatively poor health outcomes for the plan area.

10.189 Washington AFC submitted representations in support of the Plan and the identification of the three football hubs, but suggests their land at Northern Area Playing Fields adjacent to one of the proposed hubs is removed from the Green Belt to accommodate a new stand.

10.190 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 process.

10.191 A spectator stand and associated facilities would be considered a building, the construction of which is inappropriate in the Green Belt. An exception to this is the provision of appropriate facilities for outdoor sport and recreation, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. The spectator stand would not preserve the openness of the Green Belt and so can only be permitted if the applicant demonstrates there are very special circumstances which clearly outweigh any harm to the Green Belt as a result of the development.

Policy VC6 1(vi) – Leisure development that contributes to healthy lifestyles

10.192 The Council's Health and Wellbeing Strategy aims to achieve equity by providing access to excellent services enabling everyone being able to achieve their full health potential regardless of their personal circumstances. To achieve this there needs to be fair distribution of leisure resources and opportunities for health and recreation. Particular communities where health inequalities are most evident are most in need of access to leisure development which contributes to healthy lifestyles.

10.193 Sunderland has an attractive coast and easy-to-reach countryside and urban green spaces that provide opportunities for promoting an active lifestyle. The city's passion for sport and exercise should be nurtured and developed to ensure broader involvement with more wide reaching health impacts. To help achieve these aims the Council considers it sound to include part vi of Policy VC6 to encourage leisure development which promotes healthy lifestyles in line with the Health and Wellbeing Strategy (SD.17)³⁸⁵.

Policy VC6 1(vii) – Temporary and meanwhile uses

10.194 Part vii of Policy VC6 outlines the Council's support for the temporary and meanwhile use of vacant buildings and sites. Planning Practice Guidance published on 6 March 2014

³⁸⁵https://www.sunderland.gov.uk/media/20855/SD-17-Sunderland-s-Joint-Health-and-Wellbeing-Strategy/pdf/SD.17_Sunderland's_Joint_Health_and_Wellbeing_Strategy.pdf?m=636802939655500000

encourages the use of planning conditions to allow temporary planning permission on vacant land/buildings to enable use for a temporary period prior to any longer term regeneration plans coming forward (a meanwhile use) or more generally to encourage empty property to be brought back into use. This can benefit an area by increasing activity. Locally recent, temporary permissions have been granted for schemes such as By the River Brew Co. in Gateshead and Stack in Newcastle to great success. There are several large strategic sites within the plan area which could benefit from meanwhile uses, such as the Vaux site. An application has recently been granted permission for the Vaux site under reference 17/01848/FU4 for a period of 7 years for retail, restaurants/cafes, leisure amongst other sui generis uses such as ice rink(s), performance stage(s), outdoor cinema(s) and shipping containers. However, temporary and meanwhile uses can equally be applied to vacant shop units and empty properties to make inactive frontages more vibrant.

10.195 Policy VC6 has been amended to include part vii at the request of the Theatre Trust who made representation to the Draft Plan. Commenting on the Publication Draft, Historic England also supports the encouragement of temporary and meanwhile uses for vacant buildings, particularly in relation to the Sunderland Historic High Streets Heritage Action Zone.

Policy VC6 2 – Leisure use in Key Employment Areas

10.196 This part of Policy VC6 sets out that proposals for leisure uses within Key Employment Areas will not normally be supported unless they satisfy the requirements set out in policies EG1 and EG2. Further information and justification for this can be found within policies EG1 and EG2. Designated Centres are the primary location for leisure uses and will be supported within these areas in line with Policies VC1, SP9, VC2 and VC3.

Reasonable Alternatives

10.197 The Council consider there are no reasonable alternatives.

Deliverable

Effective

10.198 The policy will be delivered through the determination of planning applications. The Council will also work with partners including the MAC Trust, FA and Sport England to deliver the specific proposals referenced within the policy. Development will be guided by the aforementioned SPDs and Strategies prepared by the Council.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
VC6	Culture, Leisure and Tourism	Supports the development of cultural, leisure and tourism facilities and sets out where they would be considered acceptable	<ul style="list-style-type: none"> Failure to deliver development within the Music, Arts and Culture quarter – specifically a new auditorium. Failure to deliver 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review policy objectives with SCC Regeneration and Economic Development Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Completion of the specific proposed culture, leisure and tourism schemes Planning applications for leisure schemes on designated 	<ul style="list-style-type: none"> SCC Monitoring data Planning applications Sport England /FA

			<p>a new hotel in the Urban Core</p> <ul style="list-style-type: none"> • Failure to deliver a cinema in Washington Town Centre • Failure to deliver three sports hubs across the City 		<p>employment land – amount of lost employment land area (ha) and floorspace (sqm)</p>	
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Consistent with National Policy

10.199 The policy is consistent with national policy as it seeks to support the development of cultural, leisure and tourism developments to meet local needs, in accordance with Paragraphs 23 and 156 of the NPPF.

11. Built and Historic Environment

BH1 Design Quality

11.1 This policy aims to deliver high quality design in development through a collection of guidelines.

BH1 Design Quality

To achieve high quality design and positive improvement, development should:

1. create places which have a clear function, character and identity based upon a robust understanding of local context, constraints and distinctiveness;
2. maximise opportunities to create sustainable, mixed-use developments which support the function and vitality of the area in which they are located;
3. be of a scale, massing, layout appearance and setting which respects and enhances the positive qualities of nearby properties and the locality;
4. retain acceptable levels of privacy and ensure a good standard of amenity for all existing and future occupiers of land and buildings;
5. promote natural surveillance and active frontages, including the provision of appropriate lighting, to assist in designing out crime;
6. clearly distinguish between public and private spaces, including appropriate use of hard and soft boundary treatments which reflect the character of the area;
7. create visually attractive and legible environments through provision of distinctive high quality architecture, detailing, building materials;
8. 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;
9. maximise the opportunities for buildings and spaces to gain benefit from sunlight and passive solar energy;
10. not detract from established views of important buildings, structures and landscape features;
11. in the case of tall buildings, form a positive relationship with the skyline and topography of the site and the surrounding area;
12. create safe, convenient and visually attractive areas for servicing and parking which does not dominate the development and its surroundings;
13. maximise durability and adaptability throughout the lifetime of the development to accommodate a range of uses; and
14. meet national spaces standards as a minimum (for residential).

Large scale developments should be supported by detailed Masterplans or development frameworks, and where appropriate, design codes.

Positively Prepared

Vision and Strategic Priorities

11.2 This policy will deliver the spatial vision by; offering a mix of good quality housing, both market and affordable, of the types, sizes and tenures that meet the needs and demands of existing and future communities; and has a high quality natural, built and historic environment.

11.3 Policy SP1 will help to deliver Strategic Priorities 3, 7, 8 and 9.

Draft Plan Comments

11.4 As set out in the Consultation Statement (SD.7)³⁸⁶, the following issues were raised during the draft Plan consultation;

- Residents suggest that a colour scheme should be included when undertaking public realm works.

³⁸⁶ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Developers including Taylor Wimpey, Hellens, New Herrington Workmen’s Club, Persimmon and Esh suggest the policy is amended to not be overly restrictive and allow flexibility. They also object to the inclusion of national space standards and consider the Plan to be unviable. They also consider there is no evidence to justify the need for such a policy.
- Siglion and Historic England support the policy.

How Issues Have Been Taken into Account at Publication Draft

- In relation to the developers’ comments, the policy was reviewed and partly amended to make the approach less prescriptive. However, the Council has determined that it would be appropriate to introduce the nationally described space standards through the Plan. The viability assessment which has been prepared in support of the plan demonstrates that site viability should not be adversely affected by the introduction of space standards. More information is set out within the Council’s Internal Space Standards (SD.25³⁸⁷) report.

Publication Draft Comments

- 11.5 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;
- Historic England (PD103) supports the approach to high quality design. In part (11) it is important to recognise that there may be cumulative impacts from tall buildings.
 - Barratt David Wilson Homes (PD1623), Bellway Homes (PD1948), Home Builders Federation (PD4749), Taylor Wimpey (PD3742), Avant Homes (PD1519), Story Homes (PD876), Hellens Land (PD5056), Karbon Homes (PD3388) Esh Developments (PD1933), Burdon Lane Consortium (PD2517) and Persimmon Homes (PD4079) do not consider that the introduction of national space standards has been evidenced.
 - Springwell Village Residents Association (PD5048) considers 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.
 - Burdon Lane Consortium (PD2517), Esh Developments (PD1933), Hellens Land (PD5056) and Taylor Wimpey (PD3742) consider parts 8, 10 and 13 of the Policy onerous and overly restrictive.
 - Esh Developments (PD1933) and Hellens Land (PD5056) consider paragraph 9.5 should state that design codes for large scale developments should not be mandatory requirements.
 - Story Homes (PD876) set out it was not clear when the requirement for Masterplans or development frameworks will be applied.

How Issues Have Been Taken into account prior to Submission

- 11.6 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the issues on national described space standards, the 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 report (2018) (SD.25). 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 National Described Space Standards (NDSS).
- 11.7 In response to Springfield Village Residents Association (PD5048), the Council considers each Housing Growth Area (HGA) site to adhere to the guidance outlined in this policy.

³⁸⁷ [https://www.sunderland.gov.uk/media/20868/SD-25-Internal-Space-Standards-2018-/pdf/SD.25 Internal Space Standards 2018.pdf?m=636802950168600000](https://www.sunderland.gov.uk/media/20868/SD-25-Internal-Space-Standards-2018-/pdf/SD.25%20Internal%20Standards%202018.pdf?m=636802950168600000)

HGA1 South West Springwell states that development should ensure that the open aspect to Bowes Railway Scheduled Ancient Monument (SAM) is retained and more constraints/parameters are highlighted within the Development Framework (2018) (SD35)³⁸⁸.

- 11.8 In response to Burdon Lane Consortium (PD2517), Esh Developments (PD1933), Hellens Land (PD5056) and Taylor Wimpey (PD3742) on parts 8, 10 and 13 being too onerous; these subsections of the policy aim 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.
- 11.9 In response to Esh Developments (PD1933) and Taylor Wimpey (PD3742) on the issue of design codes, Masterplans and development frameworks; design codes and development frameworks 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. 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.
- 11.10 In response to the representation raised by Historic England (PD103) the Council has proposed an additional modification as part of a Statement of Common Ground (SD08.k)³⁸⁹ and set out in the Schedule of Modifications (SD.3)³⁹⁰ to include a reference to the cumulative impacts of development (M45).

Proposed Modifications to the Publication Draft

11.11 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
9.2	It expects all new development to embrace the principles of sustainable design, positively respond to the character and setting, as well as avoiding harmful <u>and/or cumulative</u> impacts to the amenity of neighbouring buildings, local character and heritage assets.	To address representations submitted by Historic England (PD103). The Council have also signed a Statement of Common Ground (SD08.k).
9.4	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>	For clarity

³⁸⁸ [https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

³⁸⁹ https://www.sunderland.gov.uk/media/21012/SD-8j-Unduly-Made-Representations/pdf/SD.8j_Unduly_Made_Representations.pdf?m=636808180571630000
https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

³⁹⁰ https://www.sunderland.gov.uk/media/21042/SD-3-CSDP-Schedule-of-Minor-Modifications/pdf/SD.3_CSDP_Schedule_of_Minor_Modifications.pdf?m=636809026727800000

Duty to Cooperate (SD.11)³⁹¹

11.12 No Duty to Cooperate (SD.11) issues have been identified against this policy.

Sustainability Appraisal (2017) (SD.12)³⁹²

11.13 The following table is a visual summary of the detailed assessment provided in SA (SD12) Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.14 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)³⁹³

11.15 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	+	++	~	++	++	+	+	~	++	++	+	~	+	++

11.16 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.17 The NPPF 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.

11.18 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.

Landscaping, Green Infrastructure and Public Realm

11.19 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.

³⁹¹[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

³⁹²[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

³⁹³[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

11.20 The requirements of Policy BH1 are not considered too onerous. They are guidelines and are not intended to be prescriptive. The Policy states “development should...” which implies that there may be instances when it is not appropriate or viable to upgrade or enhance landscaping, green infrastructure or public realm – but if it is possible then development should deliver this. 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.

Established Views of Important Buildings, Structures and Landscape Features

11.21 The Council considers point 10 of the policy a positive design aspiration and do not consider it overly restrictive or inflexible. This policy offers design guidance and is not intended to be prescriptive. If a proposal can demonstrate that impact to established views of important buildings, structures or landscape features is unavoidable as a result of development, it may be acceptable on balance due to the benefit of the scheme, mitigation or financial contribution. It is not considered necessary to change the wording of the policy at this stage.

11.22 The Plan identifies a number of HGA sites. The Council considers each of these 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”.

Durability and Adaptability in Development

11.23 The NPPF encourages development that will function well and add to the overall quality of the area over the lifetime of the development and adapt to the needs of future generations. The SHMA Addendum (2018)³⁹⁴ recommends that the Council requires 10% of new development to meet optional accessibility standards, subject to viability. Policy H1 is consistent with these recommendations. The Sunderland Viability Note (2018: p7) (SD.61)³⁹⁵ 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 the inclusion of BH1.13 to encourage a wider implementation of durability, adaptability and reuse in development, in line with national policy and guidance, without being overly prescriptive and onerous.

Nationally Described Space Standards

11.24 The Government’s NDSS set out in Technical Housing Standards of March 2015 deal with internal space within new dwellings and is suitable for application across all tenures. It sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height. When considering whether or not to adopt these space standards, local authorities should take account of need, viability, and timing.

11.25 To establish the need for minimum internal space standards within the plan area, the Council reviewed recently built and permitted housing within the city to determine internal

³⁹⁴ [https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_\(2017\).pdf?m=636802949385070000](https://www.sunderland.gov.uk/media/20866/SD-23-Sunderland-Strategic-Housing-Market-Assessment-Update-2017-/pdf/SD.23_Sunderland_Strategic_Housing_Market_Assessment_Update_(2017).pdf?m=636802949385070000)

³⁹⁵ [https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_\(2018\).pdf?m=636803112052470000](https://www.sunderland.gov.uk/media/20902/SD-61-Sunderland-City-Council-Post-Consultation-Pre-submission-Viability-Note-2018-/pdf/SD.61_Sunderland_City_Council_Post_Consultation-Pre_Submission_Viability_Note_(2018).pdf?m=636803112052470000)

sizes and how they perform against the national standards. This review included a sample size of 123 recently completed dwellings including a range of house types, sizes, tenures, and developers, across all 5 sub-areas.

Table 38 Comparison of the size of new housing with national space standards

	Average Size in SQM	Average Percentage of the National	National Standard Range (SQM)
Average 2 bedroom house	64	86.10%	70-79
Average 3 bedroom house	87.82	92.24%	84-108
Average 4 bedroom house	122.67	105.82%	97-130

- 11.26 Of the 123 dwellings sampled, 81 of these did not meet NDSS, 2 dwellings met the standard and 40 exceeded the standard. In relation to specific house types the average new build two-bed properties built within the city fall below the national standards. The difference in the size varies with certain house types only being around 2m² less than the standard, but some being considerably smaller than the national standards, approximately 23m² smaller.
- 11.27 This is also the case with three-bed properties, with the majority of properties of this size falling short of the national standards. The shortfall ranges from 1m² up to 31m², which is a considerable difference when looking at national space standards.
- 11.28 This picture differs for four-bed properties being built within the city as the majority of four-bed house types are being built either in line with space standards, or above. Those properties that are below space standards range from being 1m²- 21m² below, and those which are above range from 2m² - 60m². However, those properties which are over the space standards by 60m² are few and far between and the average additional space ranges between 10m² to 40m².

Table 39 Area comparison of the size of new housing with national space standards

Subarea	Bedrooms	Average difference from national standard (m2)	Average difference % of Space Standard
Urban Core	2	-10.00	85.48
	3	N/A	N/A
	4	N/A	N/A
Sunderland South	2	-15.2	80.27
	3	-12.37	87.01
	4	-1.27	99.05
Sunderland North	2	-7.5	88.76
	3	-3.65	96.03
	4	2.9	101.79
Washington	2	-15.67	79.3
	3	-7.33	92.27
	4	18.73	115.67
Coalfield	2	-3.6	95.31
	3	-10.81	88.5
	4	7.25	106.43

- 11.29 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 policy BH1.14.
- 11.30 The Council's Whole Plan Viability Assessment (2017) (SD.60)³⁹⁶ assesses and tests the policies contained within the draft Local Plan. As part of the assessment the balance of contributions sought from developers, including affordable housing, other policy requirements and the cost of infrastructure and mitigation are considered. The modelling in the viability assessment has been based on building to the NDSS. The financial implications and the impact on site viability has therefore been taken into account and it is considered not to impact upon the viability and deliverability of individual sites or on the overall plan.
- 11.31 It is widely assumed that new build dwellings are smaller than older properties and the Council considers that the above evidence confirms this assumption within the plan area. This justifies the inclusion of BH1.14 in the Plan due to the aforementioned effect on health, educational attainment, familial relationships and social cohesion as a result of a lack of space in the home.
- 11.32 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. A requirement when adopting NDSS is that a clearly evidenced need must be demonstrated. The Council has demonstrated this need in the Internal Space Standards (2018) report (SD.25) and does not consider this point to affect the soundness of this policy. Outlined above and in the Council's Whole Plan Viability Assessment (2017) (SD.60) is the evidential basis that this will not impact upon the viability and deliverability of individual sites or on the overall plan.
- 11.33 There is a variance in the methodologies used to produce the evidence base for this policy. The Whole Plan Viability Assessment (2017) (SD.60) and the Post Consultation / Pre-submission Viability Note (2018) (SD.61) found that the majority of new homes built meet or exceed NDSS, while the Internal Space Standards (2018) report (SD.25) found that the majority do not. This is a product of the different methods used to research this topic. The calculation which finds most development meeting NDSS is based on Energy Performance Certificates (EPC) whilst the figure for development failing to meet NDSS measures the actual floor plans for new dwellings.
- 11.34 The Whole Plan Viability Assessment (SD.60) 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 requirements and therefore Policy BH1.14 is not considered to threaten viability or deliverability and its inclusion is considered justified by evidence. These requirements are not considered to place any undue burden on developers. There is no reason that the minimum requirement of NDSS should prevent an appropriate mix of sites coming forward.

³⁹⁶ [https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_\(with_CIL_Scoping\)_2017\).pdf?m=63680311173630000](https://www.sunderland.gov.uk/media/20901/SD-60-Whole-Plan-Viability-Assessment-with-CIL-scoping-2017-/pdf/SD.60_Whole_Plan_Viability_Assessment_(with_CIL_Scoping)_2017).pdf?m=63680311173630000)

Reasonable Alternatives

- 11.35 A reasonable alternative to introducing NDSS as a minimum requirement as part of Policy BH1 would be not including it as a requirement. This approach was not considered appropriate as it would not deliver on the recommendations of Internal Space Standards (2018) (SD25) report. 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.
- 11.36 Not including this as part of the Policy would leave no other mechanism to require that homes are built to a minimum space standard. This would potentially be detrimental the health and wellbeing of residents. The Council has opted for a high level of growth and failing to deliver a high standard of housing could result in residents looking to other authority areas which can provide this – impacting on the desired population growth set out in the Plan.

Effective Deliverable

- 11.37 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. Development should be in accordance with relevant SPDs on design which will be a material consideration in the determination of planning applications for relevant proposals. Masterplans and development frameworks should be prepared for large scale development and the need for design codes should be identified at the pre-application stage of development. New residential development should meet NDSS as a minimum and meet the adaptable homes standards outlined in Policy H1.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH1	Design Quality	Sets out the design principles that should be used across the city	<ul style="list-style-type: none"> • Decline in quality of development constructed • Significant Increase in applications approved contrary to policy • Number of applications awarded Building for Life Accreditation • Approval of planning applications which fail to meet NDSS 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Plan/Policy • Potential review of design-related SPD's and Masterplans 	<ul style="list-style-type: none"> • Schemes awarded Building for Life accreditation • Percentage of new build dwellings completions that meet Nationally Described Space Standards 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications

Consistent with National Policy

11.38 The NPPF attaches great importance to the design of the built environment. The policy is consistent with national policy as it sets out the quality of development that will be expected in the City, it also supports the move to a low carbon future and criteria set out in paragraph 96.

BH2 Sustainable Design and Construction

11.39 This policy sets out a number of guidelines through which major development can help deliver sustainability aims.

BH2 Sustainable Design and Construction

Sustainable design and construction should be integral to development. Where possible major development should:

1. maximise energy efficiency and integrate the use of renewable and low carbon energy;
2. reduce waste and promote recycling during construction and in operation;
3. conserve water resources and minimise vulnerability to flooding;
4. provide details of the type, life cycle and source of materials to be used;
5. provide flexibility and adaptability, where appropriate, allowing future modification of use or layout, facilitating future refurbishment and retrofitting;
6. include opportunities to incorporate measures which enhance the biodiversity value of development, such as green roofs;
7. include a sustainability statement setting out how the development incorporates sustainable resource management and high environmental standards; and
8. maintain an appropriate buffer between sensitive development and existing waste water treatment works to ensure amenity and operational continuity, in accordance with Government Code of Practice guidance.

Positively Prepared

Vision and Strategic Priorities

11.40 This policy will deliver the spatial vision by; offering a mix of good quality housing, both market and affordable, of the types, sizes and tenures that meet the needs and demands of existing and future communities; and has a high quality natural, built and historic environment.

11.41 Policy BH2 will help to deliver Strategic Priorities 3, 8 and 9.

Draft Plan Comments

11.42 As set out in the Consultation Statement (SD.7)³⁹⁷, the following issues were raised during the draft Plan consultation;

- Northumbrian Water recommends that the policy requires an appropriate buffer to be maintained between sensitive development and existing waste water treatment works.
- Historic England welcomes the approach.
- Developers object that development should maximise energy efficiency

How Issues Have Been Taken into Account at Publication Draft

- Northumbrian Water's comments have been agreed and the policy has been duly updated.

³⁹⁷ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Policy BH2 has been amended to indicate that where possible major development should seek to maximise energy efficiency and integrate the use of renewable and low carbon energy.

Publication Draft Comments

11.43 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- The Environment Agency (PD219) supports the policy and suggests it is delivered in accordance with Policy WWE2 and WWE3.
- Burdon Lane Consortium (PD2535) generally supports the policy but consider it is inflexible and onerous in places.
- Historic England (PD104) welcomes the positive approach to sustainable design and construction.
- Barratt David Wilson Homes (PD1625) suggests the policy repeating national policy.
- Bellway Homes (PD1957) suggests part 1 of Policy BH2 is not consistent with the Written Ministerial Statement which indicates that energy requirements for new homes are a matter solely for building regulations.
- Persimmon Homes (PD4088) claims the requirement to maximise energy efficiency and integrate the use of low carbon energy is too onerous and that some of the requirements for the Sustainability Statement would be onerous and not deliverable.
- Story Homes (PD886) supports the Council's aims of ensuring that new development is sustainably designed and constructed. However, sub-point 1 may have viability implications, sub point 4 requires an excessive level of information, and the requirements for green roofs and Sustainability Statements are too onerous.
- The Home Builders Federation (PD4783) generally support the use of low carbon and renewable energy, however would question if the policy 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.

How Issues Have Been Taken into account prior to Submission

11.44 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledges support from the Environment Agency (PD219), Burdon Lane Consortium (PD2535) and Historic England (PD104).

11.45 In response to the additional comments above, 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. The Council considers these guidelines reasonable and they are only applicable to major developments, where possible.

Duty to Cooperate (SD.11)³⁹⁸

11.46 No Duty to cooperate issues have been identified against this policy.

³⁹⁸[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

Sustainability Appraisal (2017) (SD.12)³⁹⁹

11.47 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.48 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴⁰⁰

11.49 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	~	~	~	~	~	~	++	~	~	+	++	~	~

11.50 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.51 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. Development needs to be sustainably designed and constructed (and use resources sustainably) in order to mitigate for climate change and to withstand its effects. The NPPF sets out several planning principles which can help achieve this aim: securing high quality design for existing and future occupiers; supporting the transition to a low carbon future; taking account of flood risk and coastal change; and encouraging the reuse of existing resources, including the conversion of existing buildings and reuse of brownfield land. Policy BH2 sets out a number of guidelines through which major development can help deliver these sustainability aims. The policy offers flexibility and the 8 sub points of the policy are not prescriptive but intended as guidance.

Energy Efficiency Measures

11.52 The Planning and Energy Act (2008)⁴⁰¹ (as amended 06.09.2015) states: A local planning authority in England may in their development plan documents include policies imposing reasonable requirements for:

- 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.

11.53 The Deregulation Act (2015)⁴⁰² amends the Planning and Energy Act (2008), removing the power of Local Authorities to require housing development in their area to comply with

³⁹⁹ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴⁰⁰ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

⁴⁰¹ <https://www.legislation.gov.uk/ukpga/2008/21/contents>

energy efficiency standards that exceed the energy requirements of building regulations (subsection c above). Local Authorities still have the option to include policies which requires development to use energy from renewable and low carbon sources, as is set out in Policy BH2.1; "development should... maximise energy efficiency and integrate the use of renewable and low carbon energy".

- 11.54 The Council considers Policy BH2 to offer guidelines for sustainable development as opposed to requirements as permitted in the Planning and Energy Act (2008). The Council considers these guidelines reasonable. In any event, the guidelines set out in BH1 only apply to major developments and the policy contains a degree of flexibility with the inclusion of the wording "...where possible".

Durability and Adaptability in Development

- 11.55 The NPPF encourages development that will function well and add to the overall quality of the area over the lifetime of the development and adapt to the needs of future generations. The SHMA Addendum (2018) (SD.24)⁴⁰³ recommends that the Council requires 10% of new development to meet optional accessibility standards, subject to viability. Policy H1 is consistent with these recommendations. The Post Consultation/Pre-submission Viability Note (2018: p7) (SD.61)⁴⁰⁴ 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 the inclusion of BH2.5 to encourage a wider implementation of durability, adaptability and reuse in development, in line with national policy and guidance, without being overly prescriptive and onerous.

Sustainability Statements

- 11.56 A core principle of the NPPF is for the planning system to support the transition to a low carbon future and encourage the use of renewable resources. It states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change. Local Plans should include strategic policies to deliver climate change mitigation and adaptation. To support the move to a low carbon future, the NPPF advises that when local planning authorities set any local requirements for a building's sustainability, it should be consistent with the Governments' zero carbon buildings policy and adopt NDSS.
- 11.57 A Sustainability Statement is a report which demonstrates how a scheme will address core policies around environmental standards, sustainability, and resource management as set by the Council. These should accompany applications for major developments and would typically include: energy efficiency; water conservation; source, type and life cycle of materials; flood risk and drainage strategy; community impacts; transport; health and wellbeing; materials; pollution issues; ecology and best practice management of the site.

Reasonable Alternatives

- 11.58 The Council does not consider there are any reasonable alternatives.

Effective Deliverable

- 11.59 The policy will be delivered through the determination of planning applications, including the submission of Sustainability Statements for major development schemes in order to demonstrate policy compliance

⁴⁰² <http://www.legislation.gov.uk/ukpga/2015/20/contents/enacted>

⁴⁰³ [https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_\(2018\).pdf?m=636802949780630000](https://www.sunderland.gov.uk/media/20867/SD-24-Sunderland-Strategic-Housing-Market-Assessment-Addendum-2018-pdf/SD.24_Sunderland_Strategic_Housing_Market_Assessment_Addendum_(2018).pdf?m=636802949780630000)

⁴⁰⁴ [https://www.sunderland.gov.uk/media/20394/Sunderland-Viability-Note-2018-pdf/68_Sunderland_Viability_Note_\(2018\).pdf?m=636644871554570000](https://www.sunderland.gov.uk/media/20394/Sunderland-Viability-Note-2018-pdf/68_Sunderland_Viability_Note_(2018).pdf?m=636644871554570000)

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH2	Sustainable design and construction	Sets out the sustainable design principles for major development	<ul style="list-style-type: none"> Decline in quality of sustainable development constructed Significant increase in applications approved contrary to policy Increase in number of major applications submitted without an accompanying Sustainability statement 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Potential review of design-related SPD's and Masterplans 	<ul style="list-style-type: none"> Planning applications granted that meet building regulation MH4 (2) accessible and adaptable standard Planning applications that require a Sustainability Statement 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

11.60 The policy supports the NPPF's move to a low carbon future set out in paragraph 95.

BH3 Public Realm

11.61 This policy aims maintain and enhance the public realm, incorporating public art and sustainable design while creating attractive, safe and legible public space.

BH3 Public Realm

Existing and proposed areas of public realm will:

1. create attractive, safe, legible, functional and accessible public spaces;
2. be constructed of quality, sustainable and durable materials which enhance the surrounding context; and
3. where appropriate, incorporate public art in development.

Positively Prepared

Vision and Strategic Priorities

11.62 This policy will deliver the spatial vision and strategic priorities by ensuring easy access to useable open space, leisure and recreation.

11.63 Policy BH3 will help to deliver Strategic Priority 7.

Draft Plan Comments

11.64 As set out in the Consultation Statement (SD.7)⁴⁰⁵, the following issues were raised against policy BH3.

- A resident suggested that there is nothing in Sunderland to visit
- Siglion support the policy.

⁴⁰⁵ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

How Issues Have Been Taken into Account at Publication Draft

11.65 No changes have been proposed to the policy to address issues raised.

Publication Draft Comments

11.66 As set out in the Consultation Statement (SD.7), no issues were raised during Publication Draft consultation.

How Issues Have Been Taken into account prior to Submission

11.67 As set out in the Consultation Statement (SD.7), no issues were raised during Publication Draft consultation.

Proposed Modifications to the Publication Draft

11.68 The Council proposes no modifications to the policy.

Duty to Cooperate (SD.11)⁴⁰⁶

11.69 No Duty to Cooperate issues have been identified against this policy.

Sustainability Appraisal (2017) (SD.12)⁴⁰⁷

11.70 The following table is a visual summary of the detailed assessment provided in SA (SD.12) Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.71 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴⁰⁸

11.72 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	++	++	+	~	~	++	~	+	+	~	++

11.73 The SA made the no recommendations for changes to be made to the Publication Draft.

Justified

11.74 The Government 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. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

⁴⁰⁶[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴⁰⁷[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴⁰⁸[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

11.75 High quality public realm can act as a catalyst for regenerating the city, by making it a more attractive place to invest, work, live and visit. It is an essential ingredient in supporting the long term future of our city centre and local centres and in supporting major recreational areas such as the coastline and riverside. The Council’s Economic Masterplan⁴⁰⁹ (SP.30), Central Area Urban Design Strategy⁴¹⁰ (SP.34) and Design and Access SPD⁴¹¹ (SP.35) inform Policy BH3, which aims to maintain and enhance the public realm, incorporating public art and sustainable design while creating attractive, safe and legible public space.

Reasonable Alternatives

11.76 The Council does not consider there are any reasonable alternatives.

Effective

Deliverable

11.77 The policy will be delivered through the determination of planning applications. Contributions will be sought in line with the Draft Planning Obligations SPD (2018) (SD63). This SPD sets out the mechanism through which infrastructure will be delivered and the thresholds above which developers/landowners must contribute. The Council will secure planning obligations from new development within the city via Section 106 of the Town and Country Planning Act (1990) (as amended) in order to maintain and enhance the public realm. Further information on the delivery of infrastructure through planning obligations can be found in the Infrastructure Delivery Plan (2018) (SD.59)⁴¹², Draft Planning Obligations SPD (2018) (SD.63)⁴¹³, and Policies ID1 and ID2 of the Plan.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH3	Public Realm	Aims to achieve high quality public realm across the city	<ul style="list-style-type: none"> Decline in quality of public realm Missed opportunities to improve public realm through development 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Potential review of public funding opportunities 	<ul style="list-style-type: none"> Public realm and public art schemes completed 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

11.78 The policy supports the criteria that are set out in paragraph 58 of the NPPF.

⁴⁰⁹ https://www.sunderland.gov.uk/media/20930/SP-30-Sunderland-Economic-Masterplan/pdf/SP.30_Sunderland_Economic_Masterplan.pdf?m=636803131897070000

⁴¹⁰ [https://www.sunderland.gov.uk/media/20934/SP-34-Sunderland-Central-Area-Urban-Design-Strategy-2008-pdf/SP.34_Sunderland_Central_Area_Urban_Design_Strategy_\(2008\).pdf?m=636803133755530000](https://www.sunderland.gov.uk/media/20934/SP-34-Sunderland-Central-Area-Urban-Design-Strategy-2008-pdf/SP.34_Sunderland_Central_Area_Urban_Design_Strategy_(2008).pdf?m=636803133755530000)

⁴¹¹ [https://www.sunderland.gov.uk/media/20935/SP-35-Design-and-Access-Statements-SPD-2008-pdf/SP.35_Design_and_Access_Statements_SPD_\(2008\).pdf?m=636803134144630000](https://www.sunderland.gov.uk/media/20935/SP-35-Design-and-Access-Statements-SPD-2008-pdf/SP.35_Design_and_Access_Statements_SPD_(2008).pdf?m=636803134144630000)

⁴¹² [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

⁴¹³ [https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_\(2018\).pdf?m=636803113837800000](https://www.sunderland.gov.uk/media/20904/SD-63-Planning-Obligations-Supplementary-Document-Draft-2018-pdf/SD.63_Planning_Obligations_Supplementary_Planning_Document_Draft_(2018).pdf?m=636803113837800000)

BH4 Advertisements

11.79 This policy supports development management by enabling the efficient, effective and simple control over advertisements in terms of amenity and safety

BH4 Advertisements

Development for advertisements should:

1. be well designed and sympathetic to the character and appearance of their location and the building to which they relate, having regard to matters such as size, materials, construction, location, level of illumination and cumulative impact with other signage on the building and within the vicinity; and
2. for illuminated advertisements and signs, not adversely affect the amenity and/or safety of the surrounding area.

Positively Prepared

Vision and Strategic Priorities

11.80 This policy will deliver the spatial vision by helping to create vibrant, well supported, town, district and local centres that are places to meet as well as shop. It will also help to create a high quality natural built and historic environment.

11.81 Policy BH4 will help to deliver Strategic Priorities 6 and 7.

Draft Plan Comments

11.82 As set out in the Consultation Statement (SD.7)⁴¹⁴, no issues were raised during the draft Plan consultation.

How Issues Have Been Taken into Account at Publication Draft

11.83 As set out in the Consultation Statement (SD.7), no issues were raised during the draft Plan consultation.

Publication Draft Comments

11.84 As set out in the Consultation Statement (SD.7), no key issues were raised during Publication Draft consultation.

How Issues Have Been Taken into account prior to Submission

11.85 As set out in the Consultation Statement (SD.7), no key issues were raised during Publication Draft consultation.

Duty to Cooperate (SD.11)⁴¹⁵

11.86 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017) (SD.12)⁴¹⁶

11.87 The following table is a visual summary of the detailed assessment provided in SA (SD.12) Appendix D (the policy covered both Advertisements and Shop Fronts). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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⁴¹⁴ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

⁴¹⁵ [https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴¹⁶ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

11.88 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴¹⁷

11.89 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	~	~	+	~	~	~	~	~	~	~	++

11.90 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.91 Paragraph 67 of the NPPF states advertisements should be determined only in relation to amenity and public safety, while taking account of cumulative impacts. Whilst it is acknowledged that advertisements play a supportive role in promoting the city’s businesses, care must be given to ensure that their design does not have a negative impact upon area amenity and public safety. The Council therefore includes this policy to ensure that advertisements are designed to a high standard and contribute to a safe and attractive environment.

11.92 Poorly placed advertisements can have a negative impact on the appearance of the built and natural environment. Policy BH4 supports development management by enabling the efficient, effective and simple control over advertisements in terms of amenity and safety.

Reasonable Alternatives

11.93 The Council does not consider there are any reasonable alternatives.

Effective Deliverable

11.94 The policy will be delivered through the determination of planning applications.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH4	Advertisements	To ensure that advertisements are of a high standard and protect local amenity	<ul style="list-style-type: none"> Significant increase in advertisements approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy and enforcement 	<ul style="list-style-type: none"> Advertisement consent appeals allowed 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

⁴¹⁷[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=63680291143650000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=63680291143650000)

Consistent with National Policy

11.95 The policy is consistent with paragraph 67 of the NPPF.

BH5 Shop Fronts

11.96 This policy aims to maintain and improve the vitality and viability of centres by ensuring development enhances the appearance of buildings.

BH5 Shop Fronts

1. Development for shop fronts and signs will be supported where the following criteria is satisfied:
 - i. the design is well related to the scale and appearance of the building to which the proposal relates; and
 - ii. the design respects the character and appearance of the location.
2. Solid shutters which present a blank frontage to shopping streets will not be permitted.
3. Proposals relating to Listed Buildings, within Conservation Areas and in areas of special advertisement control will be subject to the requirements of the relevant designation and appropriate planning policy guidance.

Positively Prepared

Vision and Strategic Priorities

11.97 This policy will deliver the spatial vision by; helping deliver an Urban Core that is revitalised and is a destination of choice, a place for people to live, work and spend their leisure time; and ensuring town, district and local centres are places to meet as well as shop.

11.98 Policy BH5 will help deliver Strategic Priorities 6 and 7.

Draft Plan Comments

11.99 As set out in the Consultation Statement (SD.7)⁴¹⁸, no issues were raised during the draft Plan consultation.

How Issues Have Been Taken into Account at Publication Draft

11.100 As set out in the Consultation Statement (SD.7), no issues were raised during the draft Plan consultation.

Publication Draft Comments

11.101 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Historic England (PD105) welcomes part 3 and paragraph 9.19 but suggest the policy could be strengthened.

How Issues Have Been Taken into account prior to Submission

11.102 In response to the representations raised by Historic England (PD105), the Council has proposed minor modifications to the supporting text of paragraph 9.19 through a Statement of Common Ground (SD08.k)⁴¹⁹ as set out in the Schedule of Modifications (SD.3; M48)⁴²⁰.

Proposed Modifications to the Publication Draft

11.103 The Council proposes the following modifications to;

⁴¹⁸ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

⁴¹⁹ https://www.sunderland.gov.uk/media/21012/SD-8j-Unduly-Made-Representations/pdf/SD.8j_Unduly_Made_Representations.pdf?m=636808180571630000
https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

⁴²⁰ https://www.sunderland.gov.uk/media/21042/SD-3-CSDP-Schedule-of-Minor-Modifications/pdf/SD.3_CSDP_Schedule_of_Minor_Modifications.pdf?m=636809026727800000

Policy/ Para/ Figure	Proposed Change	Justification
9.19	There are particularly sensitive areas of Sunderland where careful extra care should be taken over the design and materials	Typographical error
9.19	Proposals in such areas would therefore be required to <u>sustain and enhance the significance of designated Heritage Assets</u> and take account of any other appropriate planning guidance such as relevant Character Appraisal and Management Strategies (CAMS).	To address representations submitted by Historic England (PD105). The Council have also signed a Statement of Common Ground (SD08.k).

Duty to Cooperate (SD.11)⁴²¹

11.104 No Duty to Cooperate issues have been identified against this policy.

Sustainability Appraisal (2017) (SD.12)⁴²²

11.105 The following table is a visual summary of the detailed assessment provided in SA (SD.12) Appendix D (the policy covered both Advertisements and Shop Fronts). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.106 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴²³

11.107 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA) (SD.5). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	~	~	~	~	~	~	~	~	~	++	++

11.108 The SA made the following recommendations for changes to be made to the Publication Draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
The statement in the third paragraph of this policy that proposals in specific areas "will be subject to the requirements of the relevant designation" should be amended for clarity.	Supporting text added to clarify that in certain sensitive areas, a more careful approach might need to be taken and regard given to other relevant policy documents such as CAMs.

⁴²¹[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴²²[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴²³[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

Justified

- 11.109 Shop fronts form an important part of the overall appearance of the street scene and as such, proposals for this type of development need to ensure that changes positively enhance the appearance of the building as well as the immediate area and do not detract from it. A well-designed row of shop fronts can help to attract more visitors and consequently help maintain or improve the vitality and viability of Sunderland’s retail centres. However, certain security features such as solid shutters can have a negative impact on the character and appearance of the building and the centre, especially where there is a mixture of uses and opening hours. Solid shutters can create blank frontages, which detract from the visual vibrancy of the centre and can create an unsafe environment, particularly after dark.
- 11.110 Sunderland’s centres contain a rich variety of building types and shop fronts with historic shop fronts often alongside more contemporary frontages. Extra care needs to be taken regarding design where proposals would affect Listed Buildings or are located within Conservation Areas, in which case further guidance should be considered such as the relevant Character Appraisal and Management Strategies (CAMS)⁴²⁴. It is considered that Policy BH5.3 provides sufficient protection to designated heritage assets as this is covered in more detail within Policies BH7 and BH8.

Reasonable Alternatives

- 11.111 The Council does not consider there are any reasonable alternatives.

Effective

Deliverable

- 11.112 The policy will be delivered through the determination of planning applications. Applications will be determined in accordance with relevant local and national policy, including the aforementioned CAMS and relevant SPDs. Dependent on location, improvements can be delivered in collaboration with Historic England through the ‘Historic High Streets’ Heritage Action Zone initiative.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH5	Shop fronts	To ensure that shop fronts are of a high standard and protect local amenity	<ul style="list-style-type: none"> Significant increase in shop fronts, signage and shutters approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy and enforcement 	<ul style="list-style-type: none"> Number of schemes approved contrary to policy 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

- 11.113 The policy is consistent with paragraph 67 of the NPPF.

⁴²⁴ SP36-SP46 Evidence Library

BH6 Quality Communications

11.114 This policy supports electronic communications development and seeks to ensure appropriate aesthetic in their design.

BH6 Quality Communications

1. Development should include high quality digital infrastructure, providing access to services from a range of providers.
2. Development for the installation of new telecommunications infrastructure must demonstrate that:
 - i. there would be no significant adverse effect on the external appearance of the building or on the space in which they are to be located;
 - ii. there would be no significant adverse impact on the special character and appearance of heritage assets;
 - iii. the applicant has explored the possibility of sharing facilities, such as masts, cabinet boxes, satellite dishes and antennae on existing buildings or other structures;
 - iv. opportunities to miniaturise and camouflage any telecommunications apparatus have been explored;
 - v. they are appropriately designed, coloured and landscaped to take account of their setting; and
 - vi. there would be no significant adverse impact on the visual amenities of neighbouring occupiers.

11.115 Policy BH6 will help to deliver Strategic Priority 13.

Positively Prepared

Vision and Strategic Priorities

11.116 This policy will deliver the spatial vision priorities by ensuring the Plan area is open to business and responsive to the changing needs and demands of our growing economy.

Draft Plan Comments

11.117 As set out in the Consultation Statement (SD.7)⁴²⁵, the following issues were raised during the draft Plan consultation;

- Virgin Media requests that the policy should require developers to consult with digital and telecommunication providers.

How Issues Have Been Taken into Account at Publication Draft

11.118 Policy BH6 has been amended to encourage developers to include access to high quality digital infrastructure from a range of providers.

Publication Draft Comments

11.119 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Virgin Media (PD3) welcomes the intention of the policy but felt it could be improved by ensuring that broadband networks are installed as standard and that multiple operators are, at the very least, consulted.
- Burdon Lane Consortium (PD2551) supports the policy but the inclusion of digital infrastructure is not within the control of the development industry, so the policy could raise deliverability issues.
- Persimmon Homes (PD4106) supports the policy but express concern over impacts of deliverability, as 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.

⁴²⁵ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

How Issues Have Been Taken into account prior to Submission

11.120 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to Virgin Media (PD3), the Council considers the Policy to be sound and consistent with the requirements of the NPPF.

11.121 In response to Burdon Lane Consortium (PD2551) and Persimmon Homes (PD4106), the NPPF 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 which suggests that communications infrastructure should be sympathetically designed and camouflaged.

Duty to Cooperate (SD.11)⁴²⁶

11.122 No Duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017) (SD.12)⁴²⁷

11.123 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.124 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴²⁸

11.125 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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11.126 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.127 It is not within the power of planning to ensure that broadband networks are installed or that multiple operators are consulted as part of development. The NPPF states that, in preparing Local Plans, local planning authorities should merely support the expansion of electronic communication networks. This includes telecommunications and high speed broadband. In line with paragraph 43 of the NPPF, this policy supports electronic communications development and seeks to ensure that communications infrastructure is sympathetically designed and camouflaged to Sunderland’s townscape and countryside.

⁴²⁶[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴²⁷[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴²⁸[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

11.128 The draft version of this policy was assessed in the Sustainability Appraisal (2017) (SD.12)⁴²⁹ which recommended that it would have a positive influence on communication, landscape and townscape and cultural heritage. This view was reinforced in the Sustainability Appraisal (2018) (SD.5)⁴³⁰. There is a minor amendment to the wording of the policy which is outlined in the Schedule of Minor Modifications (SD.3)⁴³¹.

Reasonable Alternatives

11.129 The Council does not consider there are any reasonable alternatives.

Effective Deliverable

11.130 The policy will be delivered through the determination of planning applications. When considering such applications the Council will also have regard to the legal requirements placed upon telecommunications operators to provide an adequate service, and any technical and operational constraints that may be faced.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH6	Quality communications	Sets out the criteria and supporting information required to assess a planning application	<ul style="list-style-type: none"> Significant increase in visually obtrusive and/or inappropriate telecoms infrastructure Increase in number of applications which fail to provide access to a range of providers 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review of Infrastructure Delivery Plan 	<ul style="list-style-type: none"> 4G mobile coverage Broadband speeds 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Telecoms providers Ofcom Which?

Consistent with National Policy

11.131 The policy supports the expansion of the telecommunications network is consistent with paragraph 43 of the NPPF.

BH7 Historic Environment

11.132 This policy seeks to ensure that great weight is given to the conservation and enhancement of the historic environment.

BH7 Historic Environment
The council will ensure that the historic environment is valued, recognised, conserved and enhanced, sensitively managed and enjoyed for its contribution to character, local distinctiveness and sustainable

⁴²⁹ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴³⁰ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2018).pdf?m=636802911436500000)

⁴³¹ https://www.sunderland.gov.uk/media/21042/SD-3-CSDP-Schedule-of-Minor-Modifications/pdf/SD.3_CSDP_Schedule_of_Minor_Modifications.pdf?m=636809026727800000

communities by:

1. giving great weight to the conservation of heritage assets (designated and non-designated) based on their significance in accordance with national policy;
2. supporting new development which makes a positive contribution to the character and townscape quality of the historic environment;
3. supporting and developing innovative initiatives that identify, maintain, conserve and sustain or return to beneficial usage designated or non-designated heritage assets;
4. capitalising in an appropriate and sensitive manner on the regeneration and tourism potential of heritage assets;
5. taking a positive and proactive approach to securing the conservation and re-use of heritage assets at risk, including working with owners and partner organisations to develop schemes that will address the at-risk status of the assets and exploring opportunities for grant-funding to deliver viable schemes;
6. reviewing existing local heritage designations, such as Conservation Areas, and making new designations to protect and conserve built heritage assets, where justified, by appropriate surveys and evidence;
7. using Article 4 Directions, where appropriate, to protect features of historic/architectural importance; and
8. improving access and enjoyment of the historic environment where appropriate, by supporting proposals that retain, create or facilitate public access to heritage assets to increase understanding, appreciation and enjoyment of their significance, special qualities and cultural values.

Positively Prepared

Vision and Strategic Priorities

11.133 This policy will deliver the spatial vision and strategic priorities by ensuring the Plan area has a high quality natural, built and historic environment.

11.134 Policy SP1 will help to deliver Strategic Priority 7.

Draft Plan Comments

11.135 As set out in the Consultation Statement (SD.7)⁴³², the following issues were raised during the draft Plan consultation;

- Historic England recommend alternative wording to the policy.
- The Tyne and Wear Archaeology Officer supports the policy and requests further reference to archaeology.
- Developers such as Hellens and agents acting on behalf of New Herrington Workingman's Club suggested alternative wording to be consistent with the NPPF.
- A resident has raised concerns regarding the loss or deterioration of specific buildings within the city.

How Issues Have Been Taken into Account at Publication Draft

- Historic England's alternative wording has been accepted and the policy has been altered.
- The Tyne and Wear Archaeology Officer's comment has been addressed within a new policy relating to Archaeology and the Recording of Heritage Assets.
- With one minor exception, the alternative wording put forward by developers and agents has been agreed and altered in the report.
- The resident's concern regarding specific building loss has been noted and been raised with the Council's Conservation Team.

⁴³² [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

Publication Draft Comments

11.136 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Historic England (PD107 & PD106) welcomed the very positive and comprehensive approach taken to the historic environment within this chapter and through this policy but request the CSDP incorporates reference to the distinction historic environment of Sunderland.
- The Minerals Products Association (PD4395) states that the policy seek 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.
- Springwell Village Residents Association (PD5057) considers that Site HGA1 conflicts with Policy BH7 due to the impacts on the setting of the Bowes Railway SAM and associated heritage assets.
- A resident (PD8202) states that 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.

How Issues Have Been Taken into account prior to Submission

11.137 In response to the representation raised by Historic England (PD107) the Council has proposed a minor modification as part of a Statement of Common Ground (SD08.k)⁴³³ which is set out in the Schedule of Modifications (SD.3)⁴³⁴. This is to include a reference to the distinctive historic environment of Sunderland in paragraph 9.23 (M49).

11.138 In response to the Mineral Products Association (PD4395) policy BH7 relates to the conservation and enhancement of the historic environment and the source of building materials is not relevant to this Policy.

11.139 In response to the Springwell Village Residents Association (PD5057), 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 the Development Framework (2018) (SD.35)⁴³⁵ for this site.

11.140 In response to the comments raised by a resident (PD8202), site 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 OAHN and contribute to townscape quality. Further justification is set out in the Development Framework (2018) (SD.35) for this site.

⁴³³https://www.sunderland.gov.uk/media/21012/SD-8j-Unduly-Made-Representations/pdf/SD.8j_Unduly_Made_Representations.pdf?m=636808180571630000
https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

⁴³⁴https://www.sunderland.gov.uk/media/21042/SD-3-CSDP-Schedule-of-Minor-Modifications/pdf/SD.3_CSDP_Schedule_of_Minor_Modifications.pdf?m=636809026727800000

⁴³⁵[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-/pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

Proposed Modifications to the Publication Draft

11.141 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
9.23	Sunderland benefits from a rich, diverse and distinctive cultural and built heritage <u>historic environment</u> that makes a fundamental contribution to the quality of the environment and providing a sense of place and belonging for its local communities.	To address representations submitted by Historic England (PD107). The Council have also signed a Statement of Common Ground (SD08.k).

Duty to Cooperate (SD.11)

11.142 The Council has worked proactively with Prescribed Bodies at each stage of Plan preparation and consultation and has met with Historic England in 2017 and 2018 to discuss the emerging Core Strategy and Development Plan. Historic England made several representations during consultation on the Publication Draft Plan. The Council and Historic England have signed a Statement of Common Ground (SD08.k) which agrees several minor modifications to sections of the Plan which refer to heritage and the historic environment. This engagement is set out in the Duty to Cooperate Statement (SD11).

Sustainability Appraisal (2017) (SD.12)

11.143 The following table is a visual summary of the detailed assessment provided in SA (SD.12) Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.144 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)

11.145 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	+	~	~	~	~	++	~	~	~	~	~	++	+

11.146 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.147 The NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Sunderland's historic environment is rich and varied and includes archaeological remains, historic buildings, townscapes and landscapes, and includes locally significant assets and their settings in addition to designated and statutorily protected features. The Council acknowledges the value and importance of the city's historic environment and recognises that its heritage assets should be conserved and enhanced in a manner appropriate to their significance,

and in line with national policy and advice from Historic England. The Council has produced 11 Conservation Area Appraisals and Management Strategies (CAMS)⁴³⁶ to provide adopted planning guidance for designated Conservation Areas. The Tyne and Wear Historic Environment Record (HER) provides updated historic records to guide and inform development.

- 11.148 Policy BH7 seeks to ensure that great weight is given to the conservation of heritage assets. In line with this aim, the Council considers the Housing Growth Areas (HGAs) identified in the Plan to conserve the historic environment. 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. HGA9 at Penshaw is not considered to impact on Penshaw Monument. The development of these sites will meet the plan area's housing requirement and contribute to townscape quality. The 2018 Green Belt Boundary Assessment (SD.33 and SD.34)⁴³⁷ recommends that these and all other identified HGAs are suitable housing sites that, with sensitive design and mitigation, will sustain and enhance character and local distinctiveness. Further consideration is given to these and other HGA sites in the Compliance Statement. None of these sites are considered to negatively impact the historic environment or heritage assets.
- 11.149 This Policy also addresses heritage assets which are at risk. The Sunderland 'Historic High Streets' Heritage Action Zone (HAZ) is a partnership with Historic England which encompasses the Old Sunderland conservation area, the Old Sunderland Riverside conservation area and part of the Sunnyside conservation area. The project aims to bring Sunderland's high street heritage back to life; focussing on reconnecting Fawcett Street, Church Street, High Street East and High Street West with the modern city centre to help rejuvenate and unlock the potential of the area to help it achieve sustainable growth. The project will include an intensive programme of research, repair and regeneration, alongside community projects encouraging local people to get involved. This area is included in Historic England's Heritage at Risk register⁴³⁸.

Reasonable Alternatives

- 11.150 The Council does not consider there are any reasonable alternatives.

Effective Deliverable

- 11.151 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. A Heritage Statement must accompany all applications that affect heritage assets and should describe the significance of the heritage asset and the impact of the proposals on its significance. Development that affects Listed Buildings requires Listed Building Consent, and development within Conservation Areas will be considered against relevant CAMS reports. Article 4 Directions will continue to be used as an effective way of conserving the character and appearance of Conservation Areas. The County Archaeologist (and where appropriate, Historic England) will provide advice and recommendations relating to development proposals.

⁴³⁶ SP36-SP46 Evidence Library

⁴³⁷ https://www.sunderland.gov.uk/media/20876/SD-33-Review-of-the-Sunderland-Green-Belt-Part-1-Exceptional-Circumstances-for-Releasing-Land-from-the-Green-Belt/pdf/SD.33_Review_of_the_Sunderland_Green_Belt_Part_1-Exceptional_Circumstances_for_Releasing_Land_from_.pdf?m=636802953653470000
[https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_\(2018\).pdf?m=636802954099430000](https://www.sunderland.gov.uk/media/20877/SD-34-Review-of-the-Sunderland-Green-Belt-Part-2-Boundary-Assessment-and-Recommendations-2018-/pdf/SD.34_Review_of_the_Sunderland_Green_Belt_Part_2_Boundary_Assessment_and_Recommendations_(2018).pdf?m=636802954099430000)

⁴³⁸ <https://historicengland.org.uk/advice/heritage-at-risk/search-register/>

11.152 Consultation will take place with Council Conservation Officers on planning applications to ensure development proposals conserve and/or enhance the historic environment. The Council's Conservation Team will review its existing conservation areas, including their boundaries, and prepare updated CAMS, and will review historic areas across the city for their potential to be designated as new conservation areas.

11.153 The Council will continue to work with partners, property owners and developers, and bid for grant funding from organisations such as Heritage Lottery Fund and Historic England to collaboratively deliver regeneration schemes that address heritage-at-risk, repair, restore and return into viable and sustainable uses heritage assets, deliver wider improvements to the historic environment, and increase public access and the visitor offer of heritage assets as part of such schemes.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH7	Historic Environment	Aims to protect, enhance and manage the city's historic environment	<ul style="list-style-type: none"> • Significant loss of, harmful impacts or deterioration of heritage assets • Increased number of heritage assets on Heritage at Risk Register, or otherwise identified as being at risk • Lack of progress in adopting CAMS • Lack of success in securing funding for addressing heritage at risk 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation /decisions contrary to policy • Review objectives of policy with key partners and stakeholders, including Historic England and Tyne & Wear Specialist Conservation Team • Potential review of the Plan/Policy • Identify potential activities / interventions to address issues, including reviewing funding opportunities 	<ul style="list-style-type: none"> • Appeals allowed in conservation areas, and for applications affecting listed buildings, schedule ancient monuments, historic parks and gardens and non-designated heritage assets • Number of Grade I and II* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register • Number of formally adopted Conservation Area Character Appraisals and Management Strategies (CAMS) 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Conservation Area Character Appraisals and Management Strategies (CAMS) • Historic England's Heritage at Risk Register

					<ul style="list-style-type: none"> • Number of heritage assets at risk restored through successful funding bids • Number of Article 4 Directions used 	
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Consistent with National Policy

11.154 The policy sets out a positive strategy for the conservation and enjoyment of the historic environment and therefore complies with paragraph 126 of the NPPF.

BH8 Heritage Assets

11.155 This policy seeks to ensure that great weight is given to the conservation and enhancement of designated and non-designated heritage assets.

BH8 Heritage Assets

1. Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset(s), including any contribution made by its setting where appropriate.
2. Development affecting a Listed Building, including alterations and additions should:
 - i. conserve and enhance its significance in regards to the protection, repair and restoration of its historic fabric, its features and plan form, its boundary enclosures, its setting and views of it, its group value and contribution to local character and distinctiveness; and
 - ii. be sympathetic and complimentary to its height, massing, alignment, proportions, form, architectural style, building materials, and its setting.
3. The demolition of and/or substantial harm to Listed Buildings will only be considered in exceptional circumstances and with clear and convincing justification.
4. To preserve or enhance the significance of Conservation Areas, including their diverse and distinctive character, appearance and their setting, development:
 - i. should be in accordance with the objectives and proposals of the adopted Character Appraisal and Management Strategy (CAMS) for the relevant Conservation Area;
 - ii. should make a positive contribution to the character and distinctiveness of the Conservation Area;
 - iii. should support proposals for the conversion and adaptive re-use of vacant and underused buildings and heritage/townscape value in a sensitive manner; and
 - iv. within and adjacent to Conservation Areas should be of high design quality, to respect and enhance the established historic townscape and built form, street plan and settings of Conservation Areas and important views and vistas into, within and out of the areas.
5. The demolition or unsympathetic alteration of buildings which make a positive contribution to a Conservation Area will only be acceptable in exceptional circumstances and must be robustly justified.
6. Development of open spaces and the loss of any trees that contribute to the essential character of Conservation Areas and the settings of individual buildings within them will be resisted unless there are clear heritage or environmental benefits that outweigh the loss.
7. Development within or adjacent to the Registered Historic Parks and Gardens and unregistered Parks and Gardens that are considered by the council to be of historic interest, will be required to protect and enhance their designed landscape character and setting and their natural and built features of historic, architectural and artistic importance.
8. Development affecting non-designated heritage assets should take account of their significance, features and setting, and make a positive contribution to local character and distinctiveness.
9. In considering proposals affecting heritage assets identified as being at risk the council will support their conversion and adaptation where this secures their sympathetic repair, re-use in appropriate uses and sustains their significance into the future.

Positively Prepared

Vision and Strategic Priorities

11.156 This policy will deliver the spatial vision and strategic priorities by ensuring the Plan area has a high quality natural, built and historic environment.

11.157 Policy SP1 will help to deliver Strategic Priority 7.

Draft Plan Comments

11.158 As set out in the Consultation Statement (SD.7)⁴³⁹, the following issues were raised during the draft Plan consultation;

- Historic England requires policy bolstering regarding archaeology and the recording of heritage assets, and also recommend alternative wording to the policy.
- A resident would like to see more blue plaques in the city.
- Developers including Hellens and Taylor Wimpey suggested alternative wording to be consistent with the NPPF.

How Issues Have Been Taken into Account at Publication Draft

- In line with Historic England's comments, a separate policy now exists (Policy BH9) relating to Archaeology and the Recording of Heritage Assets (more in line with NPPF). The policy has been considerably updated and alternative wording has been accepted where possible and still applicable.
- The proposal for more blue plaques in the city has been noted and passed to the Historic Environment Team.
- In relation to the alternative wording put forward by developers, the policy has been changed and split into two policies, with some of the comments accepted, and reference to Heritage Statements has now been moved to the supporting text.

Publication Draft Comments

11.159 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Durham County Council (PD1393) welcome Criteria 6 which will allow the significance of the Lambton Castle Grade II of Special Historic Interest and Lambton Estate Park and Garden of Local Interest within County Durham which lies to the south of Sites HGA5 and 6 to be properly considered.
- Historic England (PD108) supports the policy and considers 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).
- Story Homes (PD5329) has concerns with BH8 (sub point 8) relating to non-designated heritage assets. The wording is inconsistent with NPPF and should be reworded accordingly.
- Burdon Lane Consortium (PD2574) state 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.
- Persimmon Homes (PD4113) state 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.
- A resident (PD8203) 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.

⁴³⁹ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Mineral Products Association (PD4397) 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.

How Issues Have Been Taken into account prior to Submission

- 11.160 The Council acknowledges Durham Country Council's (PD1393) response. In response to the representation raised by Historic England (PD108) the Council has proposed a minor modification as part of a Statement of Common Ground (SD08.k) which is set out in the Schedule of Modifications. This is to include a reference to *any contribution made* by the setting of heritage assets (M50).
- 11.161 In response to the representations asserting that the Policy is more onerous than the NPPF (PD2574, PD4113, PD5329), the Council has proposed an additional modification as set out in the Schedule of Modifications (M51). This is to ensure the Policy is consistent with national policy.
- 11.162 In response to the residents comment (PD8203), Policy 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 help to meet the Plans housing requirement and contribute to townscape quality. Further justification is set out in Development Framework (2018) (SD.35)⁴⁴⁰ for this site.
- 11.163 In response to the Mineral Products Association (PD4397), Policy BH8 relates to the conservation and enhancement of heritage assets and the source of building materials is not relevant to this Policy.

Proposed Modifications to the Publication Draft

11.164 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
BH8.1	Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and demonstrate how they conserve and enhance the significance and character of the asset(s), including <u>any contribution made by</u> its setting where appropriate.	To address representations submitted by Historic England (PD108). The Council have also signed a Statement of Common Ground (SD08.k) ⁴⁴¹ .
BH8.8	Development affecting non-designated heritage assets should conserve heritage assets, <u>take account of their significance,</u> their features and setting, and make a positive contribution to local character and distinctiveness.	To address representations submitted by several consultees (PD2574, PD4113, PD5329).

⁴⁴⁰[https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_\(2018\).pdf?m=636802954502200000](https://www.sunderland.gov.uk/media/20878/SD-35-Sunderland-Development-Frameworks-2018-pdf/SD.35_Sunderland_Development_Frameworks_(2018).pdf?m=636802954502200000)

⁴⁴¹https://www.sunderland.gov.uk/media/21012/SD-8j-Unduly-Made-Representations/pdf/SD.8j_Unduly_Made_Representations.pdf?m=636808180571630000
https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

Duty to Cooperate (SD.11)⁴⁴²

11.165 The Council has worked proactively with Prescribed Bodies at each stage of Plan preparation and consultation and has met with Historic England in 2017 and 2018 to discuss the emerging Core Strategy and Development Plan. Historic England made several representations during consultation on the Publication Draft Plan. The Council and Historic England have signed a Statement of Common Ground (SD08.k) which agrees several minor modifications to sections of the Plan which refer to heritage and the historic environment. This engagement is set out in the Duty to Cooperate Statement (SD.11).

Sustainability Appraisal (2017) (SD.12)⁴⁴³

11.166 The following table is a visual summary of the detailed assessment provided in SA Appendix D (the policy covered both Heritage Assets and Archaeology). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.167 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴⁴⁴

11.168 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	-	~	~	~	~	++	~	~	~	~	~	++	+

11.169 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.170 The NPPF states that local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. Sunderland’s historic environment is rich and varied and includes archaeological remains, historic buildings, townscapes and landscapes, and includes locally significant assets and their settings in addition to designated and statutorily protected features. Sunderland’s historic environment has a large number of heritage assets, both designated and non-designated, including 10 Scheduled Ancient Monuments, almost 700 listed buildings, 2 Registered Historic Parks and Gardens and 14 Conservation Areas. The Council acknowledges the value and importance of the city’s historic environment and recognises that its heritage assets should be conserved and enhanced in a manner appropriate to their significance, and in line with national policy and advice from Historic England. The Council has produced 12 Conservation Area Appraisals and Management Strategies (CAMS)⁴⁴⁵ to provide adopted

⁴⁴²[https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴⁴³[https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴⁴⁴[https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

⁴⁴⁵ SP36-SP46 Evidence Library

planning guidance for these areas. The Tyne and Wear Historic Environment Record (HER) provides updated historic records to guide and inform development.

- 11.171 In light of the above, this policy seeks to preserve and enhance the city’s heritage assets. The designations of Conservation Areas have been saved and will be reviewed in the A&D Plan. Other historic designations such as Listed Buildings, Scheduled Archaeological Sites, Protected Wreck Sites and Historic Parks, Gardens and Battlefields are awarded by Historic England. Site HGA9 at Penshaw is not considered to have an adverse impact on Penshaw Monument. The SS7 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 housing requirement and contribute to townscape quality. It is not considered to conflict with the aims of Policy BH8.
- 11.172 The Council considers this policy to guide development so that designated heritage assets are conserved and enhanced; as well as any contribution made by their setting. With regard to non-designated heritage assets, the Council has reconsidered this policy’s approach. Policy BH8.8 will no longer require non-designated assets to be conserved and enhanced but their significance taken into account. Further explanation can be found in the ‘amendments to the draft plan section’.

Reasonable Alternatives

11.173 The Council does not consider there are any reasonable alternatives.

Effective Deliverable

- 11.174 The policy will primarily be delivered through the determination of planning applications. The delivery of regeneration, restoration and environmental improvement schemes that may be supported with funding will also support delivery of some aspects of the policy, for example 4(iii).
- 11.175 A Heritage Statement must accompany all applications that affect heritage assets and should describe the significance of the heritage asset and the impact of the proposals on its significance. Development that affects Listed Buildings requires Listed Building Consent, and development within Conservation Areas will be considered against relevant CAMS reports. Article 4 Directions will continue to be used as an effective way of conserving the character and appearance of Conservation Areas. The County Archaeologist (and where appropriate, Historic England) will provide advice and recommendations relating to development proposals.
- 11.176 Consultation will take place with Council Conservation Officers on planning applications to ensure development proposals conserve and enhance the historic environment. The Council will continue to work with partners, property owners and developers, and bid for grant funding from organisations such as Heritage Lottery Fund and Historic England to collaboratively deliver regeneration schemes that repair, restore and return into viable and sustainable uses heritage assets, and deliver wider improvements to the historic environment.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
BH8	Heritage	Aims to	• Significant loss	• Identify	• Appeals	• SCC monitoring

	Assets	protect and enhance the City's historic assets	<p>of , harmful impacts or deterioration of heritage and archaeologically -important assets</p> <ul style="list-style-type: none"> • Significant number of applications approved contrary to heritage policy and guidance • Increased number of heritage assets on Heritage at Risk Register, or otherwise identified as being at risk • Lack of progress in adopting CAMS 	<p>reasons for lack of implementation / decisions contrary to policy</p> <ul style="list-style-type: none"> • Review objectives of policy with key partners and stakeholders, including Historic England and Tyne & Wear Specialist Conservation Team • Potential review of the Plan/Policy • Identify potential activities / interventions to address issues, including reviewing funding opportunities 	<p>allowed in conservation areas, and for applications affecting listed buildings, schedule ancient monuments, historic parks and gardens and non-designated heritage assets</p> <ul style="list-style-type: none"> • Number of Grade I and II* Listed Buildings, Scheduled Monuments and Conservation Areas on Historic England's 'Heritage at Risk' Register 	<p>data</p> <ul style="list-style-type: none"> • Planning applications • Conservation Area Character Appraisals and Management Strategies (CAMS) • Historic England – Heritage at Risk Register • Tyne & Wear Historic Environment Records
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Consistent with National Policy

11.177 The policy is in accordance with the NPPF and reflects the criteria set out in paragraph 126. The policy supports and provides further detail on the provisions of NPPF paragraphs 131 – 141, including providing guidance for the demolition of listed buildings and buildings within conservation areas.

BH9 Archaeology and Recording of Heritage Assets

11.178 This policy seeks to ensure the preservation, excavation and recording of archaeological remains in line with national policy.

BH9 Archaeology and Recording of Heritage Assets

1. Development which adversely affects the archaeological interest or setting of a Scheduled Ancient Monument (or non-designated heritage asset of equivalent significance) will be refused planning permission unless wholly exceptional circumstances exist that satisfy the requirements of the NPPF.
2. The council will support the preservation, protection and where possible the enhancement of the city's archaeological heritage by requiring that:
 - i. applications that may affect buried archaeological remains must be supported by an archaeological desk-based assessment and evaluation reports where appropriate;
 - ii. where development affects heritage assets of archaeological interest, preference will be given to preservation in situ. However where loss of the asset is justified in accordance with national policy, the remains should be appropriately archaeologically excavated and recorded, the findings assessed and analysed, the resulting archive report deposited with the Tyne and Wear Historic Environment Record and the physical archive deposited with the relevant collecting museum. Significant findings will also be published in an archaeological journal to make them publicly accessible and to enhance understanding; and
 - iii. where demolition or part demolition of a designated built heritage asset or non-designated building of significance has been justified, or substantive changes are to be made to the asset,

works must not commence until archaeological building recording of the asset has been carried out and the results deposited with the Historic Environment Record and Tyne and Wear Archives.

Positively Prepared

Vision

11.179 This policy will deliver the spatial vision and strategic priorities by ensuring the Plan area has a high quality natural, built and historic environment.

11.180 Policy BH9 will help to deliver Strategic Priority 7.

Draft Plan Comments

11.181 This is a new policy so there were no comments received. However, the creation of the policy is in response to representations from Historic England and from the Tyne and Wear Archaeology Officer.

How Issues Have Been Taken into Account at Publication Draft

11.182 The creation of the policy is in response to representations from Historic England and from the Tyne and Wear Archaeology Officer.

Publication Draft Comments

11.183 As set out in the Consultation Statement (SD.7)⁴⁴⁶, the following issues were raised during Publication Draft consultation;

- Historic England (PD109) support the approach, however part 1 needs clarification in accordance with paragraph 132 and 133 of the NPPF.
- Burdon Lane Consortium (PD2599) suggests part 2(i) of Policy BH9 should seek to sustain, conserve and enhance as opposed to protect. The Policy is more onerous than the NPPF as this does not require the preservation of archaeology in situ.

How Issues Have Been Taken into account prior to Submission

11.184 In response to the representation raised by Historic England (PD109), the Council has proposed additional modifications as part of a Statement of Common Ground (SD08.k)⁴⁴⁷, which are set out in the Schedule of Modifications (M52 and M53).

11.185 The Council agrees with Historic England that Policy BH9.1 could be amended to more closely align with the NPPF. The Council agrees with Historic England that Policy BH9.1 should also recognise non-designated assets of equivalent archaeological significance. In response to Burdon Lane Consortium (PD2599), the Council considers this Policy to be consistent with the NPPF. 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.

Proposed Modifications to the Publication Draft

11.186 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
BH9.1	Development which adversely affects the	To address representations submitted by

⁴⁴⁶ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

⁴⁴⁷ https://www.sunderland.gov.uk/media/21012/SD-8j-Unduly-Made-Representations/pdf/SD.8j_Unduly_Made_Representations.pdf?m=636808180571630000
https://www.sunderland.gov.uk/media/21024/SD-8k-Statements-of-Common-Ground/pdf/SD.8k_Statements_of_Common_Ground.pdf?m=636808426509800000

	archaeological interest or setting of a Scheduled Ancient Monument (<u>or non-designated heritage asset of equivalent significance</u>) will be refused planning permission unless...	Historic England (PD109). The Council have also signed a Statement of Common Ground (SD08.k).
BH9.1	...will be refused planning permission unless wholly exceptional circumstances exist that satisfy the requirements of the NPPF.	To address representations submitted by Historic England (PD109). The Council have also signed a Statement of Common Ground (SD08.k).

Duty to Cooperate (SD.11)⁴⁴⁸

11.187 The Council has worked proactively with Prescribed Bodies at each stage of Plan preparation and consultation and has met with Historic England in 2017 and 2018 to discuss the emerging Core Strategy and Development Plan. Historic England made several representations during consultation on the Publication Draft Plan. The Council and Historic England have signed a Statement of Common Ground (SD08.k) which agrees several minor modifications to sections of the Plan which refer to heritage and the historic environment. This engagement is set out in the Duty to Cooperate Statement (SD.11).

Sustainability Appraisal (2017) (SD.12)⁴⁴⁹

11.188 The following table is a visual summary of the detailed assessment provided in SA Appendix D (the policy covered both Heritage Assets and Archaeology). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

11.189 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD.5)⁴⁵⁰

11.190 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	-	~	~	~	~	++	~	~	~	~	~	++	+

11.191 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

11.192 The city's archaeological remains are a rare record of the evolution of civilisation in Sunderland. The Tyne and Wear Historic Environment Record (HER)⁴⁵¹ is compiled, maintained and continually updated by the County Archaeologist on behalf of the five Tyne and Wear authorities. The HER contains information on archaeological sites, finds, historic

⁴⁴⁸ [https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Cooperate_Statement_(2018).pdf?m=636808429133300000)

⁴⁴⁹ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

⁴⁵⁰ [https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_\(2018\).pdf?m=636802911436500000](https://www.sunderland.gov.uk/media/20851/SD-5-Sunderland-Publication-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2018-/pdf/SD.5_Sunderland_Publication_Draft_CSDP_Sustainability_Appraisal_incorporating_SEA_(2018).pdf?m=636802911436500000)

⁴⁵¹ <https://www.newcastle.gov.uk/planning-and-buildings/conservation-heritage-and-urban-design/historic-environment-and-heritage/historic-environment-record-her->

buildings, industrial and war time sites. Excavation reports, desk based assessments and other grey literature, books and journals, photographs and maps. The Council takes a proactive approach towards this gathering of information for inclusion in the HER. The Council is required in accordance with national policy to make publicly available information on the significance of heritage assets gathered as part of plan-making or development management.

11.193 This evidence has informed Policy BH9, which seeks to ensure the preservation, excavation and recording of archaeological remains in line with national policy. Preference is given to the preservation of heritage assets of archaeological interest in situ, though it is acknowledged this may not always be possible. There are two proposed amendments to the policy which are outlined in the 'amendments to the draft plan' section. These changes will ensure that the policy is consistent with national policy.

Reasonable Alternatives

11.194 The Council does not consider there are any reasonable alternatives.

12. Natural Environment

NE1 Green Infrastructure

12.1 This policy seeks to maintain and improve green infrastructure across the city.

NE1 Green and Blue Infrastructure

1. To maintain and improve the Green Infrastructure Network through enhancing, creating and managing multifunctional greenspaces and bluespaces that are well connected to each other and the wider countryside, development should:
 - i. incorporate existing and/or new green infrastructure features within their design and to improve accessibility to the surrounding area;
 - ii. address corridor gaps and areas of corridor weakness where feasible;
 - iii. support the management of existing wildlife corridors, including reconnecting vulnerable and priority habitats (see policy NE2);
 - iv. apply climate change mitigation and adaptation measures, including flood risk and watercourse management;
 - v. link walking and cycling routes to and through the corridors, where appropriate;
 - vi. include and/or enhance formal and natural greenspace and bluespace provision;
 - vii. protect and enhance landscape character; and
 - viii. have regard to the requirements of the Green Infrastructure Delivery Plan and make contributions proportionate to their scale towards the establishment, enhancement and on-going management.
2. Development that would sever or significantly reduce green infrastructure will not normally be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts and suitable mitigation and/or compensation is provided.

Positively Prepared

Vision and Strategic Priorities

12.2 The policy will assist the delivery of the spatial vision by supporting a network of green infrastructure, which in turn supports and protects biodiversity and wildlife, whilst also improving access for all. The policy also supports access to useable open space, leisure and recreation, supports high quality natural, built and historic environments and supports climate change resilience.

12.3 Policy NE1 will help to deliver Strategic Priorities 2, 3, 8 and 9.

Draft Plan Comments

- 12.4 As set out in the Consultation Statement (SD.7⁴⁵²), the following issues were raised during the draft Plan consultation:
- A resident is concerned that the GI network is not precise or clear and therefore it is difficult to identify the boundaries of the network.
 - Northumbrian Water support the policy and request a reference to flood risk. CPRE also support the policy but request a reference to blue spaces and waterways.
 - The Environment Agency suggests that the wording reflect that watercourses are wildlife corridors and they should be retained.
 - Siglion support the Policy. Developers including Taylor Wimpey, Siglion and Hellens request revisions to the Policy as they consider it to be too prescriptive.
 - Historic England request that reference is include to the contribution historic assets can make to the GI network.

⁴⁵² [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=63680735162640000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=63680735162640000)

How Issues Have Been Taken into Account at Publication Draft

- The Plan has been updated to reflect the outcomes of the Green Infrastructure Strategy (SD.46⁴⁵³). The Allocations and Designations Plan will designate the GI network.
- In response to the Northumbrian Water, Environment Agency and CPRE comments, the Policy has been updated to include a reference to bluespaces and to flood risk and watercourse management.
- In relation to the developers' comments, the policy was reviewed and partly amended to make the approach less prescriptive.
- Historic England's comment has been incorporated into the text as requested.

Publication Draft Comments

12.5 As set out in the Consultation Statement (SD.7⁴⁵⁴), the following issues were raised during Publication Draft consultation:

- 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;
- Historic England (PD110) welcome this policy, in particular the recognition (in paragraph 10.2) that GI can include historic environments;
- Natural England (PD2762) welcomes Policy EN1 on Green Infrastructure (GI) and in particular the focus on the multi-functional character of GI and the link to the GI Delivery Plan;
- The Environment Agency (PD212 & PD213) supports the policy but suggest a number of modifications to the policy and supporting text;
- A land owner Colin Ford (PD178) considers the policy to be unsound as it does not acknowledge the potential for development to enhance existing ecological area and green infrastructure;
- CPRE (NE) (PD1181) sets out that a Natural Capital approach should be referenced in the Plan, ensuring that development, where appropriate, takes it into account and applies its principles. Blue space needs to be mentioned in the Glossary;
- Church Commissioners For England (PD1790) set out that Policy 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 GI corridor shown on Figure 40 should be removed at South Ryhope and Philadelphia;
- Persimmon Homes (PD4127) have concerns with the identification of a district corridor in 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;
- Persimmon Homes (PD1961) also object 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;
- Springwell Village Residents Association (PD5068) state that sites HGA1, 2 and 3 would conflict with Policy NE1 as they have wildlife corridors which will be affected by development;
- Taylor Wimpey (PD3769) supports the policy as well as Figure 40 and paragraph 10.5;

⁴⁵³ [https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_\(2018\).pdf?m=636802959791130000](https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_(2018).pdf?m=636802959791130000)

⁴⁵⁴ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- A resident (PD3250) supports Policy NE1, which reflects National Guidance in the NPPF.

How Issues Have Been Taken into account prior to Submission

- 12.6 The Council acknowledges support for the policy from Northumbrian Water, Historic England, Natural England, Taylor Wimpey and comment from a resident. In response to the representations raised by the Environment Agency (PD212 & PD213), the Council has proposed minor modifications as set out in the Schedule of Modifications (M54, M55, M57 & M87).
- 12.7 In response to the comment raised by the land owner, Mr Ford, the Council disagrees with this assumption and would reiterate that the policy states that in order to maintain and improve the GI network, development should address the points listed. At no point does this policy 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.
- 12.8 In response to CPRE, 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. Bluespaces are now included in the Glossary (M87).
- 12.9 In response to sites put forward by the Church Commissioners and Persimmon Homes, the Council does not feel it necessary to make any modifications to the Plan and to Figure 40 as the policy requirements are not considered to be onerous, and that the identified GI corridors are appropriate and are justified through the GI Strategy Framework (SD.46⁴⁵⁵). Further detail regarding the corridors can be considered in the forthcoming GI Delivery Plan and the Allocations & Designations Plan.
- 12.10 In relation to Permission Homes comment regarding incorporation of GI, the Council does not feel it necessary to make any modifications to this policy. The Council considers that the policy does not preclude development from within these corridors but seeks to protect corridor connectivity and function, and 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.
- 12.11 In relation to Springwell Village Residents Association comment, the Council has provided detailed responses regarding sites HGA1, HGA2 and HGA3 under Policy SS2 and considers that the impact to these corridors is minor and can be adequately mitigated for.

Proposed Modifications to the Publication Draft

- 12.12 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
NE1	NE1 Green <u>and Blue</u> Infrastructure	To address representations submitted by the Environment Agency (PD213). The Council have also signed a Statement of Common

⁴⁵⁵ [https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_\(2018\).pdf?m=636802959791130000](https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_(2018).pdf?m=636802959791130000)

		Ground (SD8.k).
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, <u>water dependent habitats</u> and the sea.	To address representations submitted by the Environment Agency (PD212). The Council have also signed a Statement of Common Ground (SD.8k)

Duty to Cooperate (SD11)

- 12.13 Gateshead Council has raised concern that proposed Green Belt development sites would negatively impact on the strategic Green Infrastructure corridor between Sunderland and Gateshead. Meetings have taken place to discuss this matter further, discussing in more detail the impact to the gap, whereby it was agreed that there is little or no impact from the Green Belt release sites east of Springwell Village and at High Usworth, and only slight impact to the southwest of Springwell Village. North of Usworth Hall, it was agreed that both local authorities were planning to reduce the Green Belt gap.
- 12.14 South Tyneside Council had initially raised concern regarding the potential for development sites to impact on the strategic Green Infrastructure and wildlife gap between Sunderland and South Tyneside. Meetings took place to discuss these matters, and South Tyneside MBC put forward comments to the Publication Draft Plan that welcome the proposed Housing Growth and Regeneration Areas within North Sunderland and the policy requirements to maintain and strengthen the wildlife and green infrastructure corridors.
- 12.15 Durham County Council raised the need for a specific policy relating to the Heritage Coast, which spans the Sunderland and Durham coastline, and forms a strategic GI corridor. Meetings took place to discuss this matter further, and the Publication Draft Plan now includes a specific Heritage Coast policy. Durham County Council has acknowledged the inclusion of the policy and are satisfied with the approach.

Sustainability Appraisal (2017)

- 12.16 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
								?						

- 12.17 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

- 12.18 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	+	~	++	+	++	+	++	+	+	++	~	+	+

- 12.19 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

- 12.20 Sunderland's Green Infrastructure (GI) comprises the strategic network of undeveloped land, comprising green, brown and blue spaces that define, connect and intersperse our built

environments. These deliver a wide range of socio-economic and environmental benefits, central to the quality of life and economic sustainability of our neighbourhoods and society as a whole. They define our settlements, whilst providing a connected landscape within which biodiversity, natural processes and ecosystem services can function. The natural capital derived from Green Infrastructure will become increasingly important to support sustainable growth alongside climate change and population expansion. Sunderland's Green Infrastructure network is shown on the map below:

12.21 The 2018 Sunderland Green Infrastructure Strategy (SD46⁴⁵⁶) provides an up-to-date evidence base and framework for GI delivery throughout the Plan's implementation. It identifies and justifies a set of district and inter-district Green Infrastructure Corridors and provides an overview of where enhancements to

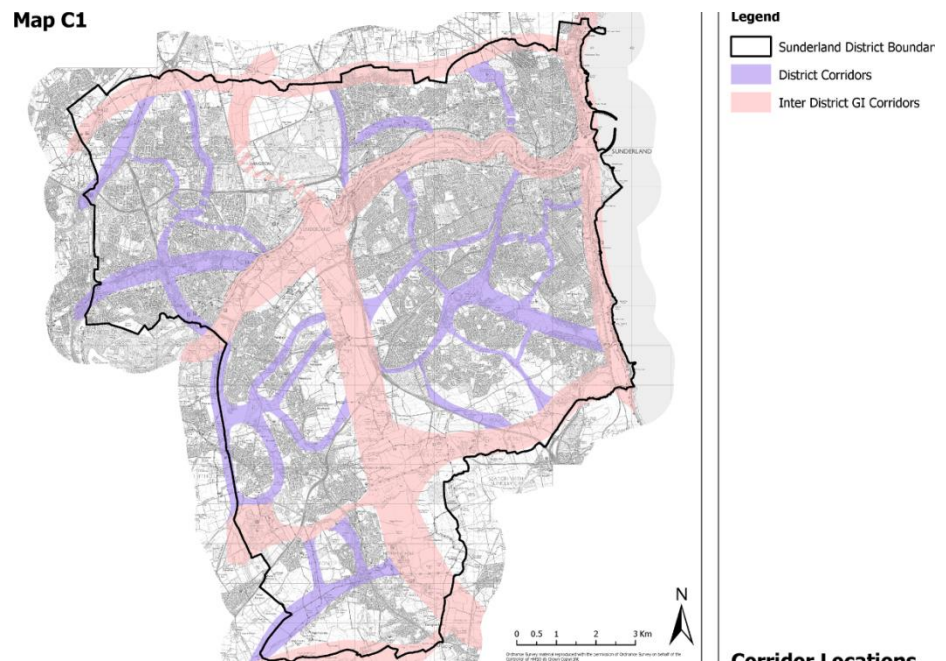


Figure 51 Green Infrastructure Corridors

promote GI could deliver the greatest benefits for wildlife and people. It highlights locations in the city where there is the greatest potential for economic, social, environmental and multifunctional outcomes from GI interventions.

12.22 The NPPF makes clear the strategic importance of Green Infrastructure. Paragraph 114 states that Local Planning Authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. Paragraph 99 further states that Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape, and that care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.

12.23 The title of the policy has been expanded to include bluespaces (following comments received from the Environment Agency), which reflects latest thinking with regards to Green Infrastructure planning, and is referenced in the Government's 25 Year Plan to improve the Environment.

12.24 Both the NPPF and the Government's 25 Year Plan advocate actions/policies that create more Green and Blue Infrastructure that benefit wildlife (including corridor connectivity), people (including connected walking and cycling corridors), improve landscape character

⁴⁵⁶ [https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_\(2018\).pdf?m=636802959791130000](https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-/pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_(2018).pdf?m=636802959791130000)

and quality and apply climate change mitigation (including flood risk and watercourse management). The Sunderland Green Infrastructure Strategy (SD.46) justifies this approach, and development will be guided via the city's Green Infrastructure Delivery Plan.

- 12.25 The Council would reiterate that GI corridors are not intended to preclude development from occurring within these corridor areas (see Paragraph 4.6 of the Sunderland GI Strategy Framework, SD.46). The GI Strategy states clearly that corridor connectivity is paramount, and it specifically identifies current barriers to connectivity that should be addressed. Part 2 of the policy, likewise, 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 114, and therefore the Council considers that the correct policy wording is sound.
- 12.26 The Council would also reiterate that the policy states that in order to maintain and improve the GI network, development should address the points listed. The Council recognises that not all development will have an adverse impact on Green Infrastructure. The Council agrees that it is possible for development to achieve net gains to GI corridors.
- 12.27 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 NPPF (which makes no mention of natural capital), no alteration is therefore supported. A definition of bluespaces has been included in the Glossary (M87).

Reasonable Alternatives

- 12.28 Both the Church Commissioners and Persimmon Homes have objected to the policy and the supporting map (SD.1, Figure 40) which shows (in broad strategic terms) the alignment of GI corridors across the city impacting on development sites that they have put forward, and that therefore these corridor alignments need to be amended. In terms of the Church Commissioners objection, the Council would note that Paragraph 10.6 of the Plan makes clear that the Allocations & Designations Plan will identify land to deliver this policy, and therefore not the Core Strategy and Development Plan- the alignment shown in Figure 40 (SD.1) is an indicative strategic-level map. 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 site at South Ryhope forms part of the SSGA Masterplan, which has considered GI across this area already. This Masterplan will inform the GI Delivery Plan in due course. The alternative proposals by the Church Commissioners are therefore not supported by the Council.
- 12.29 In relation to the Persimmon Homes objection, the Council acknowledges that changes have been made to this area, and that recent planning approvals will narrow the GI corridor in question considerably, to the south of Coaley Lane. Nevertheless, the Corridor remains in place 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.

- 12.30 Springwell Village Residents Association raise objection that GI corridors are compromised by sites HGA1,2 &3. The Council has provided detailed responses regarding these sites under Policy SS2 and considers that the impact to these 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).
- 12.31 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.

Effective Deliverable

- 12.32 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. GI Corridors will be identified via the Allocations and Designations Plan, and this will be supported by a forthcoming GI Delivery and Action Plan to help prioritise and deliver schemes. Where feasible and appropriate, S106 funding will be sought to support scheme delivery.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE1	Green Infrastructure	Aims to protect, enhance and manage the city's green infrastructure network	Significant number of applications approved contrary to Green Infrastructure Strategy and policy Significant loss of green infrastructure Significant loss of areas of identified wildlife corridors	Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Identify potential activities/interventions to address issues	Planning applications received/granted within areas of green infrastructure network Appeals allowed for applications within areas of green infrastructure network Net gain/loss of areas of green infrastructure	SCC monitoring data Planning applications Green Infrastructure Delivery Plan

Consistent with National Policy

- 12.33 Policy NE1 is consistent with Section 11 of the NPPF which seeks to conserve and enhance natural environments. More specifically NPPF Paragraph 114 identifies that Local Plans should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure, which Policy NE1 makes provision for. Paragraph 99 further states that Local Plans should take account of climate change over the

longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape, and that care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of Green Infrastructure.

NE2 Biodiversity and Geodiversity

12.34 This policy seeks to protect, create, enhance and manage biodiversity and geodiversity across the city.

NE2 Biodiversity and Geodiversity

1. ~~Biodiversity and geodiversity will be protected, created, enhanced and managed by requiring development to~~ Where appropriate, development must demonstrate how it will:
 - 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;
imperative reasons of overriding public interest;
 - ii. necessary compensatory provision can be secured to ensure that the overall coherence of the Natura 2000 network of European sites is protected; and
 - iii. 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:
 - 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;
6. development proposals 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.

Positively Prepared

Vision and Strategic Priorities

12.35 The policy will assist the delivery of the spatial vision by supporting a network of Green Infrastructure, which in turn supports and protects biodiversity and wildlife. The policy also supports high quality natural and built environments and supports climate change resilience.

12.36 Policy NE2 will help to deliver Strategic Priorities 2 and 8.

Draft Plan Comments

12.37 As set out in the Consultation Statement (SD.7⁴⁵⁷), the following issues were raised during the draft Plan consultation:

- A resident was concerned that the Plan does not show on the Policies Map where the wildlife corridors are.
- CPRE supports the majority of the Policy but does not agree with the reference to 'where appropriate'.
- Natural England supports the policy but suggest alternative wording.
- Siglion would like the Policy to be amended and strengthened in relation to HRA.
- Persimmon, Taylor Wimpey and Hellens requested the policy be amended in relation to net gains in biodiversity in accordance with the NPPF.

How Issues Have Been Taken into Account at Publication Draft

- Alternative wording put forward by Natural England has been incorporated into the policy.
- The reference made by CPRE has now been removed from the opening sentence of the Policy.
- In relation to Siglion's request, the policy has been revised and now refers to any development that would have an impact on the integrity of European sites having to be fully assessed, including necessary compensation to be secured.
- In response to Persimmon, Hellens and Taylor Wimpey's comments, recent Government policy has strengthened and clarified with regards to "net gains" and only minor changes to the wording are therefore proposed.
- Designations for Wildlife and LNRs will not be made until Part 2 of the Local Plan, the Allocations and Designations Plan, which formally review and designate.

Publication Draft Comments

12.38 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Natural England (PD2751) sets out broad support for much of the policy including support for inclusion of net gains for biodiversity. However, they 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;
- Historic England (PD111) welcome the recognition that burial spaces are often of historic interest and included designated assets;
- Story Homes (PD5341) state that 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;
- Bellway Homes (PD1970) does not object to principles of Policy NE2, however Part 4 is not considered to be consistent with the NPPF, which allows for adverse impacts where mitigation can be offered;
- Hellens Land Ltd (PD5080) and Taylor Wimpey (PD3784) set out general policy support but minor changes are requested to NE2 (1) and (6), and they also state that paragraphs 10.14 and 10.5 conflict in relation to wildlife corridors and GI corridors;
- Siglion (PD3147) are concerned that 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;

⁴⁵⁷ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- Church Commissioners of England (PD1795 & PD5249) considers the policy does not accord with national guidance- policy is too prescriptive with regards to net gains in biodiversity;
- Northumbrian Water (PD2656) state that 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.
- Burdon Lane Consortium (PD2679) welcome changes to Policy NE2 from the previous draft, but further minor changes are required to make policy effective;
- A landowner, Mr. Ford (PD179), sets out that the policy is unsound as it is deficient in including a section which acknowledges this potential, and should be amended to encourage development which has the ability to deliver positive benefits to the biodiversity and geodiversity of the area;
- A resident (PD3251) supports the policy.

How Issues Have Been Taken into account prior to Submission

- 12.39 In response to the representations raised by Natural England (PD2751), the Council has proposed minor modifications as set out in the Schedule of Modifications (M58). The Council acknowledges the support from Historic England and from the local resident.
- 12.40 In response to Story Homes comment, 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. In response to the representations raised by the Church Commissioners (PD1795 & PD5249) Northumbrian Water (PD2656), Taylor Wimpey (PD3784) and Hellens Land (PD5080), the Council has proposed minor modifications as set out in the Schedule of Modifications (M56).
- 12.41 In response to Bellway Homes, 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 NPPF.
- 12.42 In response to Siglion, 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 (SD.10). 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.
- 12.43 In response to Burdon Lane Consortium (PD2679) 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.

Proposed Modifications to the Publication Draft

- 12.44 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
NE2	<p>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></p> <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 accordance with the mitigation hierarchy; <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> <ul 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. <u>development that would adversely affect a Site of Special Scientific Interest, either directly or indirectly, will be required to demonstrate that:</u></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. <u>development that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</u></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>For clarity and consistency and to reflect the duty to cooperate with Gateshead and South Tyneside Council's. Also, in response to representations from the Church Commissioners of England (PD1795 and PD5249), Northumbrian Water (PD2656), Taylor Wimpey (PD3784), and Hellens (PD5080).</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</p> <p>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 <u>development</u> 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>	
10.8	Not identified as a conservation priority but which are considered locally important <u>including water-dependent, aquatic and marine habits and species.</u>	To address representations submitted by the Environment Agency (PD212). The Council have also signed a Statement of Common Ground (SD8.k)
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>	To address representations submitted by Natural England (PD2751). The Council have also signed a Statement of Common Ground (SD8.k)
10.16	The forthcoming Biodiversity and Geodiversity SPD will support the natural environment policies, <u>and this will include clarification regarding the types of development that require delivery of net gains in biodiversity.</u> The A&D Plan will identify land to deliver this policy.	For clarity of Policy NE2

Duty to Cooperate (SD11)

12.45 Meetings have taken place between Sunderland, Gateshead and South Tyneside Council's to consider this policy further, and to agree a common policy approach across the three

authorities. Minor modifications have been agreed and made to the policy, chiefly relating to the policy format, as opposed to policy content.

- 12.46 Meetings between Sunderland Council and Natural England have taken place as the policy has been reviewed, and the policy (and supporting text) has been subsequently updated, especially in relation to the Natura 2000 network of European sites. In addition, the opening to the policy has been agreed to be updated to read: "Where appropriate, development must demonstrate how it will:". As agreed in the Statement of Common Ground (SD.8k), Natural England, the Council and Hellens have agreed that an HRA must be undertaken for site HGA7. Following approval from the Council and Natural England the CSDP HRA (SD.10⁴⁵⁸) will be updated to reflect the site HRA and submitted during the EIP.

Sustainability Appraisal (2017)

- 12.47 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

- 12.48 The SA made the following recommendation for changes to be made to the draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	To provide appropriate protection for designated sites, in accordance with legislative requirements and the NPFF it is recommended that Policy E7 – Biodiversity and Geodiversity should be expanded to include criteria to assess the acceptability of adverse impacts on protected species.	No further addition proposed for text. Additional wording to be included in supporting text.

Sustainability Appraisal (2018) (SD5)

- 12.49 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	+	~	~	+	~	++	++	~	+	~	~	~	+

- 12.50 The SA made the following recommendation for changes to be made to the Publication Draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
The first and second criteria of this policy are repetitive and read together are not fully clear due to	Recommendation agreed and implemented.

⁴⁵⁸ [https://www.sunderland.gov.uk/media/21026/SD-10-Report-to-Inform-Habitats-Regulations-Assessment-2018-/pdf/SD.10_Report_to_Inform_Habitats_Regulations_Assessment_\(2018\).pdf?m=636808428012500000](https://www.sunderland.gov.uk/media/21026/SD-10-Report-to-Inform-Habitats-Regulations-Assessment-2018-/pdf/SD.10_Report_to_Inform_Habitats_Regulations_Assessment_(2018).pdf?m=636808428012500000)

<p>their overlap. To address this, the criteria should be recast, with the first requiring proposals to demonstrate net biodiversity gain and the second requiring the avoidance of significant harm (as well as potentially the minimisation of adverse impacts) to biodiversity or geodiversity interests. In line with the NPPF this second criterion should as a minimum require avoidance of significant harm through alternative location of development or the appropriate implementation of the mitigation hierarchy. Building on the current policy wording, the criterion could also require the assessment and minimisation of any likely adverse effects on biodiversity and geodiversity (i.e. as well as simply avoiding significant harm as required by the NPPF).</p>	
<p>The difference between the level of protection afforded to (statutory) SSSIs and (non-statutory) LWS or LGS in criteria four and five is not clear. It is also not clear how the need to safeguard the intrinsic value of a LWS or LGS would be objectively assessed. To accord with the NPPF (paragraph 113) these criteria should be amended to set out more distinct and clearer policy tests for proposals affecting statutory and non-statutory designations.</p>	<p>We consider that the SSSI policy is clear in its approach. Further clarity regarding the approach to determining these impacts will be provided through the forthcoming Biodiversity and Geodiversity SPD- 'intrinsic' value, and will be included in the Glossary.</p>
<p>The reference to buffer zones (in relation to designated sites) within the supporting text to this policy is not clear and should be deleted or at least clarified. Most designated sites do not have defined buffer zones and whilst this wording reads like a policy test, as supporting text it cannot set a substantive requirement not contained in Policy NE2.</p>	<p>The policy refers to proposals directly and indirectly affecting a site. The supporting text makes clear that the buffer zones relate to this aspect of the policy. The supporting text has been amended though to state 'appropriate' buffer zones and that these will vary on a case by case basis.</p>

Justified

12.51 Local authorities are required by national and European policy to protect valued landscapes, minimise impacts on biodiversity and provide net gains in biodiversity where possible, aiming to halt the decline in biodiversity that has occurred in recent years. The policy is in compliance with NPPF Paragraph 113 which stipulates that local planning authorities should set criteria based policies against which proposals for development on or affecting protected wildlife, geodiversity sites or landscape areas should be assessed. The policy takes account of the hierarchy of international, national and locally designated sites and provides a development framework to assess applications in order to minimise development impacts on biodiversity and geodiversity assets in accordance with NPPF Paragraphs 116 - 118. The approach in this policy towards the protection of habitat, species and to wildlife corridors also reflects joint working with the Local Nature Partnership and with neighbouring local authorities in north east England.

12.52 With regards to providing net gains in biodiversity, the Council has revised the wording to state “where appropriate”, with regards to development, as set out in the Schedule of Modifications (M56). This followed objections raised by a number of developers and landowners who had considered the policy to be too prescriptive and not consistent with national policy. The Council’s approach towards net gains in biodiversity follows a joint policy approach with Gateshead and South Tyneside Council’s, and has been endorsed by Natural England. 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 Government’s 25 Year Plan to Improve the Environment⁴⁵⁹ 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.

12.53 The Council, together with neighbouring local authorities, have worked jointly to ensure a consistent policy approach is reached regarding biodiversity and geodiversity, in order to best reflect the hierarchy of site protection through policy.

12.54 The Allocations and Designations Plan will identify land to deliver this policy, and will be supported by the forthcoming Biodiversity and Geodiversity SPD.

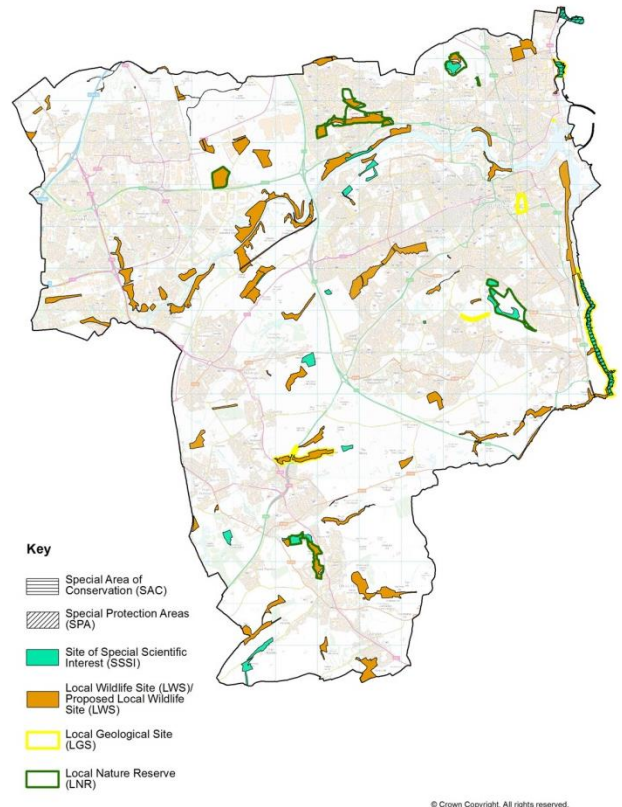


Figure 52 Protected Wildlife Sites

Reasonable Alternatives

12.55 Natural England has raised concern (PD2751) in reference to the mitigation measures proposed in the Habitats Regulations Assessment for the Publication Draft Plan. Further discussions have taken place, the HRA has been updated and the Council and Natural England have addressed these concerns through a Statement of Common Ground (SD.8k).

12.56 In response to Burdon Lane Consortium (PD2679), Hellens Land (PD5080), Taylor Wimpey (PD3784), Story Homes (PD5341) and landowner Mr Ford (PD179), the Council would note that GI corridors and wildlife corridors are different, and require different degrees/types of protection, which is reflected in Policies NE1 and NE2. The additional text of criterion (6) of PolicyNE2 is not supported as it constitutes a significant weakening of the policy which seeks to protect corridors from significant adverse effects.

12.57 In response to Bellway Homes (PD1970), the Council considers that no modifications are necessary because 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 this is in line with Paragraph 113 of the NPPF.

12.58 In response to Siglion’s comment (PD3147), the Council has undertaken HRA (SD.10) for all allocated sites for the Plan, and as a result, 2 sites have been identified as having a

⁴⁵⁹ “A Green Future: Our 25 Year Plan to Improve the Environment”, HM Government. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

potential impact on the European sites. Mitigation measures have been identified for both of these sites and are included in the HRA for the Plan. This Plan does not allocate housing sites- 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.

Effective Deliverable

12.59 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. The forthcoming Biodiversity and Geodiversity SPD will provide clarity regarding information required to support planning decisions whilst also providing detailed guidance in relation towards suitable mitigation in relation to development proposals. The Allocations and Designations Plan will identify land to deliver this policy. Where feasible and appropriate, S106 funding will be sought to support scheme delivery.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE2	Biodiversity and geodiversity	Aims to protect, enhance and manage the City's biodiversity and geodiversity assets	<ul style="list-style-type: none"> Loss or reduction in area of designated sites Change in condition of designated sites Change in status of species and habitats of principal importance No net gain or a net loss in biodiversity 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review objectives of the policy, in partnership with key stakeholders Identify potential measures to address issues Implement a programme of measures, and monitor and review progress 	<ul style="list-style-type: none"> Planning applications approved affecting nature conservation Change in area of designated sites as a result of planning approval 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Natural England ERIC NE

Consistent with National Policy

12.60 Policy NE2 is in compliance with NPPF Paragraph 113 which stipulates that Local Planning Authorities should set criteria based policies against which proposals for development on or affecting protected wildlife, geodiversity sites or landscape areas should be assessed. The policy takes account of the hierarchy of international, national and locally designated sites and provides a development framework to assess applications in order to minimise

development impacts on biodiversity and geodiversity assets in accordance with NPPF Paragraphs 116 - 118.

NE3 Woodland/Hedgerows and Trees

12.61 This policy seeks to conserve woodlands, hedgerows and trees across the city.

NE3 Woodlands/Hedgerows and Trees

To conserve significant trees, woodlands and hedgerows, development should:

1. only be permitted where it can clearly demonstrate that development cannot reasonably be located elsewhere;
2. follow the principles below to guide the design of development where effects to ancient woodland, veteran/aged trees and their immediate surroundings have been identified:
 - i. avoid harm;
 - ii. provide unequivocal evidence of need and benefits of proposed development;
 - iii. provide biodiversity net gain;
 - iv. establish likelihood and type of any impacts;
 - v. implement appropriate and adequate mitigation and compensation;
 - vi. provide adequate buffers; and
 - vii. provide adequate evidence to support proposals;
3. retain, protect and improve woodland, trees subject to Tree Preservation Orders (TPOs), trees within Conservation Areas, and 'important' hedgerows as defined by the Hedgerows Regulations 1997;
4. give consideration to trees and hedgerows both on individual merit as well as their contribution to amenity and interaction as part of a group within the broader landscape setting; and
5. ensure that where trees, woodlands and hedgerows are impacted negatively by proposed development, justification, mitigation, compensation and maintenance measures are provided in a detailed management plan.

Positively Prepared

Vision and Strategic Priorities

12.62 The policy will assist the delivery of the spatial vision by supporting a network of Green Infrastructure, which in turn supports and protects biodiversity and wildlife. The policy also supports high quality natural, built and historic environments and supports climate change resilience.

12.63 Policy NE3 will help to deliver Strategic Priority 8.

Draft Plan Comments

12.64 As set out in the Consultation Statement (SD.7⁴⁶⁰), the following issues were raised during the draft Plan consultation:

- Residents welcome the policy but request the Council adopts the woodland access standards.
- The Woodland Trust also request that the Council adopted the woodland access standards.
- The CPRE has requested further clarity regarding the approach towards ancient woodland and veteran trees.
- Developers including Hellens, Taylor Wimpey and Esh request that the policy is amended in accordance with the NPPF.

⁴⁶⁰ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

How Issues Have Been Taken into Account at Publication Draft

- In relation to the CPRE request, further clarity has now been provided in relation to ancient woodland and veteran trees.
- In relation to The Woodland Trust and resident's request for woodland access standards to be adopted, the Council already maps access to woodland (Woodland Trust standards) in the city's Greenspace Audit and Report (SD.47), and this is supported by the Greenspace policy. Further clarity is also provided relating to ancient woodland and veteran trees.
- In response to developer's comments, the proposed wording alterations to policy and text have been included in the revised report.

Publication Draft Comments

12.65 As set out in the Consultation Statement (SD.7⁴⁶¹), the following issues were raised during Publication Draft consultation:

- Persimmon Homes (PD4143) are concerned that no definition is given to what is considered to represent a significant tree, woodland or hedgerow;
- A resident (PD3254) supports the Policy NE3, which reflects National Guidance in the NPPF;
- Taylor Wimpey (PD3807) supports the revisions to Policy NE3 and the supporting text.

How Issues Have Been Taken into account prior to Submission

12.66 In response to the representation made by Persimmon Homes, the Council does not propose to make any modification to the policy. This is because the Plan Glossary already defines the term significant tree, that the policy provides detail in relation to woodland and to Tree Preservation Orders (TPOs), refers to the importance of 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 acknowledges the support from Taylor Wimpey and the local resident.

Duty to Cooperate (SD11)

12.67 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy.

Sustainability Appraisal (2017)

12.68 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
Green	Blue	Green	Blue	Blue	Green	Blue	Green	Green	Blue	Green	Green	Blue	Green	Green

12.69 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.70 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

⁴⁶¹ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	+	~	~	+	~	+	+	~	+	+	~	+	+

12.71 The SA made the following recommendation for changes to be made to the Publication Draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
The term "significant trees" should be defined, either within Policy NE3 or supporting text.	This has been defined in the supporting Glossary.

Justified

12.72 Woodlands, hedgerows and trees are usually associated with areas of high quality landscape character, Green Infrastructure and greenspace. Green Infrastructure studies have shown that Urban Core street greenery and wooded urban environments have positive impacts to land value and average house prices. Trees and green environments also help to absorb carbon dioxide, reduce wind speeds, reduce storm water run-off, absorb fine particles and provide urban cooling. Sunderland’s areas of high landscape character are often associated with well-wooded environments, such as the River Wear corridor west of the A19, or urban areas such as Ashbrooke, to the south of the city centre.

12.73 Policy NE3 is consistent with NPPF Paragraph 118 which identifies broad criteria to mitigate development impacts and harm to biodiversity, in particular where development would result in the loss or deterioration of irreplaceable habitats including ancient woodland and aged or veteran trees. Policy NE3 seeks to retain and conserve woodlands, hedgerows and trees, making reference to ancient woodland and veteran trees and provides detailed criteria against which to determine planning applications and their impacts and harm on such assets.

12.74 The policy has been influenced by Woodland Trust and local area guidance, and refined by the Council (in consultation with neighbouring authorities).

Reasonable Alternatives

12.75 In response to the representation made by Persimmon Homes, the Council does not propose to make any modification to the policy. This is because the Plan Glossary already defines the term significant tree, that the policy provides detail in relation to woodland and to Tree Preservation Orders (TPOs), refers to the importance of 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.

Effective

Deliverable

12.76 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. The forthcoming Biodiversity and Geodiversity SPD will provide clarity regarding information required to support planning decisions whilst also providing detailed guidance in relation towards suitable mitigation in relation to development proposals. Where feasible and appropriate, S106 funding will be sought to support scheme delivery.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE3	Woodlands/hedgerows and trees	Aims to retain and conserve woodlands, hedgerows and trees	<ul style="list-style-type: none"> Loss or reduction in area or quality of woodland, veteran trees, hedgerows, and trees of landscape value Reduction in the number of Tree Preservation Orders and hedgerows covered by the Hedgerow Regulations 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Plan/Policy Review objectives of the policy, in partnership with key stakeholders Identify potential measures to address issues Implement a programme of measures, and monitor and review progress 	<ul style="list-style-type: none"> Change in area and quality of Ancient Semi-natural Woodland, other locally native broadleaf woodland and hedgerows as a result of planning approval Change in number, quality and status of veteran/ancient trees and trees of landscape/amenity value as a result of planning approval Number of Tree Preservation Orders and hedges negatively affected as a result of planning approvals 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Woodland Trust Natural England ERIC NE

Consistent with National Policy

12.77 Policy NE3 is consistent with NPPF Paragraph 118 which identifies broad criteria to mitigate development impacts and harm to biodiversity, in particular where development would result in the loss or deterioration of irreplaceable habitats including ancient woodland and aged or veteran trees. Policy NE3 seeks to retain and conserve woodlands, hedgerows and trees, making reference to ancient woodland and veteran trees and provides detailed criteria against which to determine planning applications and their impacts and harm on such assets.

NE4 Greenspace

12.78 This policy seeks to protect, conserve and enhance the quality, community value, function and accessibility of greenspace across the city.

NE4 Greenspace

The council will protect, conserve and enhance the quality, community value, function and accessibility of greenspace and wider green infrastructure, especially in areas of deficiency identified in the Council's Greenspace Audit and Report by:

1. designating greenspaces in the A&D Plan;
2. requiring development to contribute towards the provision of new and/or enhanced greenspace where there is an evidenced requirement;
3. requiring all major residential development to provide:
 - i. a minimum of 0.9ha per 1000 bedspaces of amenity greenspace on site, unless
 - ii. a financial contribution for the maintenance/upgrading to neighbouring existing greenspace is considered to be more appropriate;
4. refusing development on greenspaces which would have an adverse effect on its amenity, recreational or nature conservation value unless it can be demonstrated that:
 - i. the proposal is accompanied by an assessment that clearly demonstrates that the provision is surplus to requirements; or
 - ii. a replacement facility which is at least equivalent in terms of usefulness, attractiveness, quality and accessibility, and where of an appropriate quantity, to existing and future users is provided by the developer on another site agreed with the council prior to development commencing; or
 - iii. replacement on another site is neither practicable or possible an agreed contribution is made by the developer to the council for new provision or the improvement of existing greenspace or outdoor sport and recreation facilities and its maintenance within an appropriate distance from the site or within the site.

The impact of development on greenspace provision will need to be considered on a case-by-case basis in terms of its potential impact on Natura 2000 (N2K) sites.

Positively Prepared

Vision and Strategic Priorities

12.79 The policy will assist the delivery of the spatial vision by supporting access to useable open space, leisure and recreation. It will also support a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all.

12.80 Policy NE4 will help to deliver Strategic Priorities 2, 3 and 8.

Draft Plan Comments

12.81 As set out in the Consultation Statement (SD.7⁴⁶²), the following issues were raised during the draft Plan consultation:

- Residents are concerned in regards to the loss of open space. A resident also requested that the policy was re-worded in regard to SANGS.
- CPRE consider the policy to be confusing in regards to the relationship with Green Infrastructure.
- Although the University of Sunderland support the policy, they object to criterion 5. Some developers object to criterion 3 as it's not in accordance with the NPPF whereas other developers object to criterion 4.
- Developers including Hellens and Taylor Wimpey have requested policy revisions and raise issues relating to the viability of contributions.

⁴⁶² [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

How Issues Have Been Taken into Account at Publication Draft

- The Plan seeks to protect and enhance greenspace (open space). The policies in the plan will ensure that greenspaces which of a high value are protected from development, however the Council has taken a flexible approach which will enable sites of low value to be considered as potential housing sites. The council has an up-to-date Greenspace Report (SD.47⁴⁶³) which justifies which sites are considered to be high value and retained. The Allocations and Designations Plan will designate these sites, the SHLAA (SD.22⁴⁶⁴) includes greenspaces which are considered to be surplus to requirement.
- Regarding resident's concerns regarding the loss of specific open spaces, these sites are not identified in the Plan and are a matter of individual planning applications. With regards to the reference to SANGS, the policy and text has been reconsidered, and SANGS is now included in the Glossary.
- In response to developer's comments alternative wording has been included and a further point has been simplified and now relates to major development. Viability considerations are dealt with in policy ID2.
- In light of the CPRE's concerns, the Green Infrastructure and Greenspace policies have been reviewed and updated. Further clarity in approach can be gleaned from the Green Infrastructure Strategy (SD.46⁴⁶⁵) and Greenspace Audit and Report (SD.47⁴⁶⁶).

Publication Draft Comments

12.82 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- The Environment Agency (PD213) supports the policy and suggests that the policy also references bluespace in title/text to promote and strengthen the requirement and provision of bluespace;
- Miller Homes (PD894) support policy NE4 and the supporting evidence base;
- A resident (PD3255) supports Policy NE4, which reflects National Guidance in the NPPF;
- Hellens Land (PD5082), Taylor Wimpey (PD3807) Persimmon Homes (PD4149) and the Burdon Lane Consortium (PD2699) set out issues regarding Paragraph 10.25, stating it should 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;
- In addition, Persimmon Homes (PD4119), Burdon Lane Consortium (PD2699) and Story Homes (PD5367) consider that the bedspace figures used in Paragraph 10.26 are too high and that average occupancy rates should be used;
- Barratt David Wilson Homes (PD1628) are concerned that Part 3 Criterion 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;
- Siglion (PD3033) state that 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;

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⁴⁶⁴ [https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_\(2018\).pdf?m=636802945571600000](https://www.sunderland.gov.uk/media/20860/SD-22-Strategic-Housing-Land-Availability-Assessment-2018-pdf/SD.22_Strategic_Housing_Land_Availability_Assessment_(2018).pdf?m=636802945571600000)

⁴⁶⁵ [https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_\(2018\).pdf?m=636802959791130000](https://www.sunderland.gov.uk/media/20889/SD-46-Sunderland-Green-Infrastructure-Strategy-2018-pdf/SD.46_Sunderland_Green_Infrastructure_Strategy_(2018).pdf?m=636802959791130000)

⁴⁶⁶

- CPRE North East (PD1195) states there is no consideration in this policy or 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.

How Issues Have Been Taken into account prior to Submission

- 12.83 In response to the Environment Agency representation, the Council does not propose to make any policy modification, because the emphasis of the policy focuses on greenspace, whilst still informed by the principles of green and blue infrastructure. This matter has been accepted by both parties in a Statement of Common Ground (SD.8k). The Council acknowledges support from Miller Homes and the local resident.
- 12.84 In response to representations made by Hellens Land, Taylor Wimpey, Persimmon Homes, the Burdon Lane Consortium and Story Homes, the Council does not feel it necessary to make any modification to this policy. 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. The Council also considers that the approach in Policy NE4 and paragraph 10.26 is realistic, and that 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.
- 12.85 In response to representations made by Barratt David Wilson Homes (PD1628), Taylor Wimpey (PD3820), Persimmon Homes (PD4149), Burdon Lane Consortium (PD2699) and Story Homes (PD5367) the Council acknowledges that the table within paragraph 10.26 be revised to show that three bedroom dwellings equate to 4 bedspaces, which is set out in the Schedule of Modifications (M61).
- 12.86 In response to the representation made by Barratt David Wilson Homes regarding the high level of greenspace that would be required within potential housing sites, the Council disagrees with this conclusion and contends that a far lower percentage of housing sites would be given over to greenspace.
- 12.87 In response to representations made by Siglion, the Council does not feel it necessary to make any modification to this policy. This is because 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.
- 12.88 In response to representations made to CPRE North East, no policy modifications are proposed. 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.

Proposed Modifications to the Publication Draft

12.86 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
10.26	Three bedroom dwelling – 5 4 bedspaces	To address representations submitted by Barratt David Wilson Homes (PD1628), Taylor Wimpey (PD3820), Persimmon (PD4149), and Story Homes (PD5367).

Duty to Cooperate (SD11)

12.89 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy.

Sustainability Appraisal (2017)

12.90 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.91 The SA made no recommendations for changes to be made to the draft Plan:

Sustainability Appraisal (2018) (SD5)

12.92 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	+	~	++	++	+	+	+	+	+	++	~	+	+

12.93 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

12.94 The Greenspace Audit and Report (SD47) provides an evidence base and framework for greenspace throughout the plan's implementation. The NPPF recognises the wider role of greenspace, stating that successful neighbourhoods require high quality public space, which in turn makes a vital contribution to the health and well-being of communities. It puts forward that the planning system should create a built environment that facilitates social interaction and inclusive communities and ensures access to open spaces and recreational facilities.

12.95 The NPPF also states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreational facilities and opportunities for new provision. Greenspace assessments should identify specific needs and quantitative or qualitative deficits of surpluses of open space, sports and recreational facilities in the local area (NPPF, Paragraphs 73 and 74). The Council's Greenspace Audit and Report (SD.47) follows this approach closely. It sets out in detail the existing provision (by all greenspace types) and where shortfalls exist, which inform the most appropriate

options to follow in the policy. As per the NPPF, the Council considers 'major development' to constitute 10 or more houses for the purposes of the policy.

12.96 Sunderland's greenspace is defined as follows:

- a) Amenity greenspace
- b) Provision for children and young people (fixed play equipment)
- c) Natural and semi-natural greenspace
- d) Formal parks and country parks
- e) Allotments and community gardens
- f) Outdoor sports facilities
- g) School playing fields and grounds
- h) Cemeteries and church grounds
- i) Civic spaces
- j) Coast and estuary.

12.97 In addition, further analysis has been undertaken to ascertain the quantity, quality, local value and site accessibility of greenspaces. This has been interpreted as follows:

- Quantity – the amount (by type) of greenspace available;
- Quality – based on detailed survey results, and existing known data;
- Value – capturing how important greenspace is to people; and
- Accessibility – how accessible each type of greenspace is available across the city, and also identifying known key physical barriers to access such as rivers, major roads and railways.

12.98 To ensure sufficient greenspace is provided for future residents, the Council will designate land in the Allocations and Designations Plan.

12.99 The Council considers that the policy (as proposed) allows for necessary flexibility in terms of its 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 Greenspace Audit and Report (SD.47) and is not considered to be appropriate detail within the Plan. These proposed alterations are therefore not supported by the Council.

12.100 The Council would note that at present there are no identified Local Green Spaces across the city, and the city has no history of such sites. The Greenspace Audit and Report (SD.47) provides a community value weighting to hundreds of sites across the city, which is explained more fully in Chapters 5 and 17. The level of weighting attached corresponds to the level of importance given to key criteria – for example, a 100 point weighting is attached to sites that contain European and nationally protected wildlife sites, whereas a 50 point weighting is attached to Local Wildlife Sites. 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. It is also considered that Local Green Spaces are not necessarily strategic in nature, and could therefore be further considered via the Allocations & Designations Plan.

Reasonable Alternatives

- 12.101 Regarding the Environment Agency's comments, 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 (SD.47) 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 Policy NE4, and with the amendments to Policy NE1 to incorporate blue infrastructure, the proposed change to the policy is not supported. The Council has signed a Statement of Common Ground with the Environment Agency (SD.8k) which indicates that they are happy with the approach.
- 12.102 Numerous developers proposed that SUDS and road verges should be included within the greenspace calculations on site. However, 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 overall calculation is also not considered to be onerous, which is discussed further, below.
- 12.103 Developers have proposed that the policy should follow household occupancy rates per dwelling (as used by County Durham). Furthermore, Barratt David Wilson Homes object to the policy as they have concerns that part 3 Criterion 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 Council disagrees with this conclusion and contends that a far lower percentage of housing sites would be given over to greenspace using Sunderland's proposed approach. 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.
 - 0.9 hectares / 1000 bedspaces = 0.9 hectares of greenspace – equates to 8% of the site to provide greenspace.
- 12.104 By contrast, using County Durham's 2018 Open Space Needs Assessment (OSNA) standards⁴⁶⁷ (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's OSNA applies 3.89 hectares per 1000 population = 2.21 hectares of greenspace required – equates to 20% of the site to provide greenspace.

⁴⁶⁷ "Durham County Council Open Space Needs Assessment 2018".
<http://durhamcc-consult.limehouse.co.uk/portal/planning/cdpev/>

12.105 In conclusion, the Council considers that the approach is realistic and provides considerably less greenspace than that suggested by Barratt David Wilson Homes. 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 – as the example above shows, the County Durham methodology requires significantly more greenspace to be provided on site than the Sunderland methodology. Sunderland’s methodology has been applied successfully for over 20 years and it is therefore considered that no changes are required to this approach.

12.106 Developers have also stated that the bedspace number is too high in Paragraph 10.26. The Council has carried this ‘bedspace’ approach forward from the 1998 UDP- it has worked well in Sunderland for 20 years and is therefore proposed for retention. However, the UDP identifies that 3 bed dwellings should equate to 4 bedspaces (and not 5 bedspaces as indicated in the Publication Draft Plan), and therefore the Council proposes a minor modification to reflect this (M61).

Effective Deliverable

12.107 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. Greenspaces will be identified via the Allocations and Designations Plan, and these will be informed by the Greenspace Audit and Report (SD47). Where feasible and appropriate, S106 funding will be sought to support scheme delivery.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE4	Greenspace	Aims to protect, enhance and manage the quality and quantity of the city’s greenspace and set standards for greenspace provision within new development	<ul style="list-style-type: none"> • Significant number of applications approved contrary to policy • Significant loss of existing greenspace to development • Significant reduction in quality of greenspace • Reduction in greenspace managed 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Plan/Policy • Review objectives if the policy in partnership with Council biodiversity and key stakeholders • Identify potential 	<ul style="list-style-type: none"> • Planning applications for development that are approved contrary to Greenspace Audit • Number of greenspaces provided • Net gain/loss of greenspace • Number of Suitable Alternative Natural Greenspaces (SANGS) created • Developer contribution payments received through 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • Natural England • Woodland Trust • Sport England • Greenspace Audit • Planning obligations monitoring

			to Green Flag standards	activities / interventions to address issues	planning obligations towards Greenspace or outdoor sport and recreation facilities <ul style="list-style-type: none"> • Area (ha) of new amenity greenspace created within major development schemes 	
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Consistent with National Policy

12.108 Policy NE4 is consistent with Section 11 of the NPPF which seeks to conserve and enhance natural environments. More specifically, Policy NE4 complies with NPPF Paragraph 73 which states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision, and that assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Paragraph 74 states that, overall, existing greenspaces should not be built on, but also sets out circumstances when development on greenspace may be acceptable. Paragraphs 99 and 114 also seek to conserve and enhance biodiversity and green infrastructure.

NE5 Burial Space

12.109 This policy relates to the future provision of burial space in the city.

NE5 Burial Space

The council will protect all existing burial spaces and seek to re-use existing spaces for new burial spaces where appropriate. In determining any application for the provision of new burial spaces, applications should demonstrate the following:

1. the provision meets the burial requirements of the various ethnic and religious groups within the city;
2. the spaces are located within close proximity to the communities served by spaces to reduce the travelling distance to visit the deceased; and
3. any effect on the water table and the possibility of flooding or water logging caused by the new provision is minimised.

Positively Prepared

Vision and Strategic Priorities

12.110 The policy will assist the delivery of the spatial vision by supporting easy access to useable open space.

12.111 Policy NE5 will help to deliver Strategic Priority 8.

Draft Plan Comments

12.112 As set out in the Consultation Statement (SD.7⁴⁶⁸), the following issues were raised during the draft Plan consultation:

- The policy was supported by Historic England and CPRE.

⁴⁶⁸ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=63680735162640000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=63680735162640000)

How Issues Have Been Taken into Account at Publication Draft

12.113 No issues raised.

Publication Draft Comments

12.114 As set out in the Consultation Statement (SD07), no key issues were raised against Policy NE5.

How Issues Have Been Taken into account prior to Submission

12.115 As set out in the Consultation Statement (SD07), no key issues were raised against Policy NE5.

Duty to Cooperate (SD11)

12.116 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

12.117 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.118 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.119 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	~	+	++	+	+	+	~	+	~	~	+

12.120 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

12.121 The Policy is supported by the city's Greenspace Audit and Report (SD.47) which provides details on available burial space, together with an annual estimate per annum of municipal graves purchased. This enables accurate estimates to be made of the municipal grave capacity available across the 10 municipal cemeteries in the city. The report confirms that the Council has sufficient grave capacity throughout the Plan period. However, in spatial terms, there is no municipal burial space remaining in Washington, and there has already been some initial site investigation regarding a new municipal cemetery to serve Washington. It would also appear that Ryhope Cemetery could become full within the next 11 years - therefore consideration could be given to formalising use of the Ryhope Cemetery expansion area. If a new site is desired this will be further considered in the A&D Plan.

12.122 Cemetery expansion areas will continue to be saved in the UDP until further consideration is given to them through the A&D Plan.

Reasonable Alternatives

12.123 No reasonable alternatives.

Effective

Deliverable

12.124 If a new site is needed, this can be further considered (and allocated if necessary) in the Allocations and Designations Plan.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE5	Burial Space	Aims to protect and re-use the city’s burial spaces and provide new spaces where appropriate	<ul style="list-style-type: none"> • Significant drop in number of cemetery plots available within the city or within key areas • Identified requirement for new burial space for specific ethnic / religious group within the city 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Plan/Policy • Identify potential activities / interventions to address issues 	<ul style="list-style-type: none"> • Net gain/loss of burial spaces 	<ul style="list-style-type: none"> • SCC monitoring data • Annual citywide burial space stocktake.

Consistent with National Policy

12.125 Policy NE5 is consistent with Section 11 of the NPPF which seeks to conserve and enhance the natural and local environments. Burial spaces are a type of green space that is often located within natural and local environments. More specifically, Policy NE5 provides a framework for use in the determination of development proposals which complies with NPPF Paragraphs 121 and 122, and Paragraph 70 which identifies that planning policies should plan positively for the provision of shared and community facilities and resist their loss.

NE6 Green Belt

12.126 This policy seeks to define the city’s Green Belt and its purpose, and to protect the Green Belt from inappropriate development.

NE6 Green Belt

1. The Green Belt (as designated on the Policies Map) in Sunderland will serve the following purposes:
 - i. check the unrestricted sprawl of the built up areas of the city;
 - ii. assist in safeguarding the city’s countryside from further encroachment;
 - iii. assist in the regeneration of the urban area of the city;
 - iv. preserve the setting and special character of Springwell Village and Newbottle Village; and
 - v. prevent the merging of Sunderland with Tyneside, Washington, Houghton-le-Spring and Seaham, and the merging of Shiney Row with Washington, Chester-le-Street and Bournmoor.
3. In assessing development proposals, development that is inappropriate in the Green Belt will not be approved except in very special circumstances.

4. 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.
5. Proposals in the Green Belt for increased opportunities for access to the Open Countryside and which provide opportunities for beneficial use such as outdoor sport and recreation, appropriate to the Green Belt, will be encouraged where it will not harm the objectives of the Green Belt and recognise the important role of the Green Belt as a biodiversity resource.

Positively Prepared

Vision and Strategic Priorities

12.127 The policy will assist the delivery of the spatial vision by supporting a high quality natural environment. It will also support a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife. The policy will support urban regeneration, and therefore support opportunities for residents to live in sustainable communities accommodating all ages and abilities.

12.128 Policy NE6 will help to deliver Strategic Priorities 2, 3 and 8.

Draft Plan Comments

12.129 As set out in the Consultation Statement (SD.7⁴⁶⁹), the following issues were raised during the draft Plan consultation:

- Residents objected to the loss of Green Belt. A resident was also concerned of the loss of Green Belt at the IAMP and the impact on wildlife.
- Esh and New Herrington Working Club requested the policy be amended to be consistent with the NPPF.
- CPRE support the policy
- Other sites for deletion from the Green Belt were promoted through this policy including SHLAA site 401.
- Town End Farm Partnership supports the deletion of Green Belt north of Nissan.
- Siglion would request the policy makes reference to brownfield land.

How Issues Have Been Taken into Account at Publication Draft

- The IAMP AAP removed land from the Green Belt to facilitate the delivery of the IAMP and sets out the policy framework for the site.
- The Council has identified sites throughout the city to accommodate approximately 90% of housing needs within the existing urban area, however there remains a shortfall. Prior to considering the Green Belt, the Council undertook a Strategic Land Review and reviewed its employment land, greenspace, Settlement Breaks and open countryside to identify potential housing sites. Nevertheless, a shortfall remains and the only remaining sustainable and viable option left is to release parts of the Green Belt. The 3 stage Green Belt Review (accompanied by a Green Belt Boundary Review and Exceptional Circumstances Paper) (SD31, SD33, SD34) has identified 11 Housing Growth Areas in the Green Belt which will deliver sufficient sites for the Plan Period. The sites within Washington and Sunderland North also help to provide more of a balance of housing options across the city, which otherwise would be dominated by sites in the Coalfield and South Sunderland.
- In response to the developers comments, all alternative wording has been included in the revised policy, except for proposed reference to "South" Tyneside, which is not supported because this reference refers to Gateshead as well.

⁴⁶⁹ [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

- SHLAA Site 401 was considered at all 3 Green Belt Review stages (SD.29, SD.30, SD.31) and it was concluded that the site should be included as safeguarded land as part of a wider identified site.
- The Council does not consider it necessary to include brownfield land in the policy as this is included in the NPPF.

Publication Draft Comments

12.130 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Ei Group (PD837) would like to see Copt Hill Public House removed from Green Belt and considered as a housing allocation;
- Siglion (PD2865) state that 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 other relevant policies;
- Historic England (PD112) welcomes 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 Framework for Policy HG11;
- Mineral Products Association (PD4417) state 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;
- A landowner, Mr. Gregson (PD312), sets out that Policy NE6 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;
- Hellens Land (PD5100) generally support the policy, but suggested that their land interest to the east of A19 at Middle Herrington should be removed from the Green Belt as the site represents an anomaly and makes no contribution to Green Belt purpose;
- CPRE North East (PD1203) supports 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;
- Wynyard Homes (PD4705) supports Policy NE6 which is consistent with the NPPF, but questions the need to release land from the Green Belt, when appropriate non-Green Belt sites are available, such as land at Quarry House Lane, East Rainton;
- Taylor Wimpey (PD3838) supports the policy and welcomes the revisions to Policy NE6 and the supporting text which aligns with the requested changes submitted as part of their responses to the Draft Plan, and Policy E11 (as it was then referenced);
- Landowners, Ms. Taylor and Ms. McClelland (PD4369), state that 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, including a site they put forward in Settlement Break at Houghton-le-Spring;
- A landowner, Mr. Hutchinson (PD2053), agrees that there are exceptional circumstances to amend the Green Belt but disagrees with the exclusion of Glebe House Farm as an HGA site;
- Springwell Village Residents Association (PD5081) set out that 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;

- A landowner, Mr. Ford (PD180), considers that Parcel 1 of the Settlement Break should be deleted as it does not form any of the functions of the Settlement Break nor does it contribute towards the GI network. It is considered that the Settlement Break Report (SD.48) is not robust and Mr. Ford has put forward a site for development in Settlement Break to the north of Hetton Bogs;
- A significant number of number of residents/members of the general public objected to the policy and the removal of sites HGA1, HGA2, HGA3, HGA4 and HGA7 on the following grounds:
 - The removal of HGA sites from the Green Belt is not justified or consistent with national policy;
 - Removal of HGA sites from the Green Belt would result in sprawl, loss of countryside, merging of settlements and would discourage development on brownfield sites;
 - The policy and HGA sites do not take account or address the 5 purposes of Green Belt and the exceptional circumstances do not justify their release as alternative non-Green Belt sites are available;
 - Brownfield and empty homes should be used before Green Belt land;
 - The evidence base to demonstrate the exceptional circumstances for Green Belt release or justify the boundary changes is not reliable;
 - The removal of a policy from the Plan which sought to “preserve the setting and special character of Springwell Village”;
 - Merges Springwell Village and Washington which is contrary to the purposes of Green Belt; and
 - The maps within the Plan are incorrect as they show the site not currently within Green Belt boundaries;
- Developer, Mr. Delaney (PD34), objected to the words 'may be permitted' in criterion 3 and proposed that it be changed to 'will be permitted' to provide certainty.

How Issues Have Been Taken into account prior to Submission

12.131 In response to the various comments relating to proposals to take sites out of the Green Belt by landowners and developers, the Council does not feel it necessary to make any modifications and does not support the sites put forward. The Council has set out its spatial approach/justification to housing land supply and set out its approach towards allocating sites and safeguarding sites via 3 separate Green Belt Review papers, an Exceptional Circumstances Paper and a Green Belt Boundary Assessment (SD29-34).

12.132 In response to the various comments relating to proposals to take sites out of Settlement Breaks by landowners and developers, the Council does not feel it necessary to make any modifications and does not support the sites put forward. The Council has undertaken a Settlement Review (SD.48) and only sites which are considered fundamental have been retained within the Settlement Breaks.

12.133 In response to representations made by Siglion, the Council does not feel it necessary to make any modifications because 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.

12.134 In response to representations made by the Mineral Products Association, the Council does not feel it necessary to make any modifications because it is not considered necessary to repeat the NPPF.

- 12.135 In response to the representations raised by Mr. Delaney (PD34), the Council has proposed minor modifications as set out in the Schedule of Modifications (M62).
- 12.136 In response to representations made by CPRE the Council has worked closely with neighbouring 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 Council formally wrote to all neighbouring authorities to ask if they could accommodate any of Sunderland's growth without Green Belt incursion. They all responded to say they were unable to do so. Further details are included in the Duty to Cooperate Statement (SD.11).
- 12.137 In response to representations made by Springwell Village Residents Association and various other local residents the Council has taken into consideration the representations and is not proposing to make any modifications to this policy. The Council has set out its spatial approach/justification to housing land supply and this includes prioritising the development of brownfield land when preparing the Plan, and considering the viability of a range of site typologies through the Viability Assessment (SD.60). Further details are provided in the 3 Green Belt Review papers, the Exceptional Circumstances Report and the Green Belt Boundary Assessment (SD.29-34).

Proposed Modifications to the Publication Draft

12.138 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
NE6.3	Development in the Green Belt may <u>will</u> be permitted where the proposals are consistent with the exception list in national policy subject to all other criteria being acceptable.	To address representations made by Ray Delaney (PD34).

Duty to Cooperate (SD11)

- 12.139 In general terms, Sunderland's Green Belt forms part of the wider Tyne and Wear Green Belt area, therefore the purpose of the policy is consistent (and cooperative) with the approaches of the other 4 Tyne and Wear authorities.
- 12.140 Meetings have taken place between Gateshead Council and Sunderland Council. Although Gateshead Council has maintained its concern that proposed Housing Growth Areas around Springwell Village and North Washington may narrow the strategic gap provided by the Green Belt between Washington and Gateshead, in terms of Policy NE6 there is agreement that the remaining Green Belt boundaries (proposed for retention) provide strong and durable boundaries that should be protected in full.
- 12.141 Comments received from both South Tyneside Council and Durham County Council raise no objection to Sunderland's approach in relation to this policy.

Sustainability Appraisal (2017)

12.142 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.143 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.144 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	-	-	~	~	+	+	++	~	~	~	~	~	~	+

12.145 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

12.146 The Government attaches great importance to Green Belts, and this is outlined in the NPPF. Sunderland's Green Belt policy closely adheres to the NPPF, retaining Green Belt openness and permanence (Paragraph 79) and recognising that 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan' (Paragraph 83).

12.147 Policy NE6 is supported by five reports, which have been prepared to review and make recommendations to the Green Belt within Sunderland, where appropriate. These are:

- 2017 Green Belt Assessment Stage 1 Updated and Stage 2 (SD.29 and SD.30);
- 2017 Stage 3 Green Belt Site Selection Report (SD.31);
- 2018 Green Belt Boundary Assessment and Recommendations (SD.34);
- 2018 Exceptional Circumstances for Releasing Land from the Green Belt (SD.33); and
- 2018 Green Belt Addendum (SD.32).

12.148 In terms of Part 1 of the policy, Sunderland's Green Belt follows the 5 identified purposes, with minor changes made to reflect local need. These purposes follow NPPF Paragraph 80 and were endorsed through the adopted UDP. Plan Policy NE6 now proposes two changes to the UDP interpretation, which are as follows:

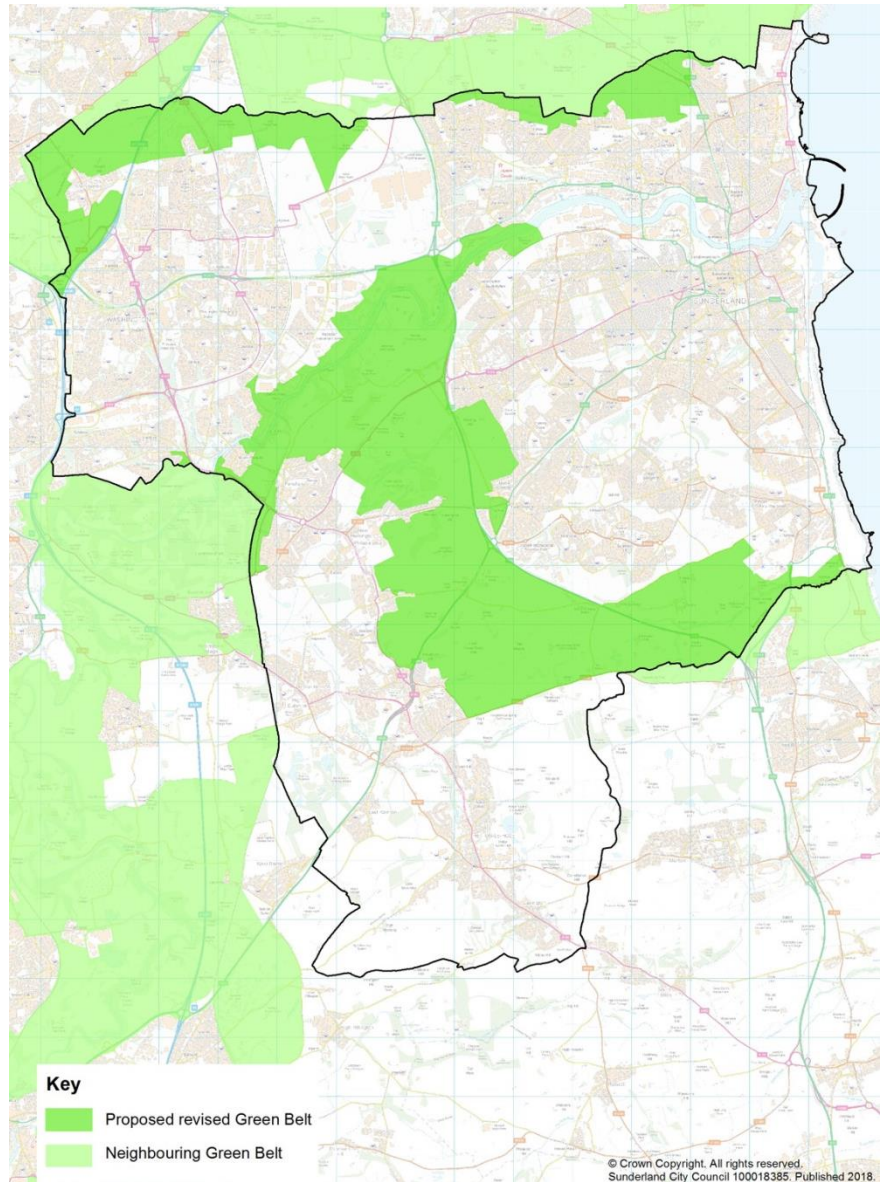
- Purpose (i): the definition of the 'built-up area' was set out in the 1985 Tyne and Wear Green Belt Local Plan, and within Sunderland this area includes Sunderland, Washington, Springwell Village and the linear built-up area stretching from Penshaw southwards to Houghton-le-Spring and Hetton-le-Hole. The existing urban area outlined in the Plan closely matches this boundary and is used in this instance to define purpose (i) above. For clarity, the reference to 'Sunderland' will be replaced with 'the city', because 'Sunderland' can sometimes be considered to represent only the urban area east of the A19, whereas the built-up area should be considered for the entire city area.
- Purpose (iv) was introduced to the Tyne and Wear Green Belt upon the introduction of PPG2 in 1995, following advice received from the Department of the Environment at the time. No specific guidance regarding interpretation of this purpose was received, and

the Council puts forward the reference to Springwell Village for this purpose as a major modification to the Draft UDP, (duly adopted in 1998). Given the precedent this has set, it is accepted that Springwell Village remains identified in this purpose. Furthermore, given the history and Conservation Area status of Newbottle village, this village is also included within this purpose.

12.149 Further detail relating to Sunderland’s 5 Green Belt purposes is set out at Paragraph 3.8 (Page 11) of the Stage 1 Updated and Stage 2 Report (SD.30).

12.150 Sunderland’s Green Belt boundary has been reviewed in line with NPPF Paragraph 85, and identifies a robust and durable new boundary. The Green Belt Boundary Assessment (SD.34) provides the city’s revised Green Belt boundary (page 65).

12.151 Parts 2, 3 and 4 of Policy NE6 (relating to very special circumstances, together with appropriate and inappropriate Green Belt development) conform to Paragraphs 87-91 in the NPPF. The Council agrees with the proposal to amend Criterion 3 from 'may be permitted' to 'will be permitted' as a modification to the policy (M62).



Reasonable Alternatives

12.152 In response to the CPRE’s request for a collective strategic review of the Tyne and Wear Green Belt, the Council confirms that it has worked closely with neighbouring 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 (as per the NPPF), 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 considered to be

Figure 53 Green Belt boundaries in and around Sunderland

negligible in relation to the overall purposes of the Tyne and Wear (and County Durham) Green Belt.

- 12.153 In response to Historic England's comment relating to site HGA11, the Council has agreed a Statement of Common Ground with Historic England (SD.8k) and proposes an extended bullet point to Policy SS7 (The Coalfield Housing Growth Areas) (M29).
- 12.154 In response to the Minerals Products Association comment, the Council considers that it is not necessary for the Plan 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. Likewise, in relation to Siglion's comment, the Council considers that it would similarly repeat the NPPF, in this case replicating 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.
- 12.155 A number of sites have been put forward for Green Belt deletion and/or safeguarding by landowners and developers, and each of these have been specifically addressed in the Spatial Strategy section (earlier). They are as follows:
- Hellens Land - land interest to the east of A19 at Middle Herrington, Sunderland. This has been separately addressed in relation to Policies SS3 (Safeguarded Land) and Policy SP5 (South Sunderland)
 - The Ei Group – land at Copt Hill Public House, Houghton-le-Spring. This has been separately addressed in relation to Policy SS7 (The Coalfield Housing Growth Areas)
 - Landowner, Mr McCall - land at West Herrington. This has been separately addressed in relation to Policy SS7 (The Coalfield Housing Growth Areas)
 - Landowner, Mr Wild – land at Springwell Village/Wrekenton. This has been separately addressed in relation to Policy SS2 (Washington Housing Growth Areas)
 - Landowner, Mr Hutchinson - land at Glebe House Farm, Washington. This has been separately addressed in relation to Policies SS2 (Washington Housing Growth Areas) and SS3 (Safeguarded Land)
 - Landowner, Mr Gregson - land at Burdon Village (for safeguarding). 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).
- 12.156 The following sites have been put forward for development outside of the Green Belt and these have also been specifically addressed in the Spatial Strategy section (earlier). They are as follows:
- Wynyard Homes – land at Quarry House Lane, East Rainton. The Council notes the support to the policy and has set out its spatial approach/justification to housing land supply (see Policy SP.1 Spatial Strategy), as well as a specific response relating to the site (see Policy SP.6 The Coalfield)
 - Landowners, Ms Taylor and Ms McClelland – land at Hutton Close, Houghton-le-Spring. The Council notes the objection to the policy and has set out its spatial approach/justification to housing land supply (see Policy SP.1 Spatial Strategy), as well as a specific response relating to the site (see Policy SP.6 The Coalfield).
- 12.157 None of the above Green Belt and non-Green Belt sites are supported by the Council and considered to represent reasonable alternatives. A significant number of residents/members of the general public objected to the policy and the proposed removal of sites HGA1, HGA2, HGA3, HGA4 and HGA7 from the Green Belt. In response, 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; SP4 North Sunderland; SS4 North Sunderland Housing Growth Areas; and land for safeguarding (see Policy SS3 Safeguarded Land).

Effective

Deliverable

12.158 The Policy provides a clearly defined and revised Green Belt area and boundary. Any form of development proposed will be considered against the 5 purposes of Green Belt in Sunderland, and in line with national policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE6	Green Belt	Aims to protect the city's Green Belt against inappropriate development	<ul style="list-style-type: none"> Substantial deletion of land from the Green Belt Development permitted within the Green Belt contrary to Policy/consultation advice 	<ul style="list-style-type: none"> Identify reasons for Green Belt deletion and/or development Review strategic approach to identification of land for development Review Local Plan and Green Belt designation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Green Belt area additions and losses (ha) Appeals allowed for applications within the Green Belt 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

12.159 Policy NE6 complies with the policies identified in Chapter 9 of the NPPF. Policy NE6 identifies the purposes of Green Belt in accordance with NPPF Paragraphs 79 & 80; inappropriate development in the Green Belt will be allowed only in exceptional circumstances in accordance with NPPF Paragraph 87; and that development exceptions in the Green Belt will be allowed in accordance with NPPF Paragraphs 81, 89 and 90.

NE7 Settlement Breaks

12.160 This policy seeks to define the city's Settlement Breaks and their purpose, and to protect the Settlement Breaks from inappropriate development.

NE7 Settlement Breaks

1. Settlement Breaks (as designated on the Policies Map) will serve the following purposes:
 - i. prevent the merging of settlements;
 - ii. assist in the regeneration of the urban area of the city; and

- iii. maintain the Green Infrastructure Network.
- 2. Within Settlement Breaks, planning permission will not be granted for any form of development, including changes of use, unless:
 - i. it can be demonstrated that the development is not contrary or detrimental to the above functions and aims; or
 - ii. it is essential for the proposed development to be located within the Settlement Breaks, and the benefits of which override the potential impact on the Settlement Break.

Positively Prepared

Vision and Strategic Priorities

12.161 The policy will assist the delivery of the spatial vision by supporting a high quality natural environment. It will also support a network of green infrastructure, supporting and protecting our biodiversity and wildlife. The policy will support urban regeneration, and therefore support opportunities for residents to live in sustainable communities accommodating all ages and abilities.

12.162 Policy NE7 will help to deliver Strategic Priorities 2 and 8.

Draft Plan Comments

12.163 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- Residents raised concerns of the loss of Settlement Breaks and the merging of settlement particularly Ryhope and Tunstall.
- Developers requested the policy be amended to be in accordance with the NPPF. Persimmon supported the policy. Avant homes objected to the policy and promoted a site for removal at Tunstall Hills.

How Issues Have Been Taken into Account at Publication Draft

- Settlement Breaks have been protected in Sunderland since the 1960's and follow 3 key purposes: to keep communities physically distinct; to aid urban regeneration, and to retain green infrastructure corridors. The Settlement Break Review (SD.48) has enabled critical analysis to take place and to create a new strong and defensible Settlement Break boundary that will endure over the Plan period. Around 35% of the existing Settlement Break is to be removed as a result of this review, safeguarding the remaining land parcels and also including new land parcels to the Settlement Break area.
- No changes proposed in response to the developers comments, as any shortfalls in a 5-year supply would be subject to a Delivery Test in line with PPG/NPPF and would not be additionally referenced within this policy.
- The site at Tunstall Hills (put forward by Avant Homes) has been assessed through the SHLAA. The Settlement Break policy has been revisited in line with the results and conclusions drawn from a 2018 revision to the Settlement Break Review (SD.48). A revised Settlement Break boundary is included in the Plan and land within this will be protected by the policy. The land in question (SHLAA site 562) is included within the Settlement Break. The justification for this is contained in the Settlement Break Review (SD.48).

Publication Draft Comments

12.164 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- A landowner, Mr. Ford (PD180) considers that Parcel 1 of the Settlement Break should be deleted as it does not form any of the functions of the Settlement Break nor does it contribute towards the GI network. It is considered that the Settlement Break Report is not robust;

- Landowners, Ms. Taylor and Ms. McClelland (PD4398), 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;
- Story Homes (PD5432) is 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, Story Homes proposed additional text be added to ensure the Plan is positively prepared and effective;
- Persimmon Homes (PD4151) previously supported the review of Settlement Breaks as a means of identifying additional land supply. If the Council is to retain Settlement Breaks it is correct to review these, especially if Green Belt deletion is proposed. However, Persimmon 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. Persimmon supports the removal of area 4 from the High Dubmire/Dairy Lane/Houghton sub area and objects to the retention of area 5 of the Newbottle and Sedgeleth subarea. Overall Persimmon disagrees with recommendations of the Settlement Break Review;
- Wynyard Homes (PD4709) set out 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;
- Avant Homes (PD1503) states that the policy as it is not sufficiently flexible to enable sustainable sites to come forward during the Plan period and is not in line with national policy. Avant suggest that the proposed Settlement Break area should exclude the site put forward by them beside Tunstall Hills;
- Hellens (PD4674) set out that the 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 the Settlement Break policy endures the consultee requests that the boundaries are reviewed and based on logical boundaries. Hellens put forward a site at Broomhill to be excluded from Settlement Break;
- Residents (PD961 & PD1009) state that the revised boundaries of Settlement Breaks remove too much land, to the detriment of Settlement Break purposes.

How Issues Have Been Taken into account prior to Submission

12.165 In response to the various comments relating to proposals to take sites out of Settlement Breaks by landowners and developers, the Council does not feel it necessary to make any further modifications and does not support the sites put forward. The Council has undertaken a Settlement Break Review (SD.48) and only sites which are considered fundamental have been retained within the Settlement Breaks. The Council has set out its spatial approach/justification to housing land supply and set out its approach towards allocating sites and safeguarding sites within the Green Belt via 3 separate Green Belt Review papers, an Exceptional Circumstances Paper and a Green Belt Boundary Assessment (SD29-34).

12.166 In response to the residents' comments, the Settlement Break Review (SD.48) 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.

Duty to Cooperate (SD11)

12.167 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy

Sustainability Appraisal (2017)

12.168 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.169 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.170 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	-	-	~	~	+	+	++	~	~	~	~	~	~	++

12.171 The SA made no recommendations for changes to be made to the Publication Draft plan.

Justified

12.172 Settlement Breaks have been protected in Sunderland since the 1960's and follow 3 key purposes: to keep communities physically distinct; to aid urban regeneration, and to retain Green Infrastructure corridors. The Settlement Break Review (SD.48) has enabled critical analysis to take place and to create a new strong and defensible Settlement Break boundary that will endure over the Plan period. Around 35% of the existing Settlement Break is to be removed as a result of this review, safeguarding the remaining land parcels and also including new land parcels to the Settlement Break area.

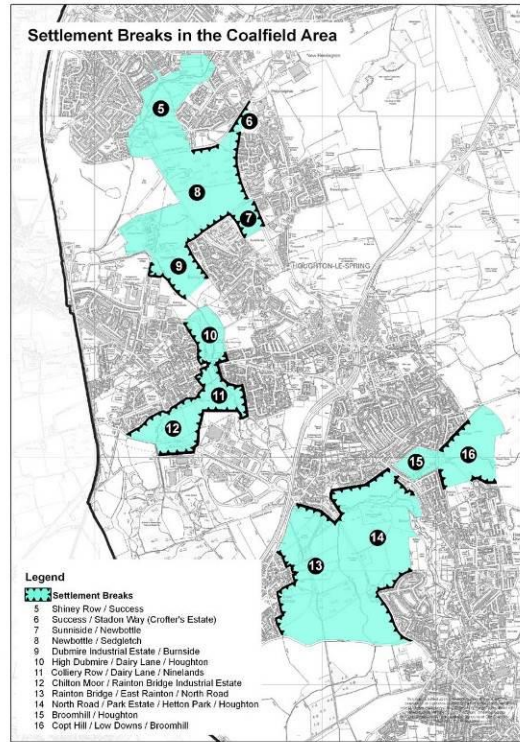
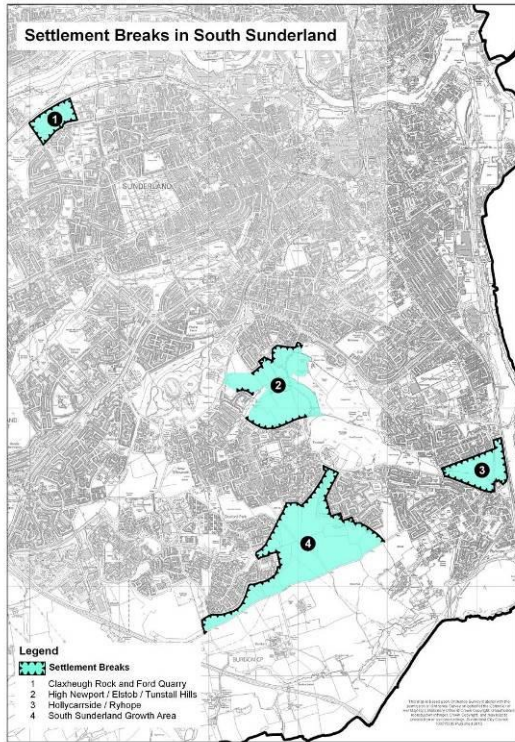


Figure 54 Existing Settlement Breaks

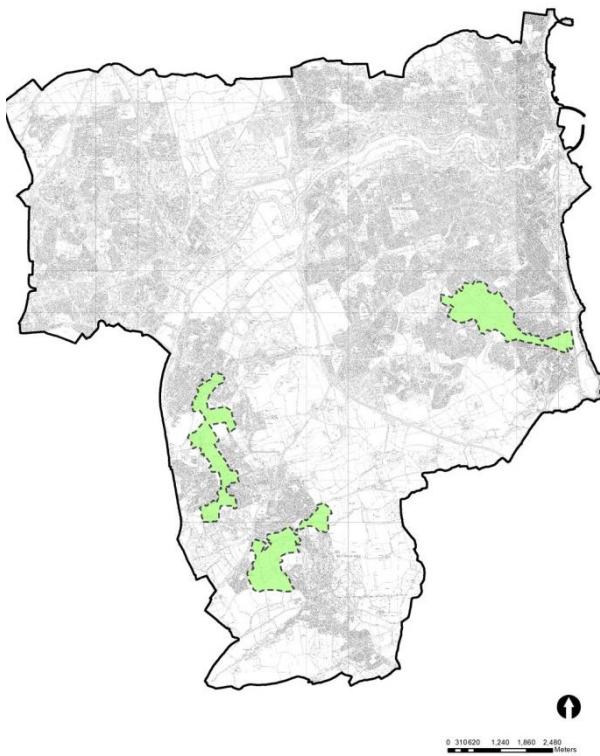


Figure 55 Proposed Settlement Breaks

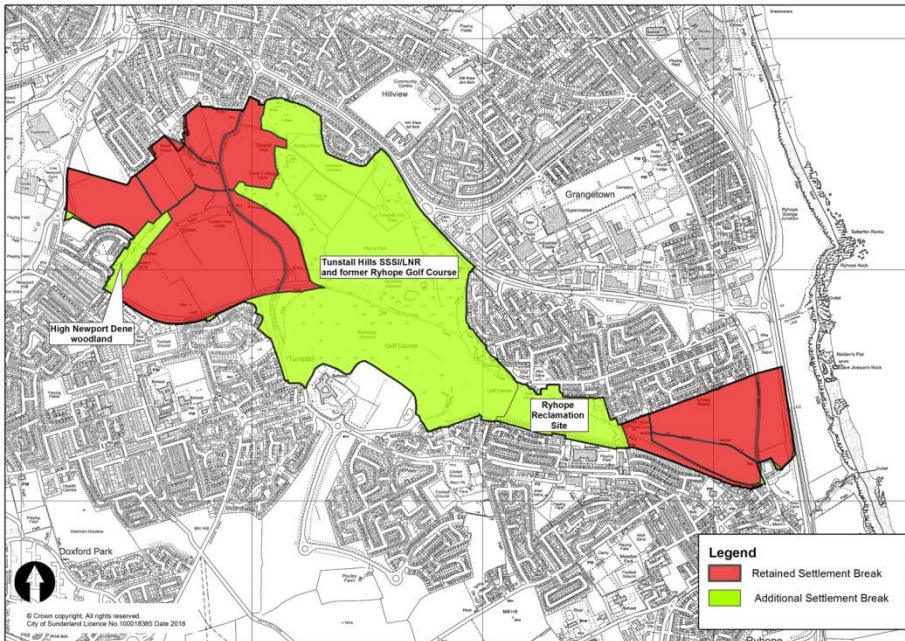


Figure 56 Additional Settlement Break land in South Sunderland

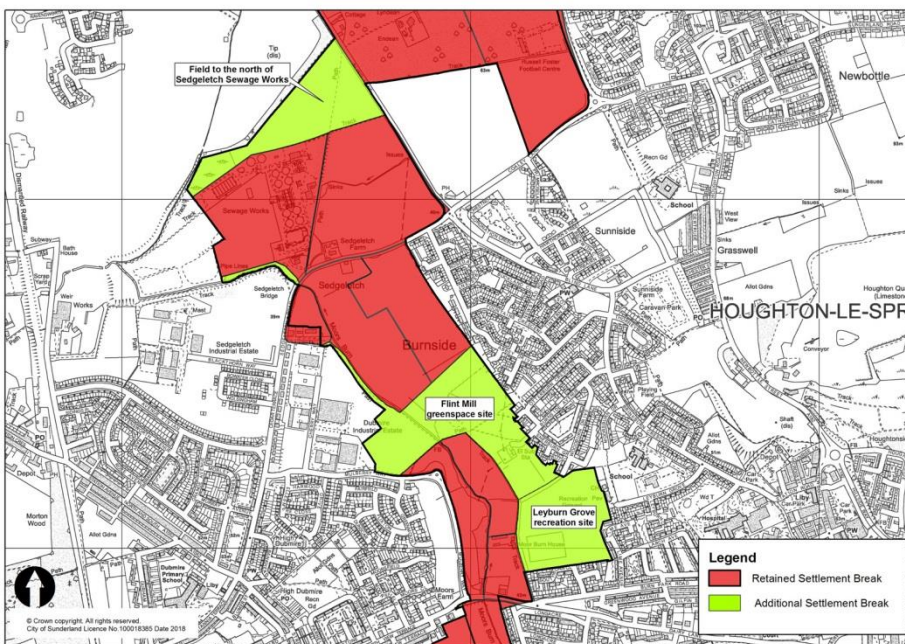


Figure 57 Additional Settlement Break land in The Coalfield

12.173 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.

12.174 The 2018 Settlement Break Review (SD.48) provides an up-to-date evidence base and framework for the retention of Settlement Break land throughout the plan's implementation.

It updates Settlement Break Reviews carried out in 2013, 2016 and 2017. The three purposes of Settlement Breaks (as outlined in the policy) are as follows:

- i. prevent the merging of settlements;
- ii. assist in the regeneration of the urban area of the city; and
- iii. maintain the Green Infrastructure Network.

12.175 They have been updated since they were set out in the 1998 UDP, and this is explained in paragraphs 1.3 and 1.4 (pages 2 and 3) of the 2018 Review. The revised Settlement Break boundary is identified in the 2018 Review (Map 3, page 10). In line with latest policy thinking, Settlement Breaks help to support green infrastructure corridor connectivity, climate change resilience, biodiversity and wildlife movement, and also seek to prevent the merging of settlements, focusing on built character and local identity.

12.176 The Settlement Break Review (2018) (SD48) assesses these land areas to consider whether they met the established Settlement Break purpose and should therefore be retained. The Review identifies a number of land parcels that could be released and brought forward for development. The remaining land is justified in the review for Settlement Break retention.

Reasonable Alternatives

12.177 A number of sites have been put forward for development within Settlement Breaks and these have been specifically addressed in the Spatial Strategy section (earlier). They are as follows:

- Persimmon Homes – land at Russell Foster Football Pitches (Coaley Lane, Newbottle). The Council sets out a specific response relating to the site - see Policy SP6 The Coalfield;
- Wynyard Homes – land at Quarry House Lane, East Rainton. 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 (see Policy SP6 The Coalfield);
- Landowners, Ms Taylor and Ms McClelland – land at Hutton Close, Houghton-le-Spring. 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 (see Policy SP6 The Coalfield);
- Avant Homes – land beside Tunstall Hills, Sunderland. The Council sets out a specific response relating to this site (see Policy SP5 South Sunderland);
- Hellens – land at Broomhill, Hetton-le-Hole. The Council sets out a specific response relating to this site (see Policy SP6 The Coalfield);
- Landowner, Mr C Ford – land beside Hetton Bogs, Hetton-le-Hole. The Council sets out a specific response relating to this site (see Policy SP6 The Coalfield).

12.178 The Council considers that no reasonable alternatives exist. Settlement Breaks represent a long standing policy of open countryside around some of our built-up areas- they have worked well to help focus development in urban areas and support the retention of the city's Green Infrastructure corridors. Public consultation has demonstrated support for Settlement Break retention by local residents and by countryside groups. Without the Settlement Break policy in place, pressure for Settlement Break release for development would have increased further, potentially merging settlements, impacting on sensitive environmental areas and creating development in less sustainable locations.

Effective Deliverable

12.179 The Policy provides a clearly defined and revised Settlement Break area and boundary. Any form of development proposed will be considered in line with the policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE7	Settlement Breaks	Aims to protect the city's Settlement Breaks against inappropriate development	<ul style="list-style-type: none"> Substantial deletion of land from designated Settlement Breaks Development permitted within the Settlement Break contrary to Policy/consultation advice 	<ul style="list-style-type: none"> Identify reasons for Settlement Break deletion and/or development Review strategic approach to identification of land for development Review Local Plan and Settlement Break designation Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Settlement Break area additions and losses (ha) Appeals allowed for applications within Settlement Break areas 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

12.180 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.

NE8 Development in the Open Countryside

12.181 This policy seeks to define and to protect the city's Open Countryside, and to support limited development that can boost the rural economy and assist in rural diversification.

NE8 Development in the Open Countryside

The Open Countryside (as designated on the Policies Map) will be protected and access enhanced. Limited development can help to sustain existing businesses, boost the rural economy and assist in rural diversification. The council will support:

1. development for agriculture, horticultural and forestry buildings; outdoor sport; outdoor recreation; cemeteries and rural business, provided that it can demonstrate that:
 - i. there is a clear need;
 - ii. the scale, nature, design, materials and siting of the development is compatible with the existing development and in close proximity to it;

- iii. it will not result in a scale of activity that has a detrimental impact on the surrounding area; and
- iv. there are no existing on-site buildings suitable for the proposed use;
- 2. development for a new dwelling for agricultural, horticultural or forestry workers provided it can be demonstrated that there is a clear need;
- 3. housing development if rural exceptions in national policy can be met;
- 4. an isolated single dwelling if it is of exceptional quality and incorporates innovative design features and reflects the highest standards in architecture and sustainability;
- 5. development that is required to ensure the conservation and, where appropriate, enhancement of assets of historical significance;
- 6. the replacement of a building, where the development would not have a significantly greater impact on the rural environment than the original building it is proposed to replace, provided the new building:
 - i. would be in the same use;
 - ii. is not materially larger than the one it replaces; and
 - iii. is sited on or close to the position of the existing building;
- 7. extensions or alteration of a building provided that:
 - i. it would not result in disproportionate additions over and above the size of the original building;
 - ii. it would not adversely affect the form and character of existing buildings and are designed to reflect and complement them; and
 - iii. with regards residential, the creation of a residential curtilage will not have a harmful impact on the character of the countryside;
- 8. limited infilling in villages or hamlets, subject to criteria 1ii and 1iii above being met; and
- 9. the redevelopment of previously developed land, provided that the site is not of high environmental value or landscape quality, and if the development will contribute to local housing needs or provide new jobs.

Positively Prepared

Vision and Strategic Priorities

12.182 The policy will assist the delivery of the spatial vision by supporting a high quality natural environment. It will also support a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife. The policy will support urban regeneration, and therefore support opportunities for residents to live in sustainable communities accommodating all ages and abilities.

12.183 Policy NE8 will help to deliver Strategic Priorities 2, 3 and 8.

Draft Plan Comments

12.184 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- CPRE comment that the policy for developments in Open Countryside is too relaxed in prohibiting development.
- Developers including Hellens and Taylor Wimpey requested the policy be amended to be consistent with the NPPF.

How Issues Have Been Taken into Account at Publication Draft

12.185 In response to the CPRE comment, the Council considers that the policy provides strong protection to the Open Countryside. The opening to this policy has been reworded and now states that the Open Countryside (as designated on the Policies Map, SD.2) will be protected. The exceptions to this (listed) follow NPPF policy.

12.186 Regarding developers comments, the Council has considered the comments and does not consider it necessary to modify this Policy. Any shortfalls in a 5-year supply would be subject to a Delivery Test in line with PPG/NPPF and would not be additionally referenced within this policy.

Publication Draft Comments

12.187 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- Karbon Homes (PD3389) supports Policy NE8 and the 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. Karbon Homes considers it would be more appropriate to have a separate policy for rural exception sites;
- Taylor Wimpey (PD3854) and Hellens Land (PD5119) object to the policy because it could preclude development on sites which are sustainable. Taylor Wimpey propose that once a five year land requirement cannot be demonstrated that sustainable sites within Open Countryside be considered for development and this should be stated in the policy/supporting text;
- Story Homes (PD5447) 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 and therefore object to the policy. National policy seeks a more flexible and positive approach;
- Persimmon Homes (PD4158) are concerned that the policy is overly restrictive and will potentially preclude the development of sustainable, edge of urban settlement sites;
- Harworth Estates (PD2094) 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";
- Developer Mr. Delaney (PD35), requested confirmation that the policy would not be applied in the Green Belt.

How Issues Have Been Taken into account prior to Submission

12.188 In response to representations made by Story Homes, Taylor Wimpey, Hellens Land, Harworth Estates and Persimmon Homes, the Council does not propose to make any modifications to this policy, or support any sites put forward within the identified area of Open Countryside. The Council has set out its spatial approach/justification to housing land supply (earlier) and is supported by the Strategic Land Review (SP.18), which demonstrates that all of these open countryside areas are remote and rural, with numerous physical and environmental constraints/features. 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. 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.

12.189 In response to the representation made by Karbon Homes, the Council does not feel it necessary to make any modifications to this policy. For the most part, Sunderland forms part of the Tyne and Wear urban conurbation, and few areas could be considered to be genuinely rural. Within the area of Open Countryside only minor hamlets exist, and these are isolated in nature. Neither could be considered sustainable development or justify a genuine need to provide affordable homes for families within these hamlets. 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.

12.190 In response to the representations made by Mr. Delaney, the Council can confirm that Policy NE8 applies to a specifically allocated area that is separate from the Green Belt.

Proposed Modifications to the Publication Draft

12.191 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
NE8.9	The redevelopment of previously developed land, provided that the site is not of high environmental value or landscape quality, and <u>if the development</u> will contribute to local housing needs or provide new jobs.	Typographical error
Figure 42	Replaced map, amended key (see Appendix 1)	For clarity

Duty to Cooperate (SD11)

12.192 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy.

Sustainability Appraisal (2017)

12.193 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.194 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.195 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	+	++	~	++	+	~	+	~	~	+	~	~	~	++

12.196 The SA made no recommendations for changes to be made to the Publication Draft plan.

Justified

12.197 In planning terms, this area of open farmland and greenspace surrounding Hetton-le-Hole has not been subject to an allocated planning policy and was termed “white land” in the UDP (therefore subject to UDP Policy EN10, whereby the existing pattern of land use was intended to remain, and proposals for development would need to be compatible with the principal use of the neighbourhood). By contrast, the remaining areas of countryside in the city were protected as Green Belt or as Settlement Break (or Green Wedges), and/or were also subject to UDP policies relating to the coast or to greenspace or protected wildlife sites.

12.198 Previous consideration of this land to be allocated as Green Belt had been dismissed as it was felt that the land had only limited relevance to the purposes of Green Belt, particularly because there was no conceivable likelihood that Hetton and Houghton would merge with Sunderland. Shortly after the adoption of Sunderland's UDP in 1998, Green Belt in County Durham was approved, and although new Green Belt was allocated between Seaham and Sunderland, there was no such allocation to the west of Seaham and at Murton, which would have adjoined the open countryside to the east of Hetton-le-Hole. This area of open countryside is considered to be extensive and remote, with no prospect of any settlement merging in this area. Sunderland's Green Belt Boundary Assessment (SD.34) has subsequently concluded that no further boundary change is justified in this area (Green Belt Boundary Assessment and Recommendations, p38).

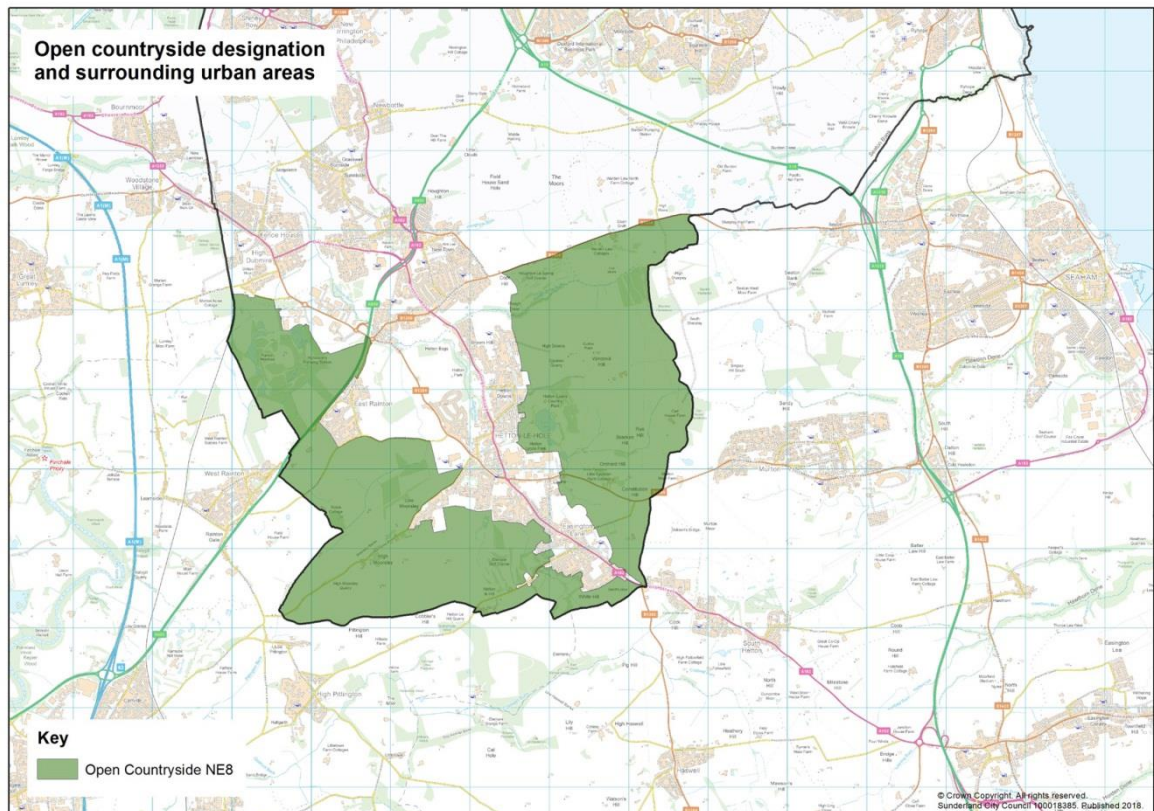


Figure 58 Open Countryside Designation and Surrounding Urban Areas

- 12.199 The area is also considered to be too open to be considered as a Settlement Break (or Green Wedge). Sunderland's Settlement Breaks are typically no more than 1 kilometre in width (and tend to represent urban fringe), whereas the Open Countryside area included in Policy NE8 is much broader to the west, south and east of Hetton-le-Hole.
- 12.200 The need to protect the city's Open Countryside has been considered carefully in relation to promoting sustainable patterns of development. Since 2015, the Council has been investigating in detail all development possibilities across the city, commencing with a Strategic Land Review (SLR) (SP.18-22). The SLR investigated all parcels of land that had been put forward in the SHLAA (SD.22) and all available employment land parcels, together with broader assessments of non-built-up areas (Green Belt, Settlement Break and Open Countryside). The SLR provided background constraint summaries that could be used to inform the updates to the SHLAA, Employment Land Review (SD.37), Settlement Break Review (SD.48) and Green Belt Reviews (SD.29-SD.34).

12.201 The Strategic Land Review (SP.18) concluded that Policy NE8 refers to areas of rural countryside that is distanced from local centres and local facilities, often incorporating areas of protected wildlife habitat, greenspace or areas of higher landscape value, and therefore unsustainable for larger land release. Overall, they represent the least sustainable development areas in the city. Nevertheless, and in accordance with the NPPF (particularly paragraphs 54, 55, 89 and 111) the policy contains exceptional circumstances that will support sustainable (but isolated) development in rural areas, to help sustain existing businesses and boost the rural economy. Further detail relating to Open Countryside is also provided in the Spatial Strategy section (earlier).

Reasonable Alternatives

12.202 In response to the representation made by Karbon Homes, the Council does not feel it necessary to make any modifications to this policy. For the most part, Sunderland forms part of the Tyne and Wear urban conurbation, and few areas could be considered to be genuinely rural. Within the area of Open Countryside only minor hamlets exist, and these are isolated in nature. Neither could be considered sustainable development or justify a genuine need to provide affordable homes for families within these hamlets. 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.

12.203 In response to representations made by Story Homes (PD5447), Taylor Wimpey (PD3854), Hellens Land (PD5119), Harworth Estates (PD2094) and Persimmon Homes (PD4158), the Council does not propose to make any modifications to this policy, or support any sites put forward within the identified area of Open Countryside. The Council has set out its spatial approach/justification to housing land supply (see Homes section, Policy SP8 and in relation to Paragraph 6.9 in the Plan) and is supported by the Strategic Land Review (SP.18), which demonstrates that all of these Open Countryside areas are remote and rural, with numerous physical and environmental constraints/features. 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. 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.

12.204 In relation to the site put forward by Harworth Estates (land beside Rainton Meadows, Houghton-le-Spring), the Council has set out a specific response (see Spatial Strategy section, Policy SP6 The Coalfield).

Effective Deliverable

12.205 The policy will be delivered through the submission and determination of planning applications.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE8	Development in the open countryside	Sets out the circumstances when development within the	<ul style="list-style-type: none"> Substantial areas of safeguarded land lost to inappropriate 	<ul style="list-style-type: none"> Identify reasons for open countryside 	<ul style="list-style-type: none"> Open countryside area additions and losses 	<ul style="list-style-type: none"> SCC monitoring data Planning applicatio

		open countryside will be permitted	<ul style="list-style-type: none"> • Development permitted within the Open Countryside contrary to Policy/consultation advice 	development <ul style="list-style-type: none"> • Review strategic approach to identification of land for development • Review Local Plan and extent of land designated as open countryside • Potential review of the Plan/Policy 	(ha) <ul style="list-style-type: none"> • Appeals allowed on land designated as open countryside • Dwellings approved and built under the NPPF's Rural Exceptions Policy 	ns
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Consistent with National Policy

12.206 Policy NE8 seeks to deliver a high quality natural environment and provide access to useable open space, leisure and recreation opportunities through protection of the Open Countryside. This accords with policies identified in Chapter 11 of the NPPF. Furthermore, Policy NE8 identifies exceptions where isolated dwelling(s), replacement dwellings, dwellings for agricultural/forestry/horticultural workers, limited infilling, replacement dwellings and use of previously developed land are acceptable in the Open Countryside, to accord with NPPF Paragraphs 54, 55, 89 and 111.

NE9 Landscape Character

12.207 The policy seeks to protect, conserve and enhance the city's varied landscape (and seascape) character, recognising the intrinsic character and beauty of the countryside as a core planning principle.

NE9 Landscape Character

1. To protect, conserve and enhance the varied landscape character (including seascape development) proposals should:
 - i. demonstrate a high quality of landscape design, implementation and management as an integral part of the new development; and
 - ii. demonstrate how the following elements identified in the city's Landscape Character Assessment are taken into account:
 - a) the key characteristics, assets, sensitivities and vulnerabilities; and
 - b) measures to protect and/or enhance the landscape in the relevant locality.
2. Development that causes significant adverse impact on the distinctive landscape characteristics of an area will be not be supported unless the impacts are clearly and demonstrably outweighed by the benefits of the proposed development.

Positively Prepared

Vision and Strategic Priorities

12.208 The policy will assist the delivery of the spatial vision by supporting a high quality natural, built and historic environment and also support a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife.

12.209 Policy NE9 will help to deliver Strategic Priorities 2 and 8.

Draft Plan Comments

12.210 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- Developers suggested alternative working to be consistent with the NPPF.
- Historic England request reference to the Tyne and Wear Historic Landscape Characterisation Report in the text.

How Issues Have Been Taken into Account at Publication Draft

12.211 Developers' alternative wording has been broadly agreed and included in the revised policy.

12.212 Historic England's additional text has been included.

Publication Draft Comments

12.213 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Taylor Wimpey (PD3877) supports the revisions to Policy NE9 and the supporting text which aligns with the requested changes submitted as part of their responses to the Plan, and Policy E16 (as it was then referenced);
- Historic England (PD113) welcome the reference to the Historic Landscape Characterisation Report within this section within Paragraph 10.46;
- A resident (PD3256) supports Policy NE9, which reflects National Guidance in the NPPF.

How Issues Have Been Taken into account prior to Submission

12.214 The Council acknowledges the support set out above.

Duty to Cooperate (SD11)

12.215 Liaison took place throughout 2015 with neighbouring authorities and with the cross-boundary Limestone Landscapes Partnership to ensure that a 'best-fit' approach to assessing landscape character was found. The Sunderland Landscape Character Assessment (SP.47) was able in particular to build on work already undertaken by Durham County Council which had examined landscape character areas and typologies in a sub-regional setting. The methodology undertaken also carefully reviewed the South Tyneside Landscape Character Study (2012), the Landscape Character Assessment for Gateshead Council (2007), the 2008 County Durham Landscape Character Assessment and the 2010 Limestone Landscapes Character Framework. This ensured that Sunderland Council was able to develop a characterisation which met the needs of the city, while ensuring an agreed cross-boundary approach with neighbour authorities.

Sustainability Appraisal (2017)

12.216 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.217 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.218 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	+	~	~	+	~	+	~	~	+	~	~	++	++

12.219 The SA made no recommendations for changes to be made to the Publication Draft plan.

Justified

12.220 National policy provides strong support towards protecting and enhancing valued landscapes. It recognises the intrinsic character and beauty of the countryside as a core planning principles.

12.221 The Council’s Landscape Character Assessment (SP.47) provides an up-to-date evidence base and framework for landscape and seascape enhancement and protection throughout the Plan’s implementation. The Council worked closely with neighbouring authorities to ensure that an agreed cross-boundary approach to landscape character was achieved. The approach to the study was led by good practice guidance on the topic published in 2014 by Natural England.

12.222 The study has identified variations in landscape character and describes these for all parts of Sunderland. The Landscape Character Assessment (SP.47) has defined eleven landscape character types, which are subdivided into a total of 30 character areas. The landscape character types share common characteristics which may inform broader management decisions. Character areas are geographically distinct examples of a type, which display these common characteristics but nevertheless have their own distinct identity and sense of place.

12.223 Development proposals will be assessed against the relevant landscape character types and areas- each of which offer guidance and strategy that proposes landscape protection or enhancement, or a combination of both.

Reasonable Alternatives

12.224 No reasonable alternatives.

Effective

Deliverable

12.225 The policy will be delivered through the submission and determination of planning applications. Applicants will be expected to submit a Landscape and Visual Impact Assessment to demonstrate that they have met the requirements of this policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or	Monitoring Indicator	Data Source
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Contingency						
NE9	Landscape character	Aims to protect and enhance the City's landscape character	<ul style="list-style-type: none"> • Significant number of proposed developments which conflict with or have an adverse effect on existing landscape characteristics 	<ul style="list-style-type: none"> • Identify reasons for increase in proposals for inappropriate development • Review strategic approach to identification of land for development • Review Local Plan and policy requirements for landscape of new developments • Potential review of the Plan/Policy 	<ul style="list-style-type: none"> • Planning applications approved which conflict with, or have an adverse effect on existing landscape character 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications

Consistent with National Policy

12.226 Policy NE9 seeks to protect and enhance the city's landscape character through criteria against which to assess development proposals. Policy NE9 complies with NPPF Paragraphs 109, 117, 118 and 170.

NE10 Heritage Coast

12.227 This policy seeks to conserve, protect and enhance the defined Heritage Coast within Sunderland.

NE10 Heritage Coast

1. The council and partners will seek to conserve, protect and enhance the natural and cultural integrity of the defined Heritage Coast, supporting the Magnesian Limestone landscape and seascape, biodiversity and quality of inshore waters, whilst accounting for the economic and social needs of adjacent coastal communities.
2. Development along or affecting the Heritage Coast will normally only be supported where it is aligned with all relevant key objectives within the adopted Heritage Coast Management Plan.

Positively Prepared

Vision and Strategic Priorities

12.228 The policy will assist the delivery of the spatial vision by supporting a high quality natural, built and historic environment, access to useable open space, leisure and recreation and

resilience to climate change. It will also support a network of Green Infrastructure, supporting and protecting our biodiversity and wildlife, whilst also improving access to greenspace for all.

12.229 Policy NE10 will help to deliver Strategic Priority 8.

Draft Plan Comments

12.230 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- Durham County Council states that the Plan should include a specific policy on the Heritage Coast (extending from Salterfen Rocks to County Durham), to ensure there is no direct or indirect adverse impacts on the Heritage Coast. There should also be reference to the impact of the SSGA on the Heritage Coast.
- Durham Heritage Coast Partnership state that the defined Heritage Coast is not recognised or acknowledged within the plan.

How Issues Have Been Taken into Account at Publication Draft

12.231 The above comments were noted and in liaison with Durham County Council and the Heritage Coast Partnership, a new specific policy for the Heritage Coast was added to the Plan.

Publication Draft Comments

12.232 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- Durham County Council (PD1396) welcomes Policy NE10 which is consistent with Durham County Council's previous representations which recommended that the Plan would benefit from a specific policy on the Heritage Coast;
- The Environment Agency (PD209 & PD210) supports the policy and suggests some minor amendments to incorporate estuary edge techniques to soften hard edges and create habitat to enhance coastal ecosystems where opportunities arise.

How Issues Have Been Taken into account prior to Submission

12.233 The Council and the EA (through a Statement of Common Ground, see SD.8k) agree that no changes are required to Policy NE10 relating to estuary edge techniques and supporting habitat and coastal ecosystems. The Council acknowledges the support from Durham County Council.

Duty to Cooperate (SD11)

12.234 During Draft Plan Consultation, Durham County Council stated that the Plan would benefit from a policy specifically on the Heritage Coast, to ensure that there were no direct or indirect unacceptable adverse impacts upon the Heritage Coast in Durham. Durham County Council's response on the Publication Draft Consultation acknowledges that the updated Plan now includes such a policy, and in addition, that planning permissions relating to the South Sunderland Growth Area (SSGA) have also satisfactorily addressed Heritage Coast issues. Durham County Council is therefore satisfied that the Plan appropriately addresses issues relating to the Heritage Coast. Both Councils are active members of the Heritage Coast Partnership.

12.235 The Environment Agency suggested minor amendments to the plan. These matters have been discussed with the Council and through a Statement of Common Ground (SD.8k) it has been agreed by both parties that no additional reference is required- ultimately the

designated Heritage Coast exists to the south of the River Wear Estuary and this detail would be better referenced at the Allocations & Designations Plan stage.

Sustainability Appraisal (2017)

12.236 Not applicable – no policy existed.

Sustainability Appraisal (2018) (SD5)

12.237 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	+	++	+	+	++	+	++	++	+	+	+	+	++	++

12.238 The SA made the following recommendation for changes to be made to the Publication Draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
The two criteria within this policy are inconsistent as whilst the first criterion takes account of local socio-economic need the second prohibits development unless it is "essential", a term which is not defined. A prohibition on nonessential development would also be misaligned with the key objectives of the adopted management plan for, and the status of, the Heritage Coast. To address this and provide an appropriate level of protection for the Heritage Coast, the policy should be revised to focus on compliance with the Management Plan key objectives. For example, the second criterion could be reworded to state: "Development along or affecting the Heritage Coast will normally only be supported where it is aligned with all relevant key objectives within the adopted Heritage Coast Management Plan".	Recommendation agreed and implemented.

Justified

12.239 The Heritage Coast is a designated area of coastline that extends south from South Sunderland into County Durham, and as far south as Hartlepool. The Coast has emerged from its industrial past to an area worthy of Heritage Coast status with one of the finest coastlines in England. The Heritage Coast Partnership oversees management of the coastline, seeking to protect the natural and cultural integrity of the area whilst developing and meeting the area's social and economic needs.



Figure 59 Heritage Coast – Sunderland, Durham & Hartlepool

12.240 The policy is compliant with NPPF Chapter 11 and more specifically Paragraph 114, which seeks to maintain the character of undeveloped coasts, protecting and enhancing their distinctive landscapes, and improving public access to and enjoyment of the coast. The Policy has specifically been developed in line with the Partnerships’ adopted Heritage Coast Management Plan (SP.49) and with the Council’s Landscape Character Assessment (SP.47). These documents provide an up-to-date evidence base and framework for landscape and seascape enhancement and protection throughout the plan’s implementation.

12.241 Development proposals will be assessed against the Heritage Coast Management Plan and Landscape Character Assessment.

Reasonable Alternatives

12.242 No reasonable alternatives.

Effective

Deliverable

12.243 The policy will be delivered through the submission and determination of planning applications, which will adhere to the Heritage Coast Management Plan (SP.49) and Landscape Character Assessment (SP.47).

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE10	Heritage Coast	Aims to protect and enhance the defined Heritage Coast	<ul style="list-style-type: none">Significant number of proposed developments which conflict with existing coastal characteristics	<ul style="list-style-type: none">Identify reasons for increase in proposals for inappropriate developmentReview strategic approach to identification of land for developmentPotential review of the Plan/Policy	<ul style="list-style-type: none">Appeals allowed for applications within area identified as Heritage Coast	<ul style="list-style-type: none">SCC monitoring dataPlanning applications

Consistent with National Policy

12.244 Policy NE10 seeks to conserve, protect and enhance the natural and cultural integrity of the defined Heritage Coast. The policy is compliant with NPPF Chapter 11, more specifically Paragraph 114, which seeks to maintain the character of undeveloped coasts, protecting and enhancing their distinctive landscapes, and improving public access to and enjoyment of the coast.

NE11 Creating and Protecting Views

12.245 This policy seeks to preserve or enhance key local views and vistas and to create new public views where possible.

NE11 Creating and Protecting Views

- All development should take account of views into, out of and within the development.
- Development should be designed to preserve or enhance key local views and vistas (as identified in the Council's Landscape Character Assessment), and create new public views where possible.
- Particular consideration should be given to views of significant buildings, including views to and from heritage assets, and views within landscapes which are more sensitive to change due to their open, exposed nature and extensive indivisibility from various viewpoints.

Positively Prepared

Vision and Strategic Priorities

12.246 The policy will assist the delivery of the spatial vision by supporting a high quality natural, built and historic environment and also support a network of green infrastructure.

12.247 Policy NE11 will help to deliver Strategic Priorities 2 and 8.

Draft Plan Comments

12.248 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- CPRE welcomes the policy as does Natural England.
- Developers suggest alternative wording to be consistent with the NPPF.

How Issues Have Been Taken into Account at Publication Draft

12.249 The developers' comments are noted, but it is considered that the proposed additional text is not required as the existing policy wording does not exclude sympathetic design.

Publication Draft Comments

12.250 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- The National Trust (PD4056) strongly supports reference to the long distance and panoramic views of [and from] Grade I listed Penshaw 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 Paragraph 10.48;
- A resident supports (PD3257) supports Policy NE11 as it reflect National Guidance and the NPPF;
- Taylor Wimpey (PD3878) supports the revisions to Policy NE11 and the supporting text which aligns with the requested changes submitted as part of our responses to the Plan, and Policy E15 (as it was then referenced);
- Springwell Village Residents Association (PD5091) state that the policy at 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.

How Issues Have Been Taken into account prior to Submission

12.251 The Council has taken into consideration the representations and is not proposing to make any modifications to this policy. In response to Springwell Village Residents Association, the Council considers that this comment 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).

12.252 In response to Taylor Wimpey, the National Trust, and the resident comment, the Council acknowledges the support.

Duty to Cooperate (SD11)

12.253 No duty to cooperate issues raised.

Sustainability Appraisal (2017)

12.254 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.255 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.256 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	+	~	~	+	~	+	~	~	+	~	~	++	++

12.257 The SA made no recommendations for changes to be made to the Publication Draft plan.

Justified

12.258 One of the key aspects and features that contribute to the quality of the city’s landscape and seascape character are viewpoints, especially important given the city’s prominent position along the North Sea coastline and River Wear Estuary, as well as accommodating the ridge of the Magnesian Limestone Escarpment running north-south through the city, and providing longer distance views inland towards the North Pennines. Key views are often associated with strategic natural landmarks (listed above) together with man-made landmarks in the city such as the Grade I listed Penshaw Monument, Northern Spire Bridge and Ryhope Pumping Station, as well as structures further afield including Durham Cathedral and Cleadon Water Tower. The Council’s UDP provided a number of specific policies that sought to protect key viewpoints across the city and these are considered to be strategic in nature and worthy of specific Plan policy.

12.259 The policy is compliant with NPPF Chapter 11 and more specifically with Paragraphs 81, 109, 114, and 170, which seek to maintain the character of the Green Belt, the natural and historic environment and undeveloped coastline. The 2015 Sunderland Landscape Character Assessment (SP.47) provides an up-to-date evidence base and framework for landscape and seascape enhancement and protection throughout the plan’s implementation. Development proposals will be assessed against the relevant landscape character types and areas- each of which (where relevant) identifies key local views and vistas to be retained. The Council will identify key local views and vistas through the Allocations and Designations Plan.

Reasonable Alternatives

12.260 Springwell Village Residents Association raised objections that Site HGA1 conflicts with Policy NE11 due to the impacts on Hauler House and railway line of Bowes Railway SAM. In response, 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).

12.261 National Trust state that Policy NE11 could be strengthened by recognising that more significant development proposals, such as 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. In response, 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 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 Plan, but further detail can be provided at the Allocations & Designations Plan stage.

Effective

Deliverable

12.262 The policy will be delivered through the submission and determination of planning applications. Applicants may be expected to submit a Landscape and Visual Impact Assessment to demonstrate that they have met the requirements of this policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE11	Creating and Protecting Views	Aims to protect and enhance key local views and vistas across the city	<ul style="list-style-type: none"> Significant number of proposed developments which have a detrimental impact on existing views and vistas, as outlined in the Landscape Character Assessment 	<ul style="list-style-type: none"> Identify reasons for increase in proposals for inappropriate development Review strategic approach to identification of land for development Review Local Plan and policy requirements for creating and protecting views Potential review of the Plan/Policy 	<ul style="list-style-type: none"> Appeals allowed for applications impacting key views and vistas as identified in Landscape Character Assessment 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Landscape Character Assessment

Consistent with National Policy

12.263 Policy NE11 seeks to create and protect existing views when assessing development proposals. This policy is compliant with NPPF Chapter 11 and specifically with regards to Paragraphs 81, 109, 114 and 170.

NE12 Agricultural Land

12.264 This policy seeks to ensure that use of better quality agricultural land for development is considered in the context of the agricultural land's contribution in terms of economic and other benefits.

NE12 Agricultural Land

Development which would result in the loss of best and most versatile agricultural land should be considered in the context of the agricultural land's contribution in terms of economic and other benefits.

Positively Prepared

Vision and Strategic Priorities

12.265 The policy will assist the delivery of the spatial vision by supporting a high quality natural, built and historic environment and supporting a more socially, economically and environmentally sustainable city.

12.266 Policy NE12 will help to deliver Strategic Priorities 2 and 8.

Draft Plan Comments

12.267 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation:

- Avant, Taylor Wimpey, Esh, Hellens and New Herrington Workmen's Club suggested that the policy wording was revised to be more consistent with the NPPF.

How Issues Have Been Taken into Account at Publication Draft

12.268 Alternative wording has been broadly agreed and included in the revised policy.

Publication Draft Comments

12.269 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation:

- CPRE North East (PD1221) supports the policy and 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;
- Taylor Wimpey (PD3892) supports the revisions to Policy NE12 and the supporting text which aligns with the requested changes submitted as part of our responses to the Plan, and Policy E16 (as it was then referenced);
- Natural England (PD2764) suggest the supporting text of Policy NE12 on Agricultural Land should make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land, in line with NPPF Paragraph 112.

How Issues Have Been Taken into account prior to Submission

12.270 The Council acknowledges the support of Taylor Wimpey. In response to the representations raised by Natural England, the two parties have agreed that such a reference would replicate NPPF policy, and have agreed that such reference is not required in the Plan text.

12.271 In response to the representations raised by CPRE, the Council considers that no modification is necessary to the policy because that the proposals put forward 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.

Duty to Cooperate (SD11)

12.272 No duty to cooperate issues raised.

Sustainability Appraisal (2017)

12.273 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

12.274 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

12.275 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	-	+	~	~	+	~	+	~	~	~	~	~	+	+

12.276 The SA made no recommendations for changes to be made to the Publication Draft plan.

Justified

12.277 Local authorities are required by national policy (NPPF paragraphs 112 and 143) to protect the best and most versatile agricultural land, and when considering applications for planning applications, the implications upon farming and quality of land is to be considered together with the environmental and economic implications. A statement detailing how the benefits would outweigh the loss of such land should accompany applications.

12.278 The Council relies on DEFRA 'Magic Maps' in relation to the city's agricultural land classification, however much of this land has not been classified to date. For major developments where land classification is not available, we may require the applicant to undertake work to determine land quality.

Reasonable Alternatives

12.279 Natural England requested that the supporting 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 agreed that such a reference would replicate NPPF policy, and have agreed that such reference is not required in the Plan text.

12.280 In response to the CPRE's proposal, the Council considers that the proposal is not in line with the NPPF which does not advocate safeguarding all Grade 2 agricultural land from development. In addition, there is no known evidence to justify the protection of lower

grade land lying on the Magnesian Limestone Plateau. These comments are therefore not supported.

Effective

Deliverable

12.281 The policy will be delivered through the submission and determination of planning applications. A statement detailing how the benefits would outweigh the loss of the best and most versatile agricultural land should accompany applications. For major developments where land classification is not available, we may require the applicant to undertake work to determine land quality.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
NE12	Agricultural Land	Sets out the circumstances when development on higher grade agricultural land may be permitted	<ul style="list-style-type: none"> • Significant number of proposed developments which are unsuitable for higher-grade agricultural land • Substantial loss of agricultural land to development • Overall reduction in quality of agricultural land 	<ul style="list-style-type: none"> • Identify reasons for increase in proposals for inappropriate development • Review strategic approach to identification of land for development • Review Local Plan and policy requirements for development on higher-grade agricultural land • Potential review of the Policy 	<ul style="list-style-type: none"> • Appeals allowed on allocated agricultural land 	<ul style="list-style-type: none"> • SCC monitoring data • Natural England – Agricultural Land Classification system

Consistent with National Policy

12.282 Policy NE12 resists the loss of best and most versatile agricultural land. This policy complies with NPPF Paragraphs 112 and 143.

13. Water, Waste and Energy

WWE1 Decentralised, Renewable and Low Carbon Energy

13.1 Implementing renewable, decentralised and low carbon energy is an important component to the response to the challenges of both climate change and security of energy supply. The purpose of the policy is to encourage the provision of renewable and low carbon energy through the planning system but also to recognise the role of setting the framework to allow assessment of potential impacts and to influence decision-making based on assessment.

WWE1 Decentralised, Renewable and Low Carbon Energy

1. The development of decentralised, renewable and low carbon energy will be supported subject to satisfactory resolution of all site specific constraints as follows:
 - i. decentralised, renewable and low-carbon energy development should be located and designed to avoid unacceptable significant adverse impacts on landscape, wildlife, heritage assets and amenity;
 - ii. appropriate steps should be taken to mitigate any unacceptable significant adverse impacts, such as noise nuisance, flood risk, shadow flicker, interference with telecommunications, air traffic operations, radar and air navigational installations through careful consideration of location, scale, design and other measures; and
 - iii. any adverse cumulative impacts of proposals.
2. Development that can provide combined heat and power must demonstrate that due consideration has been given to the provision of any heat produced as an energy source to any suitable adjacent potential heat customers.

Positively Prepared

Vision and Strategic Priorities

13.2 The policy will assist the delivery of the spatial vision by supporting climate change resilience, maximising opportunities for renewable energy and embraces sustainable design principles. Overall, it supports environmental sustainability and a high quality natural, built and historic environment.

13.3 Policy WWE1 will help to deliver Strategic Priorities 3 and 9.

Draft Plan Comments

13.4 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Historic England supports the policy.

How Issues Have Been Taken into Account at Publication Draft

- No issues identified

Publication Draft Comments

13.5 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- CPRE North East is concerned that the plan does not designate areas that are suitable for wind energy or make clear if no areas are considered suitable (PD1421).
- A resident objects to the policy as the location of the proposed Renewable Energy Centre Washington conflicts with the policy (PD8205).

How Issues Have Been Taken into account prior to Submission

13.6 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. With regards to the CPRE comment, the CSDP will be followed by an Allocations and Designations Plan (DPD) which will set suitable locations for wind energy development, where appropriate.

13.7 With regards to the resident comment, the policy sets an appropriate and justified approach to assessing decentralised, renewable and low carbon energy applications.

Duty to Cooperate (SD11)

13.8 No duty to cooperate issues raised.

Sustainability Appraisal (2017)

13.9 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied in include in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
?		?			?	?	?	?	?	?	?			

13.10 The SA made the following recommendation for changes to be made to the draft plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	In the next iteration of the emerging Sunderland CSDP, policy tests within policies CM2 and CM3 regarding the avoidance of adverse or unmitigated significant adverse impacts should be harmonised. To ensure the policies adequately protect environmental and amenity interests whilst not unnecessarily restricting decentralised, renewable and low carbon energy development, consideration should be given to amending the policy tests to instead require the avoidance of unacceptable significant adverse impacts.	Both policies now refer to the avoidance of "unacceptable significant adverse impacts".
SA12: Climate Change	To address identified inconsistencies, in the next iteration of the emerging Sunderland CSDP the policy tests within policies CM2 and CM3 regarding the avoidance of adverse or unmitigated significant adverse impacts should be harmonised. To ensure these policies adequately protect environmental and amenity interests whilst providing an appropriately supportive policy framework for decentralised, renewable and low carbon energy development in pursuit of this SA objective, consideration should be given to amending the policy tests to instead require the avoidance of unacceptable significant adverse impacts.	Both policies now refer to the avoidance of "unacceptable significant adverse impacts".

Sustainability Appraisal (2018) (SD5)

13.11 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	++	~	~	+	+	+	++	++	++	++	~	++	++

13.12 The SA made the following recommendation for changes to be made to the publication draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
Within Policy WWE1, criterion 1(i) and 1(ii) should be amended to require the avoidance of "unacceptable" significant adverse impacts, taking account of any proposed mitigation or compensatory measures and the predicted benefits of the proposal. These criteria should also make clear that mitigation should be proposed to avoid all likely significant adverse impacts wherever possible.	Criterion i and ii amended to say 'unacceptable' significant adverse impacts.
Criterion 1(iii) should be reworded to set out a clear policy test for cumulative impacts. This would align with the policy test(s) in criteria 1(i) and (ii).	No change proposed. Cumulative impacts are difficult to set a policy test for, as they will vary on a case by case basis.

Justified

- 13.13 The purpose of the policy is to encourage the provision of renewable and low carbon energy through the planning system in alignment with national planning policy. Furthermore, implementing renewable and low carbon energy is an important part of the response to the challenges of climate change.
- 13.14 The NPPF sets out the importance of transitioning to a low carbon future and encouraging appropriate renewable energy development. This features as a core planning principle⁴⁷⁰, illustrating the importance of low carbon adoption at a national level. In addition, the NPPF at paragraph 94, states that Local Planning Authorities should adopt a proactive strategy to mitigate and adapt to climate change and support the move to a low carbon future. The PPG⁴⁷¹ sets out that providing opportunities for renewable, low carbon and decentralised heating forms an important way that local plans can address the challenge of climate change.
- 13.15 The Sunderland Wind and Solar Landscape Sensitivity Assessment (2015) (SP.48) sets out evidence to support this policy. It considers the sensitivity of different landscape character areas to potential wind turbine and solar development within the city. The scope of this assessment was restricted to landscape and visual issues. It concluded that the majority of the city is of moderate or higher sensitivity to wind energy development particularly at larger scales. This is due to the small scale nature of landscapes in and around Sunderland and their high visibility and visual prominence from residential areas⁴⁷². When exploring solar developments, the study concludes that, there are few locations where large solar parks would not become visible features within the landscape. There is considered to be a moderate or lower sensitivity to medium solar parks (5-10 ha) across a number of landscape character areas⁴⁷³. Consequently, the development of most standalone renewable energy installations will require careful consideration due to their potential visual landscape, wildlife and amenity impacts, especially in areas of high landscape value. Taking this into account these issues, the policy has been drafted to include the following, at part 1, citations; 1, 2 and 3 are intended to check this potential impact. Citation 1 sets out the

⁴⁷⁰ See NPPF, paragraph 17, bullet point 6.

⁴⁷¹ See Paragraph - Paragraph: 003 Reference ID: 6-003-20140612

⁴⁷² [https://www.sunderland.gov.uk/media/20948/SP-48-Sunderland-Wind-and-Solar-Landscape-Sensitivity-Assessment-2015-/pdf/SP.48 Sunderland Wind and Solar Landscape Sensitivity Assessment \(2015\).pdf?m=636803799980470000](https://www.sunderland.gov.uk/media/20948/SP-48-Sunderland-Wind-and-Solar-Landscape-Sensitivity-Assessment-2015-/pdf/SP.48%20Sunderland%20Wind%20and%20Solar%20Landscape%20Sensitivity%20Assessment%20(2015).pdf?m=636803799980470000) page 66.

⁴⁷³ [https://www.sunderland.gov.uk/media/20948/SP-48-Sunderland-Wind-and-Solar-Landscape-Sensitivity-Assessment-2015-/pdf/SP.48 Sunderland Wind and Solar Landscape Sensitivity Assessment \(2015\).pdf?m=636803799980470000](https://www.sunderland.gov.uk/media/20948/SP-48-Sunderland-Wind-and-Solar-Landscape-Sensitivity-Assessment-2015-/pdf/SP.48%20Sunderland%20Wind%20and%20Solar%20Landscape%20Sensitivity%20Assessment%20(2015).pdf?m=636803799980470000) page 67.

need for proposals to be located and designed to avoid impacts. Citation 2, sets out the need for proposals to take appropriate steps to mitigate any unacceptable significant adverse impacts, such as noise, flood risk, shadow flicker, interference with telecommunication, air traffic operations, radar and air navigational installations. Citation 3, sets out the need to resolve any potential cumulative impacts which could be generated from the development. The policy is supported by the requirement of a landscape character assessment to assess the size, location and design of renewable energy schemes⁴⁷⁴. The policy and its associated background text ensures a balance between providing a positive framework for assessing developments and guarding against potentially harmful impacts

13.16 It is important that the benefits of decentralised, renewable and low carbon energy are felt locally. In this regard, part 2 sets out that proposals which can provide combined heat and power must demonstrate that due consideration has been given to provide energy to adjacent customers. This is considered appropriate to make sure those surrounding such development benefit from it.

Reasonable Alternatives

13.17 Not Include Policy on Decentralised, Renewable and Low Carbon Energy – Given the importance of renewable and low carbon forms of energy to reduce the impact of climate change the policy is considered necessary especially considering the importance of this within national planning policy.

Effective

Deliverable

13.18 The policy will be delivered through the determination of planning applications and delivery of other environmental and sustainable schemes that may be supported with funding. Applications for wind turbine installations will need to include details of associated infrastructure and connectivity, such as new access roads and overhead power lines, so that the Council can fully assess the proposal.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 1	Decentralised, Renewable and Low Carbon Energy	To encourage the provision of renewable and low carbon energy	<ul style="list-style-type: none"> No increase in delivery of renewable energy schemes to support development 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Explore opportunities to address issues, including funding opportunities Potential review of the 	<ul style="list-style-type: none"> Number of renewable energy installations Number of renewable energy schemes permitted/ Generation capacity of permitted/installed schemes. 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

⁴⁷⁴ Set out at CSDP paragraph 11.4.

Consistent with National Policy

13.19 Policy WWE1 supports new developments for decentralised, renewable and low carbon energy schemes and provides a framework for determining planning applications in accordance with paragraphs 95 and 96 of the NPPF. In compliance with paragraph 97 of the NPPF, the policy also ensures that adverse impacts of such developments will be mitigated.

WWE2 Flood Risk and Coastal Management

13.20 Flooding is a key factor in determining the scale and location of development. It is important that inappropriate development is avoided in areas currently at risk from flooding or likely to be at risk as a result of climate change, or in areas where development is likely to increase flooding elsewhere. Policy WWE2 sets out policy criteria on flood risk and coastal management.

WWE2 Flood Risk and Coastal Management

1. To reduce flood risk and ensure appropriate coastal management, development:
 - i. should follow the sequential approach to determining the suitability of land for development, directing new development to areas at the lowest risk of flooding and where necessary applying the exception test, as outlined in national planning policy;
 - ii. will be required to demonstrate, where necessary, through an appropriate Flood Risk Assessment (FRA) that development will not increase flood risk on site or elsewhere, and if possible reduce the risk of flooding;
 - iii. will be required to include or contribute to flood mitigation, compensation and/or protection measures, where necessary, to manage flood risk associated with or caused by the development;
 - iv. should comply with the Water Framework Directive by contributing to the Northumbria River Basin Management Plan;
 - v. will maintain linear coastal flood defences north from Hendon Sea Wall to Seaburn, and managed coastal retreat on the Heritage Coast and north of Seaburn;
 - vi. which would adversely affect the quantity of surface or groundwater flow or ability to abstract water must demonstrate that no significant adverse impact would occur, or mitigation can be put in place to minimise this impact; and
 - vii. of additional river flood defences must demonstrate that the proposal represents the most sustainable response to a particular threat.

Positively Prepared**Vision and Strategic Priorities**

13.21 The policy will assist the delivery of the spatial vision by supporting climate change resilience, embracing sustainable design principle and reducing the impact of flooding on homes and businesses.

13.22 Policy WWE2 will help to deliver Strategic Priorities 3, 8 and 9.

Draft Plan Comments

13.23 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Northumbrian Water supports the policy but requests further clarification. EA also supports the policy.
- Developers suggested alternative wording.

How Issues Have Been Taken into Account at Publication Draft

13.24 Changes have been made to Policies WWE2 and WWE3 to incorporate most of the changes suggested by the developers.

13.25 Support noted from Northumbrian Water and Environment Agency. The Plan has been amended to clarify when a flood risk assessment is necessary.

Publication Draft Comments

13.26 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Northumbrian Water support the policy (PD152).
- The Environment Agency supports but suggests a minor modification to make clear that development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain) would not be supported (PD215).
- Bellway Homes suggest that the policy should be amended to make clear that sites in higher flood risk areas can come forward subject to engineering solutions (PD1976).
- Taylor Wimpey and Hellens Land Ltd broadly support the policy but suggest that it could be amended to indicate that development can result in betterment for the site and surrounding area (PD3894 & PD5141)

How Issues Have Been Taken into account prior to Submission

13.27 The Council has not proposed any modifications, as a result of the comments above; however, modifications were made for clarity purposes. The policy is considered to be sound. With regard to the comment from the Environment Agency, the Council and Environment Agency have agreed through the signed Statement of Common Ground that no changes are required. With regard to Taylor Wimpey and Hellens Land comment, it is not considered necessary to set this detail out within the policy and background text.

13.28 In response to Bellway Homes, the CSDP sets out a justified approach to flood risk management. 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.

Proposed Modifications to the Publication Draft

13.29 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
11.11	Discussions should be held with the Lead Local Flood Authority (LLFA) when considering measures to mitigate flooding from different flood sources within development proposals.	For clarity
11.13	In determining the suitability of SuDS for individual development sites, developers should seek advice from the Lead Local Flood Authority LLFA.	For clarity
11.15	This policy should be read alongside <u>the Marine Policy statement and the Marine Management Organisation’s developing North East Inshore and Offshore Plans.</u>	To reflect the Statement of Common Ground with the Marine Management Organisation (SD.8k).

Duty to Cooperate (SD11)

13.30 The Environment Agency supports the policy but suggests a minor modification to make clear that development other than water compatible or essential infrastructure in Flood Zone 3b (Functional flood plain) would not be supported. As part of the Statement of Common Ground (SD.8k) between the Council and the Environment Agency both parties agreed that no changes are required to Policy WWE2 Flood Risk and Coastal Management

and its associated background text. Both parties agree that restricting development within flood risk zone 3B is inherent within existing policy and wording. This is demonstrated at: Part 1 of Policy WWE2, which sets out a sequential and exceptions test for applicable applications. Additionally, background text at CSDP paragraphs; 11.9 and 11.10 also set out the importance of resisting development in inappropriate areas.

- 13.31 As part of the Statement of Common Ground (SD.8k) between the Council and the Marine Management Organisation (MMO). The MMO considers that the Submitted Plan is considered to be sound and there are no strategic planning issues which have not been agreed upon. The Council and the MMO have agreed to continue to work together on strategic planning matters in Sunderland.

Sustainability Appraisal (2017)

- 13.32 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied in include in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
								?	?					

- 13.33 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA9: Water	There is considerable overlap and inconsistency in policy tests between policies CM4 – CM6, which impedes the effectiveness of these policies. In the next iteration of the emerging Sunderland CSDP, consideration should therefore be given to rationalising policies CM4 – CM6 into a single policy with clear assessment criteria that are themselves consistent with the NPPF.	3 policies have been retained but the overlap and inconsistency has been eliminated and is consistent with the NPPF. One policy relates to flood risk and coastal management; one relates to water management; and ne relates to water quality.
SA10: Flood Risk and Coastal Erosion (1)	To address identified uncertainties within policy CM4, in the next iteration of the emerging Sunderland CSDP the policy should be amended to clarify required surface run-off reductions.	Run-off rates are clarified in the equivalent policy which deals with water management.
SA10: Flood Risk and Coastal Erosion (2)	There is considerable overlap and inconsistency in policy tests between policies CM4 – CM6, which impedes the effectiveness of these policies. In the next iteration of the emerging Sunderland CSDP, consideration should therefore be given to rationalising policies CM4 – CM6 into a single policy with clear assessment criteria that are themselves consistent with the NPPF.	3 policies have been retained but the overlap and inconsistency has been eliminated and is consistent with the NPPF. One policy relates to flood risk and coastal management; one relates to water management; and one CM4 – Flood risk and relates to water quality.

Sustainability Appraisal (2018) (SD5)

- 13.34 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each

draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	-	~	~	+	~	+	++	++	~	+	~	~	~

13.35 The SA made the following recommendation for changes to be made to the publication draft.

13.36 Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
Criterion 1(viii) should be reworded for clarity and the word "severe" should be replaced.	The word 'severe' has been removed. This section relates to environmental rather than to capacity, and has also been moved to Policy WWE5 relating to the Disposal of Foul Water.

Justified

13.37 The City has a wide diversity of water assets and water resources. These include; the coast, the River Wear, and the River Don, Sunderland contains around 26.5km of inland designated main rivers and another 37km of Ordinary Watercourses. In addition to this, the City has considerable hydrological linkages with areas outside the administrative boundary. These assets increase the likelihood of flood risk and coastal change. Flooding is a key factor in determining the scale and location of development. It is important that inappropriate development is avoided in areas currently at risk from flooding, or likely to be at risk as a result of climate change, or in areas where development is likely to increase flooding elsewhere.

13.38 As required by the NPPF, the Council has undertaken a Strategic Flood Risk Assessment (SFRA) (SD.49)⁴⁷⁵ to set out a clear understanding of flood risk from all sources and investigate and identify the extent and severity of flood risk throughout the area. This sets out a number of recommendations which have been partially incorporated into the policy.

13.39 The policy sets out the following components:

- **Sequential and exceptions test** - the NPPF at paragraph 100, sets out the need to apply a sequential and exceptions test (paragraph 100). This need has been transposed into the CSDP at part 1, citation 1 of this policy.
- **Site specific flood risk assessment** - at part 1, citation ii, the policy sets out the importance of (where necessary) proposals providing a flood risk assessment. The need for this is set out in the NPPF at paragraph 102, which states that where appropriate, applications should be supported by a site-specific flood risk assessment. The SFRA (2018)⁴⁷⁶ sets out where a site specific flood risk assessment would be required (at recommendation 4) Citation ii states that flood risk assessments will be required to demonstrate that development will not increase flood risk on site or elsewhere, and if possible reduced the risk of flooding. This is also set out within national policy, within the NPPF at 163, which states when determining any planning applications, LPAs should

⁴⁷⁵ [https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-/pdf/SD.49_Sunderland_City_Council_Level_1_-_Strategic_Flood_Risk_Assessment_\(2018\).pdf?m=636802962946400000](https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-/pdf/SD.49_Sunderland_City_Council_Level_1_-_Strategic_Flood_Risk_Assessment_(2018).pdf?m=636802962946400000)

⁴⁷⁶

ensure that flood risk is not increased elsewhere. The policy via the flood risk assessment seeks to assess this.

- **Providing mitigation on areas at risk of flooding** - at part 1, citation iii, the policy sets out that where flood risk is associated or caused by development mitigation, compensation and or protection measures will be required. This is required in order to make sure flood risk is reduced. This is in alignment with NPPF, which states where new development is vulnerable (due to flood risk), care should be taken to ensure that risks can be managed through the planning of green infrastructure (paragraph 99).
- **Coastal defences** - in alignment with paragraph 106 of the NPPF, the policy, at part 1, citation v sets out the principle of maintaining the linear coastal flood defences north from Hendon Sea Wall to Seaburn, and managed coastal retreat on the Heritage Coast and north of Seaburn. The importance of coastal management is set out in the NPPF at paragraph 106 which states Local Planning Authorities should reduce risk from coastal change,
- **Protecting groundwater, surface water and abstract water** - in alignment with paragraph 143 of the NPPF, the policy has established criteria on the impacts on the flow and quantity of surface and groundwater. This is set out at part 1, citation vi which states that development which would adversely affect the quantity of surface or groundwater flow or ability to abstract water must demonstrate that no significant adverse impact would occur, or mitigation can be put in place.

13.40 The policy also sets out the importance of development complying with the Water Framework Directivities by contributing to the Northumbria River Basin Management Plan⁴⁷⁷ (at part 1, citation iv). The purpose of the Water Framework Directive sets out the importance of achieving qualitative and quantitative status of all water bodies. River Basin Management Plans (RBMPs) are a component of the Water Framework Directive setting out water resources and the water allocation plan. Drawn up by the Environment Agency, RBMPs aim to provide integrated management of surface and groundwater bodies across individual regions. Sunderland falls within the Northumbria River Basin Management Plan (RBMP) which provides cross-boundary guidance on good practice and measures for improvement.

Reasonable Alternatives

13.41 The Council consider there are no reasonable alternatives

Effective

Deliverable

13.42 The policy will be delivered through the determination of planning applications. Consultation will take place with Council Flood and Coastal Engineers on planning applications and as necessary with the Environment Agency.

13.43 Development should be directed towards locations which are at lowest risk from flooding. Where necessary, the applicant will be required to demonstrate that they have followed the sequential test.

13.44 Developers must consider flood risk from all sources as part of a SFRA and ensure they are utilising the most appropriate and up-to-date information in assessing the risk of flooding from all sources to the development site. Discussions should be held with the Lead Local

⁴⁷⁷ <https://www.gov.uk/government/publications/northumbria-river-basin-district-river-basin-management-plan>

Flood Authority when considering measures to mitigate flooding from different flood sources within development proposals. Conditions or planning obligations will be used as appropriate to secure flood risk mitigation measures.

- 13.45 Built development can lead to increased surface water run-off; therefore new development is encouraged to incorporate mitigation techniques in its design, such as source control (interception) Sustainable Drainage Systems (SuDS) and attenuation SuDS. In determining the suitability of SuDS for individual development sites, developers should seek advice from the Lead Local Flood Authority.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 2	Flood risk and coastal management	Aims to reduce flood risk, promote water efficiency measures and protect and enhance water quality	<ul style="list-style-type: none"> Any planning permissions granted contrary to NWL, LLFA, and EA advice Significant increase in instances of surface water flooding Significant number of new developments at risk from flooding indicated by the SFRA 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of properties identified as being at risk of potential flooding Applications granted contrary to NWL, LLFA and EA advice Number of flooding instances and events Planning applications approved in identified flood zones 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbrian Water Ltd Strategic Flood Risk Assessment (SFRA)

Consistent with National Policy

- 13.46 Policy WWE2 complies with section 10 of the NPPF which seeks to reduce flood risks and reduce risk from coastal change. More specifically policy WWE2 makes provision for development proposals to perform a sequential or exceptions test in accordance with NPPF paragraphs 100-102, and ensure development will not increase flooding elsewhere, through a requisite Flood Risk Assessment, in compliance with NPPF paragraph 103.

WWE3 Water Management

- 13.47 Policy WWE3: Water Management sets out various criteria to ensure that new development is safe from flood risk and that it will not increase the risk of flooding. The policy seeks to minimise the risk that future development locations could be flooded from sewers or add to an existing risk by ensuring that surface water run-off entering the sewer system is kept to an absolute minimum.

WWE3 Water Management

Development must consider the effect on flood risk, on-site and off-site, commensurate with the scale and impact. Development must:

1. be accompanied by a Flood Risk Assessment (where appropriate), to demonstrate that the development, including the access, will be safe, without increasing or exacerbating flood risk elsewhere and where possible will reduce flood risk overall;
2. demonstrate that they pass the Sequential Test and if necessary the Exceptions Test in flood Zones 2 and 3;
3. discharge at greenfield run-off rates for the 1 in 1 and 1 in 100 flood events plus the relevant climate change allowance for greenfield and brownfield sites in accordance with the latest Local Flood Risk Management Strategy;
4. incorporate a Sustainable Drainage System (SuDS) to manage surface water drainage. Where SuDS are provided, arrangements must be put in place for their whole life management and maintenance;
5. separate, minimise and control surface water run-off by discharging in the following order:
 - i. to an infiltration or soak away system;
 - ii. to a watercourse (open or closed);
 - iii. to a surface water sewer, then
 - iv. to a combined sewer.
 However, if sites are within 250m of a tidal estuary or the sea, surface water can be discharged directly);
6. ensure adequate protection where sites may be susceptible to over land flood flows (as shown in the Strategic Flood Risk Assessment) or lie within a Surface Water Risk Area (as shown on the Environment Agency flood maps);
7. incorporate allowance for climate change in accordance with the latest Environment Agency Guidance;
8. make developer contributions, where needed, to ensure that the drainage infrastructure can cope with the capacity needed to support proposed new development;
9. demonstrate control of the quality of surface water run-off during construction and for the lifetime of the development. For all developments the management of water should be an intrinsic part of the overall development; and
10. not have a detrimental impact on the city's water resources, including the Magnesian Limestone Aquifer and its ground source protection zones. Development along the River Wear and coast should take account of the Northumbria River Basin Management Plan, to deliver continuing improvements in water quality.

Positively Prepared

Vision and Strategic Priorities

13.48 The policy will assist the delivery of the vision by supporting climate change resilience, embracing sustainable design principle and reducing the impact of flooding on homes and businesses.

13.49 Policy WWE3 will help to deliver Strategic Priorities 3 and 9.

Draft Plan Comments

13.50 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Northumbrian Water supports the policy.
- Persimmon suggested the policy should include "where necessary".
- Developers consider the policy is a duplicate of CM4.

How Issues Have Been Taken into Account at Publication Draft

13.51 Considerable changes have been made to policies CM4 and CM5 these have been more clearly separate in policies relating to "flood risk and coastal management" and "water management". The reference to "development must" is retained because it is considered that this clearly follows Government policy, including the need to consider both on-site and off-site impacts. The suggestion in part (3) to include reducing "run-off rates" is resisted as this is not what is being requested. SuDS policy is further clarified in the text, including advice on infiltration systems.

Publication Draft Comments

- 13.52 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;
- The Environment Agency supports this policy (PD216).
 - Northumbrian Water supports the policy. However, they indicate that there is a need for a new storage reservoir in the Wearside Area and are concerned that there is no reference to this in the Plan. (PD152 & PD833).
 - Story Homes, Burdon Lane Consortium, Taylor Wimpey and Hellens Land Ltd broadly support the policy but feel that it should be amended to improve flexibility and avoid duplication with Policy WWE2 (PD5372, PD2732, PD3904 & PD5152).
 - The Wears Rivers Trust welcomes the Plan's supports the policy (PD1483).

How Issues Have Been Taken into account prior to Submission

- 13.53 The Council has not proposed any modifications, as a result of the comments above; however, a modification was made for clarity purposes. The policy is considered to be sound. The Council acknowledges support from the Environment Agency and Wear Rivers Trust.
- 13.54 In response to Story Homes, Burdon Lane Consortium, Taylor Wimpey and Hellens Land Ltd, the Council does not consider further changes are required. The Council considers the policy is sufficiently flexible and its policy scope is district to that of WWE2. In response to Northumberland Water; the Council has sought to address infrastructure requirements through the Infrastructure Delivery Plan with Northumbrian Water not expressing the need for a reservoir. In any event the Allocation and Designations Plan (DPD) will seek to allocate and designated land for the purposes of infrastructure requirements.

Duty to Cooperate (SD11)

- 13.55 The Environment Agency supports the policy but within their submission to the draft CSDP consultation the Environment Agency request new criteria setting out that where SuDS are proposed the suitability of the final drainage scheme is taken into consideration and care should be taken to ensure that any SuDS which speed up infiltration into the ground will not encourage leaching of pollutants into the groundwater aquifer. However, as part of the Statement of Common Ground (SD.8k) between the Council and the Environment Agency, both parties agreed that no changes were required to the policy required as this is dealt with at paragraphs 11.20, 11.21, 11.22 and further supported through the hydrological risk assessment requirement set out in paragraph 11.23 and early engagement concerning water matters set out in paragraph 11.25.

Sustainability Appraisal (2017)

- 13.56 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied in include in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

- 13.57 The SA made the following recommendation for changes to be made to the draft plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA9: Water	There is considerable overlap and inconsistency in policy tests between policies	3 policies have been retained but the overlap and inconsistency has

	CM4 – CM6, which impedes the effectiveness of these policies. In the next iteration of the emerging Sunderland CSDP, consideration should therefore be given to rationalising policies CM4 – CM6 into a single policy with clear assessment criteria that are themselves consistent with the NPPF.	been eliminated and is consistent with the NPPF. One policy relates to flood risk and coastal management; one relates to water management; and ne relates to water quality.
SA10: Flood Risk and Coastal Erosion (2)	There is considerable overlap and inconsistency in policy tests between policies CM4 – CM6, which impedes the effectiveness of these policies. In the next iteration of the emerging Sunderland CSDP, consideration should therefore be given to rationalising policies CM4 – CM6 into a single policy with clear assessment criteria that are themselves consistent with the NPPF.	

Sustainability Appraisal (2018) (SD6)

13.58 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	-	~	~	+	~	+	++	++	~	+	~	~	~

13.59 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.60 It is important, especially in the context of climate change to provide appropriate criteria to manage water appropriately. Flooding from sewers is increasingly recognised as an issue in areas that are not necessarily at risk from fluvial flooding – whereby rainfall events, sometimes away from the area concerned, cause major surface water run-off to enter the sewerage system.

13.61 This policy seeks to minimise the risk that future development locations could be flooded from sewers or add to an existing risk by ensuring that surface water run-off entering the sewer system is kept to an absolute minimum. Other benefits of such an approach will include a much reduced risk to water quality. The main objective of the policy is to reduce the risk of flooding and make sure water is managed appropriately. The policy has various components which are justified below:

- **Ensuring development is safe** - Part 1 of the policy sets out the need for a flood risk assessment to demonstrate that a development will be safe and without exacerbating flood risk elsewhere and where possible reduce flood risk elsewhere and seek to reduce flood risk overall. This will ensure that flood risk issues are established in the planning process. This requirement is set out in the NPPF, at paragraph 103, which states that when determining planning applications, Local Planning Authorities should ensure flood risk is not increased elsewhere and only consider development appropriate in areas at risk of flooding where informed by a site-specific flood risk assessment.
- **Sequential and exceptions test** - Part 2 of the proposals sets out applicable proposals should demonstrate development can pass the sequential and exceptions test in flood risk zones 2 and 3. This is important to ensure that development is located in

sustainable locations where flood risk is reduced. The principle of the sequential and exceptions test is set out in the NPPF at paragraph 103 which states that (site specific) flood risk assessments should follow the sequential test and where necessary the exception test.

- **Greenfield runoff rates and climate change allowances** - Part 3 of the policy sets the requirement that development must discharge at greenfield runoff rates for 1 in 1 and 1 in 100 flood events, plus the relevant climate change allowance for greenfield and brownfield sites in accordance with the latest Sunderland City Council Local Flood Risk Management Strategy (March 2016, pg 36) (SP.50)⁴⁷⁸. The importance of this document is set out in the Planning Policy Guidance⁴⁷⁹.
- **Incorporation of sustainable drainage systems (SuDS)** - Part 4 of the policy sets out that development must incorporate SuDS to manage surface water drainage. SuDS form an important component of managing water and are now an established part of flooding best practice. The policy recognises the importance of SuDS and makes sure they feature within proposals. Just as important, is their maintenance through a developments lifetime and thus the requirement for whole life management and maintenance arrangements is set out. Justification for this component of the policy is set out in the NPPF, at paragraph 103, which states that development should give priority to the use of sustainable drainage systems. The PPG also sets out the importance of SuDS, stating they provide opportunities to; reduce the cause and impacts of flooding, remove pollutants from urban run-off at source and combine water management with green space with benefits for amenity, recreation and wildlife⁴⁸⁰.
- **Discharge of surface water runoff** - It is important that surface management is afforded the same importance as fluvial flood risk, given the increase in rainfall intensities due to climate change and the increase in impermeable land use due to development. Part 5 of the policy sets out principles on the discharge of surface water runoff to reinforce the importance of surface water flooding. The policy seeks to, minimise and control surface water runoff by discharging through the order set out in the policy. It is important that surface management is understood, and consequently this part of the policy sets out the preference of surface water runoff discharge. The discharge order is in alignment with building regulations (Part H, H3⁴⁸¹).
- **Setting adequate protection of land flood flows and surface water risk areas** - Part 6 of the policy sets out criteria on where land flood flows and surface water risk areas are identified⁴⁸², adequate protection must be put in place to mitigate possible impacts. This is in alignment with the NPPF which at paragraph 94 states that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations. The importance of over land flood flows and ensuring adequate protection is set out within the SFRA, Level 1 2018, page 67⁴⁸³.

⁴⁷⁸ [https://www.sunderland.gov.uk/media/20950/SP-50-Local-Flood-Risk-Management-Strategy-2016-pdf/SP.50 Local Flood Risk Management Strategy \(2016\).pdf?m=636803143272600000](https://www.sunderland.gov.uk/media/20950/SP-50-Local-Flood-Risk-Management-Strategy-2016-pdf/SP.50%20Local%20Flood%20Risk%20Management%20Strategy%20(2016).pdf?m=636803143272600000)

⁴⁷⁹ See Planning Policy Guidance paragraph: 006 (Reference ID: 7-006-20140306) which states Local planning authorities should work with lead local flood authorities to secure Local Plan policies compatible with the local flood risk management strategy.

⁴⁸⁰ See Planning Policy Guidance paragraph: 051 (Reference ID: 7-051-20150323).

⁴⁸¹ See Building Regulations, H, Part H3 – Rainwater Drainage

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/442889/BR_PDF_AD_H_2015.pdf

⁴⁸² Surface water risk areas as identified on the EA Flood Maps; <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

⁴⁸³ [https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-pdf/SD.49 Sunderland City Council Level 1 - Strategic Flood Risk Assessment \(2018\).pdf?m=636802962946400000](https://www.sunderland.gov.uk/media/20890/SD-49-Sunderland-City-Council-Level-1-Strategic-Flood-Risk-Assessment-2018-pdf/SD.49%20Sunderland%20City%20Council%20Level%201%20-%20Strategic%20Flood%20Risk%20Assessment%20(2018).pdf?m=636802962946400000)

- **Incorporate allowance for climate change** - Part 7 of the policy sets out that development must incorporate a climate change allowance in alignment with Environment Agency guidance. This is necessary in order to make sure that development is sustainable over the lifetime of the development especially in the context of increasing climate change. As identified in the SFRA 2 (2018) (SP.50)⁴⁸⁴ climate change will increase flood risk over the lifetime of a development therefore it considered necessary for the policy to take this into account. Furthermore, NPPF paragraph 94 states Local Planning Authorities should adopt protective strategies to mitigate and adapt to climate change taking full account of flood risk, coastal change and water supply and demand considerations.
- **Developer contributions** - Part 8 of the policy sets out the requirement for developer contributions where needed, to ensure that the drainage infrastructure can cope with the capacity needed to support a new development. This requirement is in alignment with the NPPF, which at paragraphs 203 to 206 set out the criteria for requiring planning obligations (contributions). It considered justified in setting this criteria, as development can have a material impact on the operation of drainage infrastructure and it may be necessary to seek planning obligations to mitigate such impact.
- **Control of surface water run off** - Part 9 sets out that new development must demonstrate control of the quality of surface water runoff during construction and for the lifetime of the development. This is needed to make sure that development does not increase flood risk as in alignment with NPPF, paragraph 94, which directs plans to reduce flood risk.
- **Magnesian limestone aquifer and water resources** - Part 10 sets out that development must not have a detrimental impact on the water resources, including the Magnesian Limestone Aquifer and its ground source protection zones as well as water resources in general. This is needed to ensure water is protected in alignment with the NPPF, which states that local plans should take into account water supply. Protecting the aquifer and water resources in general is very important to ensuring the water quality of the City.

Reasonable Alternatives

13.62 The Council consider there are no reasonable alternatives.

Effective

Deliverable

13.63 The policy will be delivered through the determination of planning applications. Consultation will take place with Council Flood and Coastal Engineers on planning applications and as necessary with the Environment Agency.

13.64 The use of SUDS will need careful consideration on a case by case basis, to be guided by the Environment Agency's approach to groundwater protection.

⁴⁸⁴ [https://www.sunderland.gov.uk/media/20891/SD-50-Sunderland-Flood-Risk-Policy-Level-2-Strategic-Flood-Risk-Assessment-Site-Screening-2018-/pdf/SD.50_Sunderland_Flood_Risk_Policy_Level_2_Strategic_Flood_Risk_Assessment_Site_Screening_\(2018\).pdf?m=636802968502500000](https://www.sunderland.gov.uk/media/20891/SD-50-Sunderland-Flood-Risk-Policy-Level-2-Strategic-Flood-Risk-Assessment-Site-Screening-2018-/pdf/SD.50_Sunderland_Flood_Risk_Policy_Level_2_Strategic_Flood_Risk_Assessment_Site_Screening_(2018).pdf?m=636802968502500000)

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE3	Water management	To reduce the risk of flooding from surface water run-off	<ul style="list-style-type: none"> Significant numbers of new developments do not incorporate SuDS Significant numbers of new developments do not incorporate necessary measures to deal with discharge of surface water 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Number of properties identified as being at risk of potential flooding Applications granted contrary to NWL, LLFA and EA advice Number of flooding instances and events Number of new developments incorporating Surface Water Management Solutions (eg. SuDS) 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbrian Water Ltd Strategic Flood Risk Assessment (SFRA)

Consistent with National Policy

13.65 Policy WWE3 complies with section 10 of the NPPF which seeks to reduce flood risks from surface water run-off. More specifically policy WWE3 makes provision for development proposals to perform a sequential or exceptions test in accordance with NPPF paragraphs 100-102, and ensure development will not increase flooding elsewhere, through a requisite Flood Risk Assessment, and provision of SuDS in compliance with NPPF paragraph 103.

WWE4 Water Quality

13.66 Policy WWE4: Water Quality seeks to protect surface and groundwater bodies (including the Magnesian Limestone Aquifer) in accordance with the Northumbria River Basin Management Plan. The policy seeks to protect water quality by; setting out the need for water quality assessments, discharging of water in an appropriate way, imposing water pollution control measures on infiltration based SuDS and seeking opportunities to improve the river environment.

WWE4 Water Quality

The quantity and quality of surface and groundwater bodies and quality of bathing water shall be protected and where possible enhanced in accordance with the Northumbria River Basin Management Plan.

1. Water quality assessments will be required for:
 - i. any physical modifications to a watercourse; and
 - ii. any development which could indirectly, adversely affect water bodies.
2. Development that discharges water into a watercourse will be required to incorporate appropriate water pollution control measures.
3. Development that incorporates infiltration based SuDS will be required to incorporate appropriate water pollution control measures.
4. Development adjacent to, over or in, a main river or ordinary watercourse should consider opportunities to improve the river environment and water quality by:
 - i. naturalising watercourse channels;

- ii. improving the biodiversity and ecological connectivity of watercourses;
- iii. safeguarding and enlarging river buffers with appropriate habitat; and
- iv. mitigating diffuse agricultural and urban pollution.

Positively Prepared

Vision and Strategic Priorities

13.67 The policy will assist the delivery of the vision by supporting climate change resilience, embracing sustainable design principle and reducing the impact of flooding on homes and businesses.

13.68 Policy WWE4 will help to deliver Strategic Priorities 3, 8 and 9.

Draft Plan Comments

13.69 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Gateshead Council suggested that the Plan includes a policy on the River Don.
- EA support the policy but suggest alternative wording.

How Issues Have Been Taken into Account at Publication Draft

- The Council do not consider it necessary to include a policy on the River Don as the Plan includes numerous policies on waterways, water quality and GI to protect the River Don.
- The Environment Agency's comments have been noted and agreed. The policy has been comprehensively re-worded and based on Environment Agency recommendations.

Publication Draft Comments

13.70 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- The Environment Agency and Taylor Wimpey support the policy (PD211 & PD3914).

How Issues Have Been Taken into account prior to Submission

13.71 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledges the support from the Environment Agency and Taylor Wimpey.

Proposed Modifications to the Publication Draft

- The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
11.24	The <u>Water Framework Directive</u> (WFD) became part of UK law in 2003	For clarity

Duty to Cooperate (SD11)

13.72 The Environment Agency supports the policy but within their submission to the draft CSDP consultation the Environment Agency request new criteria setting out that where SuDS are proposed the suitability of the final drainage scheme is taken into consideration and care should be taken to ensure that any SuDS which speed up infiltration into the ground will not encourage leaching of pollutants into the groundwater aquifer. However, as part of the Statement of Common Ground (SD.8k) between the Council and the Environment Agency, both parties agreed that no changes were required to the policy required as this is dealt with at paragraphs 11.20, 11.21, 11.22 and further supported through the hydrological risk assessment requirement set out in paragraph 11.23 and early engagement concerning water matters set out in paragraph 11.25.

Sustainability Appraisal (2017)

13.73 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied in include in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

13.74 The SA made the following recommendation for changes to be made to the draft plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA9: Water	There is considerable overlap and inconsistency in policy tests between policies CM4 – CM6, which impedes the effectiveness of these policies. In the next iteration of the emerging Sunderland CSDP, consideration should therefore be given to rationalising policies CM4 – CM6 into a single policy with clear assessment criteria that are themselves consistent with the NPPF.	The Policy has been reworded to support the redevelopment of contaminated land. Policy SP2 seeks to maximise the use of previously developed land. We have retained 3 policies, but the overlap and inconsistency has been eliminated and is consistent with the NPPF. Policy CM4 relates to flood risk and coastal management; CM5 relates to water management; and CM6 relates to water quality. CM4 has been extended to include coast.

Sustainability Appraisal (2018) (SD5)

13.75 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	~	~	~	+	~	+	++	++	~	~	~	~	~

13.76 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.77 The policy seeks to protect water quality by protecting and enhancing water assets. The policy has four components as set out below:

- Protecting watercourses and water bodies** - It is important that watercourse and water bodies are protected. These assets are important from both a flood risk perspective and are natural assets in their own right. Sunderland contains substantial water assets such as the River Wear and River Don, in total the city contains 26.5 km of inland designated main rivers and another 37 km of Ordinary Watercourses. It is important to make sure these watercourses and water bodies are protected. Part 1 of the policy therefore sets out that water quality assessments will be required where proposals would physically modify a water course or indirectly adversely affect water bodies. The importance of water bodies is set out in PPG which states that plan making may need to consider the type or location of new development where an

assessment of the potential impacts on water bodies may be required⁴⁸⁵. The PPG goes on to state that indirectly impacting on water bodies as a result of new development is a consideration for planning applications. Consequently, the policy therefore sets an appropriate basis for assessing the impact of development on watercourses and water bodies which are important blue infrastructure assets with the water quality assessment providing an appropriate mechanism to assess relevant issues.

- **Discharging water into a water course** - Water should be discharged in an appropriate way. Watercourses are sensitive and discharge can have harmful impacts. Consequently, part 2 of the policy seeks to set out criteria to manage the possible discharge into a watercourse, by requiring proposals to incorporate appropriate water pollution control measures. Given the importance of courses (as set out in the bullet point above) it is appropriate to make criteria for the impact of discharge and pollutants potentially entering a water course.
- **Infiltration based SuDS and water control measures** - Part 3 of the policy sets out that where infiltration based SuDS are proposed they will be required to incorporate appropriate water pollution control measures. The potential to pollute groundwater aquifers is significant. Consequently, there is a need to ensure that infiltration based SuDS, (which are designed to capture surface water runoff and allow it to infiltrate and soak through the subsoil layer, before infiltrating the water table below) do not pollute groundwater which is a significant fresh water resource for the city. Protecting the water quality of the City is a significant issue and this component of the policy is aimed to make sure water quality is protected. The NPPF, at paragraph 99, states that local plans should take into account water supply. The European Union Water Framework Directive also sets out a requirement to prevent the deterioration of aquatic ecosystems and protect, enhance and restore water bodies to good status.
- **Improving the river environment** - Part 4 of the policy sets out that where proposals are; adjacent, over or in a main river or ordinary water course proposals should look for opportunities to consider opportunities to improve the river environment and water quality. The Council considers these four components as significant ways in which the river environment can be improved. This is important in order to make sure that natural assets are improved. Furthermore, the NPPF, at paragraph 109 states the planning system should contrite and enhance the natural and local environment by minimising the impacts on biodiversity and providing net gains in biodiversity where possible.

Reasonable Alternatives

13.78 The Council consider there are no reasonable alternatives.

Effective Deliverable

13.79 The policy will be delivered through the determination of planning applications. Consultation will take place with Council Flood and Coastal Engineers on planning applications and as necessary with the Environment Agency.

⁴⁸⁵ Planning Policy Guidance: Paragraph: 006 Reference ID: 34-006-20161116

13.80 Early engagement with the local planning authority, the LLFA, Environment Agency and relevant water and sewerage companies can help to establish if water quality is likely to be a significant planning concern and, if it is, to clarify what assessment will be needed to support the application. Applicants should provide sufficient information for the Council to be able to identify the likely impacts on water quality. The information supplied should be proportionate to the nature and scale of the development proposed and the level of concern about water quality.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 4	Water quality	Protect water quality in accordance with the Northumbria River Basin Management Plan	<ul style="list-style-type: none"> Significant number of applications submitted without a water quality assessment Any planning permissions granted contrary to NWL, LLFA, and EA advice Significant numbers of new developments do not incorporate SuDS Significant numbers of new developments do not incorporate necessary measures to deal with discharge of surface water 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Improvement in groundwater quality 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Lead Local Flood Authority (LLFA) Environment Agency 'Catchment Data Explorer' Northumbria Water Ltd Strategic Flood Risk Assessment (SFRA)

Consistent with National Policy

13.81 The policy complies with the NPPF and in particular the emphasis within national policy on ensuring sufficient levels of water supply (NPPF paragraph 99). It aligns to NPPF paragraph 143, which sets out that plans should set out criteria regarding the impacts on the flow and quantity of surface and groundwater. Furthermore, the policy is in alignment with NPPF paragraph 109 which seeks to protect new and existing development from contributing to or being put at unacceptable risk from water pollution.

WWE5 Disposal of Foul Water

13.82 Policy WWE5: Disposal of Foul Water sets out appropriate policy criteria regarding the appropriate disposal of foul water for new development. It sets out the preferred drainage hierarchy at part 1. Part 2, sets out that development involving the use of non-main methods of drainage in areas where public sewage existing or the use of cess puts will not be permitted. Part 3 sets out criteria regarding development of new or extensions/ improvements to existing waste water, sludge or sewage treatment works.

WWE5 Disposal of Foul Water

1. Development should utilise the following drainage hierarchy:
 - i. connection to a public sewer;
 - ii. package sewage treatment plant (which can be offered to the Sewerage Undertaker for adoption); then
 - iii. septic tank.
2. Development involving the use of non-main methods of drainage in areas where public sewerage exists or the use of Cess Pits will not be permitted.
3. Development of new or extensions/ improvements to existing waste water, sludge or sewage treatment works, will normally be supported unless the adverse impact of the development significantly outweighs the need for greater capacity.

Positively Prepared

Vision and Strategic Priorities

13.83 The policy will assist the delivery of the spatial vision by supporting climate change resilience, embracing sustainable design principle and reducing the impact of flooding on homes and businesses.

13.84 Policy WWE5 will help to deliver Strategic Priorities 8, 9 and 10.

Draft Plan Comments

13.85 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation;

- Developers suggested alternative wording to address a typing error.

How Issues Have Been Taken into Account at Publication Draft

13.86 The Council note the representation from the developer suggesting alternative wording.

Publication Draft Comments

13.87 As set out in the Consultation Statement (SD.7), the following issues were raised during Publication Draft consultation;

- The Environment Agency supports this policy, but would like the policy to require any development proposing to discharge trade effluents to provide a Water Management Plan (PD217).
- Northumbrian Water broadly supports the policy, but would like it to also cover water treatment works (PD2669).

How Issues Have Been Taken into account prior to Submission

13.88 In response to the representation raised by the Environment Agency, the Council has proposed a modification which will be put to the appointed planning Inspector during the examination. This was agreed within the Statement of Common Ground (SD.8k) with the Council and the Environment Agency. In response to Northumbrian Water, the policy deals with foul water disposal, rather than drinking water, it is therefore not considered that any modifications are required to address the comments raised by the Northumbrian Water.

Duty to Cooperate (SD11)

13.89 The Environment Agency supports the policy but recommend that it also covers the requirement for developments proposing the discharge of trade effluents (e.g. car wash development) to provide a Water Management Plan. As part of the Statement of Common Ground between the Council and the Environment Agency, both parties agreed a proposed major modification which will be put to the appointed planning Inspector during the examination. The proposed changes are set out within the Statement of Common Ground (SD.8k) document between the Council and the Environment Agency.

Sustainability Appraisal (2017)

13.90 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

13.91 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

13.92 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	~	~	~	~	+	~	+	+	+	~	~	~	~	~

13.93 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.94 Sewerage is the network of sewers, pipes and pumps that lie unseen beneath virtually every street and road. Sewers carry sewage from where it is produced to the sewage treatment works to be treated and cleaned. The sewerage systems can be either combined, carrying both sewage and rain water or separate systems.

13.95 It is important that development takes into account both foul water and sewage through the planning process. The policy provides justified criteria for assessing drainage of development. Part 1 of the policy sets out the drainage hierarchy which has been set in alignment with building regulations (Requirement H1 – Foul Water Drainage). The rest of the policy sets out other criteria on drainage. Part 2 set outs that development which uses non-main methods of drainage in areas of a public sewer or cess pits will not be permitted. This is considered appropriate to make sure that sewage is managed in the most effective way. Part 3 sets out support for the development of new or improvements to existing wastewater, sludge or sewage treatment works unless the adverse impact is significant.

This provides a positive basis for assessing the expansion of waste water assets and is consequently considered justified.

13.96 Whilst the Council consider the policy to be sound and justified in its existing form. The Council have agreed to make a proposed modification subject to planning inspector agreement. This proposed major modification will improve the policy through the introduction of new criteria on trade effluent. It sets out that where development involves the disposal of trade effluent a Foul Water Management Plan / Drainage Assessment will be required to demonstrate how the disposal of foul water is undertaken. Although the policy improves the policy the Council consider the policy justified in its existing form, as the three existing components of the policy (parts 1,2 and 3) already provide sufficient criteria on the appropriate drainage for all forms of development.

Reasonable Alternatives

13.97 The Council consider there are no reasonable alternatives.

Effective

Deliverable

13.98 The policy will be delivered through the determination of planning applications and Building regulations. Consultation will take place with Northumbria Water.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE5	Disposal of foul water	Sets out how foul water must be disposed of	<ul style="list-style-type: none"> Any planning permissions granted contrary to NWL and EA advice Significant numbers of new developments do not incorporate necessary measures to deal with discharge of surface water Increase in the number of applications for development 	<ul style="list-style-type: none"> Identification of reason for under-performance/under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly EA and NWL Potential review of strategic approach to identification of land for development (including land allocations in the Local Plan) Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Development of waste water, sludge or sewage treatment works 	<ul style="list-style-type: none"> SCC monitoring data Planning applications EA planning applications monitoring

involving
non-main
methods
of
drainage –
particularly
cess pits

Consistent with National Policy

13.99 Para 156 of the NPPF states that local authorities should set out strategic priorities for the area, including the provision of infrastructure for waste water. This policy therefore complies with the NPPF.

WWE6 Waste Management

13.100 Policy WWE6: Waste Management sets out the Council's strategic approach to waste providing a strategic planning framework to minimise the negative effects of management of waste on human health and the environment. The policy favours the application of the waste hierarchy and seeks to support the delivery of waste management facilities, which aid in the movement of waste up the hierarchy, are considered critical infrastructure and support sustainable growth and sustainable neighbourhoods.

WWE6 Waste Management

Development that encourages and supports the minimisation of waste production, and the re-use and recovery of waste materials including, for example, re-cycling, composting and Energy from Waste will normally be supported. Proposals for waste management facilities to deal with waste arisings will be encouraged based upon the following principles:

1. managing waste through the waste hierarchy in sequential order. Sites for the disposal of waste will only be permitted where it meets a need which cannot be met by treatment higher in the waste hierarchy;
2. promoting the opportunities for on-site management of waste where it arises and encouraging co-location of waste developments that can use each other's waste materials;
3. ensuring that sufficient capacity is located within the city to accommodate forecast waste arisings of all types during the Plan period, reducing the reliance on other authority areas;
4. supporting delivery of the South Tyne and Wear Joint Municipal Waste Management Strategy;
5. facilitating the development of recycling facilities across the city including civic amenity sites and small recycling 'bring' banks to ensure there is sufficient capacity and access for the deposit of municipal waste for re-use, recycling and disposal;
6. facilitating the development of a network of small scale local waste management facilities in accessible locations, and effective methods of waste management such as suitable facilities to separate or store different types of waste, including materials that are required to be separated for kerbside collection schemes;
7. ensuring new waste developments are located and designed to avoid unacceptable adverse impacts on landscape, wildlife, heritage assets and amenity;
8. working collaboratively with neighbouring local authorities with responsibilities for waste and other local authorities where waste import/export relationships exist. This will ensure a co-operative cross boundary approach to waste management is established and maintained; and
9. addressing to an acceptable standard the potential cumulative impacts of any waste development and the way it relates to existing developments.

Positively Prepared

Vision and Strategic Priorities

13.101 The policy will assist the delivery of the vision by managing waste as a resource and minimising the amount produced and sent to landfill.

13.102 Policy WWE6 will help to deliver Strategic Priorities 1, 2 and 10.

Draft Plan Comments

13.103 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Highways England Support the Policy.

How Issues Have Been Taken into Account at Publication Draft

13.104 No issues identified.

Publication Draft Comments

13.105 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Historic England support the policy (PD114).
- South Tyneside Council welcome the ongoing support to the South Tyneside and Wear Joint Municipal Waste Management Strategy (PD4424).
- Durham County Council suggest that further duty-to-cooperate discussions are held regarding the disposal of inert waste (PD1400).

How Issues Have Been Taken into account prior to Submission

13.106 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council will undertake further duty-to-cooperate discussions with regard to the disposal of inert waste. Any necessary allocations will be made through the Allocations and Designations Plan. The Council acknowledges support from Historic England.

Duty to Cooperate (SD11)

13.107 The Council works collaboratively with neighbouring authorities on waste matters. The Council has progressed a joint approach to the procurement of waste services through the South Tyne and Wear Waste Management Partnership (STWWMP). The Partnership comprises of Sunderland City Council, Gateshead Council and South Tyneside Council who have collectively prepared the Joint Municipal Waste Strategy⁴⁸⁶, which was published in October 2007. The strategy covers the period up to 2027; however the Council is committed to working strategically on waste matters beyond this period.

Sustainability Appraisal (2017)

13.108 The following table is a visual summary of the detailed assessment provided in SA Appendix D . This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?	?			?									

13.109 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA13 Waste and Natural Resources	To minimise duplication between policies, in the next iteration of the	Some minor amendments to policies have been made. Plan now

⁴⁸⁶ https://www.sunderland.gov.uk/media/20898/SD-56-South-Tyne-Wear-Waste-Management-Partnership-Joint-Municipal-Waste-Management-Strategy-2007-/pdf/SD.56_South_Tyne_and_Wear_Waste_Management_Partnership_-_Joint_Municipal_Waste_Management_Strategy_.pdf?m=636803109282770000

	<p>emerging Sunderland CSDP it is recommended that policy WM1 – Waste Management should be recast to focus on strategic criteria, including setting out a clear waste hierarchy, identifying waste management capacity requirements, establishing the need for development and directing proposals to preferred locations. Policy WM2 – Waste Facilities should be dedicated to assessing all waste management development proposals against design, environmental and amenity criteria.</p>	<p>makes it clear which policies are considered to be strategic and which are local. No further changes considered necessary.</p>
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Sustainability Appraisal (2018) (SD5)

13.110 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	~	~	+	0	~	+	++	++	++	+	++	++	++

13.111 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.112 The policy sets out the Council’s strategic approach to waste taking into account national and other guidance. It provides a strategic planning framework to minimise the negative effects of the generation and management of waste on human health and the environment. The policy favours the application of the waste hierarchy (as shown below) and seeks to support the delivery of waste management facilities, which aid in the

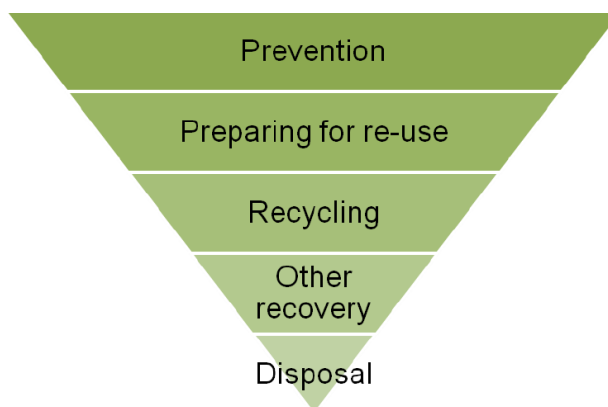


Figure 60 Waste Hierarchy

movement of waste up the hierarchy, are considered critical infrastructure and support sustainable growth and sustainable neighbourhoods.

13.113 The Waste Arisings and Capacity Requirements Report (2018) (SD.55)⁴⁸⁷ presents a detailed assessment of need for future waste management capacity over the period up to 31st December 2035. This addresses waste from a number of different waste streams. The report indicates that there is anticipated to be sufficient capacity to manage most waste

⁴⁸⁷[https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-pdf/SD.55_Sunderland_City_Council_-_Waste_Arisings_and_Capacity_Requirements_\(2018\).pdf?m=636803108519630000](https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-pdf/SD.55_Sunderland_City_Council_-_Waste_Arisings_and_Capacity_Requirements_(2018).pdf?m=636803108519630000)

streams throughout the plan period, however there is anticipated to be some requirement for additional capacity for landfill and energy from waste sites later in the plan period.

- 13.114 The policy puts in place the principles of identifying appropriate locations for waste management facilities. These principles are key to ensuring much needed waste management infrastructure is delivered in the most sustainable and effective way for the treatment of waste and the avoidance of potential negative impacts. However, the Allocations and Designations Plan will identify specific site allocations for waste sites, where necessary. The Council will work closely with other neighbouring authorities on the identification of sites in recognition that waste planning is a strategic matter and that many waste sites are able to process waste from a number of authority areas.
- 13.115 The council's aim for waste management is to recycle 50% of waste from households by 2020, under the EU Waste Framework Directive and to recover 70% of construction and demolition waste by 2020. Therefore an adequate range of waste management facilities should be provided to ensure that waste is treated and disposed of in a sustainable and environmentally acceptable way, balancing the social and environmental needs of the city. Waste management facilities will need to have the potential to meet the Government's waste management targets whilst taking into account potential spare capacity in adjacent local authority areas.
- 13.116 Sunderland has progressed a joint approach to the procurement of waste services, along with the councils of South Tyneside and Gateshead, known as the "South Tyne and Wear Waste Management Partnership" (STWWMP). Guided by the Joint Municipal Waste Strategy (2007) (SD.56)⁴⁸⁸, the partnership has developed a longer-term strategic solution for the treatment and disposal of residual municipal waste. A contract has been secured for the city's residual municipal waste to be treated at a new Energy from Waste Facility at Haverton Hill in Teesside.
- 13.117 The contract involved building an Energy from Waste facility which will burn the waste to create electricity. A new waste transfer facility station has also been granted consent and has been developed at Jack Crawford House depot, in Hendon. Both sites are now operational.
- 13.118 The contract commenced April 2014 and will run for 23 years. It provides for three waste transfer stations, with some limited front end recycling of bulky waste with the majority of residual household waste transferred by bulk road haulage to a dedicated EFW facility at the Haverton Hill waste complex. The plant will be able to deal with up to 256,000 tonnes of waste each year and is capable of exporting 18.84MW of electricity to the national grid. The facility is supported by a Visitor and Education Centre at Gateshead's waste transfer facility, which is located within Sunderland's boundary at the Campground site in Springwell. This contract therefore ensures that there is sufficient capacity to manage municipal waste over the plan period.
- 13.119 Part 6 of the policy seeks to ensure that proposals for waste development would not have unacceptable adverse impacts on landscape, wildlife, heritage assets and amenity.

⁴⁸⁸ [https://www.sunderland.gov.uk/media/20898/SD-56-South-Tyne-Wear-Waste-Management-Partnership-Joint-Municipal-Waste-Management-Strategy-2007-/pdf/SD.56_South_Tyne_and_Wear_Waste_Management_Partnership_-_Joint_Municipal_Waste_Management_Strategy_\(.pdf?m=636803109282770000](https://www.sunderland.gov.uk/media/20898/SD-56-South-Tyne-Wear-Waste-Management-Partnership-Joint-Municipal-Waste-Management-Strategy-2007-/pdf/SD.56_South_Tyne_and_Wear_Waste_Management_Partnership_-_Joint_Municipal_Waste_Management_Strategy_(.pdf?m=636803109282770000) Please note that alongside the Joint Municipal Waste Strategy (2007) a supplementary South Tyne & Wear Waste Management Partnership: Joint Municipal Waste Management Strategy Review (2012) (SD.64).

Applicants will be expected to submit a supporting statement alongside any planning applications to demonstrate compliance with this part of the policy.

13.120 When considering the potential impacts of a scheme, applicants will also be expected to consider cumulative impacts and how the proposals may impact upon existing nearby land uses and/or other committed development proposals. Each application will be considered on a site by site basis.

Reasonable Alternatives

13.121 The Council consider there are no reasonable alternatives

Effective

Deliverable

13.122 The Council recognises that waste is a cross boundary issue and therefore work in partnership with Gateshead and South Tyneside on waste management issues as part of the South Tyne and Wear Waste Management Partnership. The policy will be delivered through the submission and determination of planning applications for waste development and through the Joint Municipal Waste Strategy. Where necessary, specific site allocations for waste facilities will be identified through the Site Allocations and Designations Plan.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 6	Waste management	Encourages the application of the waste hierarchy and seeks to support the delivery of waste management facilities	<ul style="list-style-type: none"> Significant increase in overall level of waste managed per head of population Significant increase in the amount of waste sent to landfill and/or reduction in amount managed by sustainable methods 	<ul style="list-style-type: none"> Identification of reasons for under-performance and/or under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly waste operators Review evidence base with regard to waste management Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Municipal waste arisings Household waste collected Percentage of household waste recycled Development of new waste management facilities 	<ul style="list-style-type: none"> SCC and regional/sub-regional monitoring data South Tyne & Wear Waste Management Partnership (STWWMP) Planning applications Waste operators

Consistent with National Policy

13.123 The policy is consistent with Paragraph 3 of the National Planning Policy for Waste (NPPW) by identifying suitable sites and areas for waste development and seeking to manage waste higher up the waste hierarchy. The policy also indicates that the Council will work collaboratively with other waste planning authorities through the statutory duty to cooperate, to provide a suitable framework of facilities to deliver sustainable waste management.

WWE7 Waste Facilities

13.124 Policy WWE7: Waste Facilities seeks to direct facilities to previously developed sites within existing employment areas. This approach ensures that waste management development is not located close to particularly sensitive uses such as residential areas, where conflicts may arise due to the noise and disturbance often generated from waste management operations.

WWE7 Waste Facilities

Development for new built waste facilities should be focused on previously developed employment land (excluding land within Primary Employment Sites) and will be required to meet the following criteria:

1. demonstrate the need for the facility, if there is a clear conflict with other policies of the Development Plan;
2. all waste processes and operations must be contained, processed and managed within buildings unless there are acceptable operational reasons why these processes cannot be contained within buildings;
3. proposals must accord with all other policies in relation to the protection of the environment and public amenity or demonstrate that other material considerations outweigh any policy conflict;
4. consideration will be given to the potential impacts of waste management proposals from:
 - i. harmful materials entering the public highway;
 - ii. generation of odours, litter, light, dusts, flies, rodents, birds and other infestation;
 - iii. noise, excessive traffic and vibration;
 - iv. risk of serious fires through combustion of accumulated wastes;
 - v. harm to water quality and resources and flood risk management;
 - vi. land instability;
 - vii. land use conflict; and
 - viii. where necessary, mitigation measures should be identified to ameliorate any negative impacts to an acceptable level.

Positively Prepared

Vision and Strategic Priorities

13.125 The policy will assist the delivery of the vision by managing waste as a resource and minimising the amount produced and sent to landfill.

13.126 Policy WWE7 will help to deliver Strategic Priorities 1, 2 and 10.

Draft Plan Comments

13.127 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Highways England and the Environment Agency generally support the policy.

How Issues Have Been Taken into account at Publication Draft

13.128 The council acknowledge Highways England and The Environment Agencies support.

Publication Draft Comments

13.129 As set out in the Consultation Statement (SD07), no key issues were raised against policy WWE7.

How Issues Have Been Taken into account prior to Submission

13.130 As set out in the Consultation Statement (SD07), no key issues were raised against policy WWE7.

Duty to Cooperate (SD11)

13.131 The Council works collaboratively with neighbouring authorities on waste matters. The Council has progressed a joint approach to the procurement of waste services through the South Tyne and Wear Waste Management Partnership (STWWMP). The Partnership comprises of Sunderland City Council, Gateshead Council and South Tyneside Council who have collectively prepared the Joint Municipal Waste Strategy, which was published in October 2007. The strategy covers the period up to 2027, however the Council is committed to working strategically on waste matters beyond this period.

13.132 As part of the Partnership, a contract has been secured for the management of the city's municipal waste. The contract commenced April 2014 and will run for 23 years. It provides for three waste transfer stations, with some limited front end recycling of bulky waste with the majority of residual household waste transferred by bulk road haulage to a dedicated EFW facility at the Haverton Hill waste complex. The plant is able to deal with up to 256,000 tonnes of waste each year and is capable of exporting 18.84MW of electricity to the national grid. The facility is supported by a Visitor and Education Centre at Gateshead's waste transfer facility, which is located within Sunderland's boundary at the Campground site in Springwell. This contract therefore ensures that there is sufficient capacity to manage municipal waste over the plan period.

13.133 The Council will continue to work closely with neighbouring authorities on waste planning matters and will seek allocate any necessary waste sites within Sunderland through the emerging Allocations and Designations Plan.

Sustainability Appraisal (2017)

13.134 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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13.135 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA13 Waste and Natural Resources	To minimise duplication between policies, in the next iteration of the emerging Sunderland CSDP it is recommended that policy WM1 – Waste Management should be recast to focus on strategic criteria, including setting out a clear waste hierarchy, identifying waste management capacity requirements, establishing the need for development and directing proposals to preferred locations.	Some minor amendments to policies have been made. Plan now makes it clear which policies are considered to be strategic and which are local. No further changes considered necessary.

	Policy WM2 – Waste Facilities should be dedicated to assessing all waste management development proposals against design, environmental and amenity criteria.	
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Sustainability Appraisal (2018) (SD5)

13.136 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	+	~	+	+	++	++	++	+	~	++	~

13.137 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.138 A Waste Arisings and Capacity Requirements Report (SD.55)⁴⁸⁹ has been undertaken to review the existing operating capacity of waste infrastructure across Sunderland and to assess future requirements over the Plan period. However, because the Local Authority Collected Waste (LACW) contract is in place, this assessment has not sought to assess this waste stream as there are no anticipated requirements for managing residual waste. Due to the operational nature of waste management sites, they are generally considered to be compatible with existing industrial areas. The policy therefore seeks to direct facilities to previously developed sites within existing employment areas. This ensures that waste management development is not located close to particularly sensitive uses such as residential areas, where conflicts may arise due to the noise and disturbance often generated from waste management operations. Whilst the Council will support the development of new built waste facilities on Key Employment Areas (as designated under Policy EG2), it is not considered that waste facilities would be appropriate on Primary Employment Areas (as designated under Policy EG1). The Primary Employment Areas are considered to be the most desirable flagship employment areas of the city, containing a range of office and light industrial based development. It is not considered that waste facilities would be compatible with these environments.

13.139 Applicants will be expected to demonstrate the need for the facility in terms of the type of facility and taking account of the capacity findings. To ensure waste management sites operate without detriment to amenity, public safety and without having a significant adverse effect on the environment and appearance of the proposed development site, it is expected that proposals will be located within buildings, unless there are specific operational reasons why this is not possible. In such circumstances, the applicant will be expected to specify the activities which would take place outside of the building structure quantify the impact of this activity on nearby sensitive receptors and provide a scheme of.

13.140 When considering amenity issues, careful consideration should be given to potential cumulative impacts. Specific allocations where required to meet identified requirements, will be made within the Allocations and Designations Plan.

⁴⁸⁹ [https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-/pdf/SD.55 Sunderland City Council - Waste Arisings and Capacity Requirements \(2018\).pdf?m=636803108519630000](https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-/pdf/SD.55%20Sunderland%20City%20Council%20-%20Waste%20Arisings%20and%20Capacity%20Requirements%20(2018).pdf?m=636803108519630000)

Reasonable Alternatives

13.141 The Council consider there are no reasonable alternatives

Effective

Deliverable

13.142 The policy will be delivered through the submission and determination of planning applications for waste facilities. The applicant will be expected to submit supporting information to demonstrate the potential impacts of development and identify any necessary mitigation required. Any necessary mitigation will be secured through planning conditions and/or legal agreements.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE7	Waste facilities	Sets out the criteria and supporting information require to assess a planning application	<ul style="list-style-type: none"> • Significant increase in overall level of waste managed per head of population • Significant increase in the amount of waste sent to landfill and/or reduction in amount managed by sustainable methods 	<ul style="list-style-type: none"> • Identification of reason for under-performance and/or under-delivery • Review objectives of the policy in partnership with key external stakeholders, particularly waste operators • Review evidence base with regard to waste management • Potential review of the Policy/Plan 	<ul style="list-style-type: none"> • Development of new waste management facilities • Air quality • Amount of waste sent to landfill and/or reduction in amount managed by sustainable methods • Municipal waste arising 	<ul style="list-style-type: none"> • SCC and regional/sub-regional monitoring data • South Tyne & Wear Waste Management Partnership (STWMP) • Planning applications • Waste operators • Air Quality Annual Status Report • National CO₂ emissions

Consistent with National Policy

13.143 The policy is consistent with Paragraphs 4 and 5 of the NPPW by identifying suitable sites and areas for waste development. In particular, the policy gives priority to the re-use of previously developed land and sites identified for employment uses in accordance with Paragraph 4. In accordance with Paragraph 5, the policy sets out that the proposals should consider the physical and environmental constraints on site and the potential capacity of existing and potential transport infrastructure to support the sustainable movement of waste.

WWE8 Safeguarding Waste Facilities

13.144 There are a number of existing waste management facilities across Sunderland. These help to manage waste arising within the city and remain an important function for the processing of waste. Policy WWE8: Safeguarding Waste Facilities sets out that these facilities will be safeguarded from inappropriate development in order to maintain existing levels of waste management capacity and to aid delivery of the Joint Municipal Waste Strategy (SD.56)

WWE8 Safeguarding Waste Facilities

The council will safeguard all existing waste management sites within Sunderland from inappropriate development in order to maintain existing levels of waste management capacity and to aid delivery of the Joint Municipal Waste Strategy, including those sites identified within Table 2, as well as planned future replacement facilities for existing Household Waste Recycling Centre's and commercial facilities required for the management of LACW or other waste streams, unless it can be demonstrated that:

1. there is no longer a need for the facility; and
2. capacity can be met elsewhere; or
3. appropriate compensatory provision is made in appropriate locations elsewhere in the city; or
4. the site is required to facilitate the strategic objectives of the city.

Positively Prepared

Vision and Strategic Priorities

13.145 The policy will assist the delivery of the spatial vision by managing waste as a resource and minimising the amount produced and sent to landfill.

13.146 Policy WWE8 will help to deliver Strategic Priorities 2 and 10.

Draft Plan Comments

13.147 As set out in the Consultation Statement (SD.7), the following issues were raised during the draft Plan consultation;

- Thompsons of Prudhoe would like the policy to safeguard other waste management sites including Springwell Quarry.
- Durham Council also indicated that the policy should safeguard strategically important sites for all waste streams, not just local authority collected waste. Durham Council also indicates that the JBT Waste Transfer site was located in County Durham.

How Issues Have Been Taken into Account at Publication Draft

- The policy was amended to safeguard all waste management sites. The supporting text was also updated to indicate that the JBT Waste Transfer Station is in County Durham.

Publication Draft Comments

13.148 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Durham County Council welcomes amendments to the policy (PD1399).
- Thompsons of Prudhoe express concern regarding the loss of recycling capacity between 2020 and 2025. Would like to see Springwell Quarry identified as a safeguarded site (PD193).

How Issues Have Been Taken into account prior to Submission

13.149 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. The Council acknowledges Durham County Council's comments. In response to Thompsons of Prudhoe, the policy already safeguards all

existing waste management sites. Any necessary allocations will be made through the Allocations and Designations Plan.

Duty to Cooperate (SD11)

13.150 Durham County Council requested that the policy was updated to safeguard all strategically important sites and that the JBT Waste Transfer Station was located within County Durham. The policy and supporting text have been updated to address these concerns.

Sustainability Appraisal (2017)

13.151 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?	?												

13.152 The SA made no recommendations for changes to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

13.153 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	+	~	~	~	~	~	~	~	++	~	~

13.154 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.155 There are a number of existing waste management facilities which help to manage waste arisings within the city which remain an important function for the processing of waste materials. A list of existing waste sites is contained within Appendix 10 of the Waste Arisings and Capacity Report (pg57-58) (SD.55)⁴⁹⁰. When determining applications for non-waste development within a distance that could affect the operations of these existing facilities, regard will be had to any potential adverse impact the proposed development might have on the future of the site as a location for waste management. If a development is likely to have an unacceptable impact on the future of the site as a location for waste management it will be refused, unless it is demonstrated by the applicant that there is no longer a need for the site as a location for waste management, or there is an overriding need for the non-waste development in that location.

13.156 In order to ensure that there is sufficient capacity within the city to deal with waste arisings, other than those which are to be sent to the EFW plant at Haverton Hill (which has a contract in place for the management of residual LACW), the policy seeks to protect these facilities. However, it is recognised that in some circumstances there may no longer be a need for the facility. In such circumstances, the loss of waste management sites will be supported where the capacity can be met elsewhere, appropriate compensatory provision is made in appropriate locations elsewhere, or the site is required to facilitate the strategic objectives of the Council.

⁴⁹⁰ [https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-/pdf/SD.55 Sunderland City Council - Waste Arisings and Capacity Requirements \(2018\).pdf?m=636803108519630000](https://www.sunderland.gov.uk/media/20897/SD-55-Sunderland-City-Council-Waste-Arisings-and-Capacity-Requirements-2018-/pdf/SD.55%20Sunderland%20City%20Council%20-%20Waste%20Arisings%20and%20Capacity%20Requirements%20(2018).pdf?m=636803108519630000)

13.157 The purpose of this policy is to safeguard those sites required for the delivery of the Joint Municipal Waste Management Strategy (SD.56)⁴⁹¹ and all other existing waste management sites to protect them against potential future conflict with incompatible uses, as well as protecting existing waste management infrastructure in Sunderland to ensure sufficient capacity is maintained to manage expected levels of waste over the Plan period. This is important because the predicted future need for additional waste management capacity assumes existing capacity is available (except where known closure has been identified within the Plan period). Should the continuation or potential expansion of sites be affected by non-waste development this would impact on the ability of Sunderland to manage its waste. Policy HS1 of the Plan sets out the material planning considerations in this regard.

13.158 It is also important to note that Household Waste Recycling Centre’s are often located relatively near to residential areas to ensure they are accessible to the public for whom they are intended. Paragraph 1 of the National Planning Policy for Waste states the need to ensure that ‘waste management is considered alongside other spatial planning concerns, such as housing and transport, recognising the positive contribution that waste management can make to the development of sustainable communities’. This statement is clear that waste development needs should be considered alongside other development and the importance of the future need for waste facilities should be considered when determining non-waste applications.

Reasonable Alternatives

13.159 The Council consider there are no reasonable alternatives

Effective Deliverable

13.160 The policy will be delivered through the submission and determination of planning applications for non-waste development proposals in close proximity to existing waste management facilities.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 8	Safeguarding waste facilities	To protect waste facilities in the City and sets out the circumstances where they would be considered for alternative uses	<ul style="list-style-type: none"> Significant increase in overall level of waste managed per head of population Significant increase in the amount of waste sent to landfill and/or 	<ul style="list-style-type: none"> Identification of reasons for under-performance and/or under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly waste operators Review 	<ul style="list-style-type: none"> Municipal waste arising Household waste collected Loss of existing and development of new waste management facilities 	<ul style="list-style-type: none"> SCC monitoring data South Tyne & Wear Waste Management Partnership (STWWM P) Planning applications Waste operator

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reduction in amount managed by sustainable methods	<ul style="list-style-type: none"> • Significant loss of existing waste management facilities 	evidence base with regard to waste management	s
		<ul style="list-style-type: none"> • Potential review of the Policy/Plan 	

Consistent with National Policy

13.161 The policy is consistent with Paragraph 8 of the NPPW as it seeks to ensure that when determining applications for non-waste development the likely impact of proposed non-waste related development on existing waste management facilities is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.

WWE9 Open Waste Facilities

13.162 Open waste management facilities are those that deal with waste in the open air. These operations also include aggregate recycling facilities and open window composting. These facilities can give rise to specific impacts such as noise, dust and odour which can influence where such development can take place. The purpose of Policy WWE9: Open Waste Facilities is to set out where and how such development can take place.

WWE9 Open Waste Facilities

1. Development for new open waste management facilities will be permitted where:
 - i. the waste site allocations and existing waste facilities are shown to be unsuitable and/or unavailable for the proposed development;
 - ii. a need for the capacity of the proposed development has been demonstrated to manage waste arising from within the administrative area of Sunderland; and
 - iii. it is demonstrated that the site is at least as suitable for such development as Site Allocations, with reference to the overall spatial strategy and site assessment methodology associated with the Development Plan.
2. Where acceptable, proposals should be located at or on:
 - i. redundant farm land (in the case of green waste and/or biological waste); or
 - ii. demolition and construction sites, where the inert waste materials are to be used on the construction project on that site; or
 - iii. existing permitted waste management sites or co-located with other waste management development; or
 - iv. the curtilages of Waste Water Treatment Works (in the case of biological waste); or
 - v. mineral and landfill sites where waste material is used in conjunction with restoration or proposed waste operations are temporary and linked to the completion of the mineral/landfill operation; or
 - vi. areas of previously developed land; or
 - vii. employment areas that are existing or allocated in the Development Plan for general industry (B2) and storage and distribution (B8), with the exception of Primary Employment Areas, the Port of Sunderland or the IAMP, where waste development will not be supported.
3. Any proposals that come forward on land use types not identified above will be assessed on their merits, based on the other policies in the Development Plan. Such locations will be considered less favourably than those set out within this Policy.

Positively Prepared

Vision and Strategic Priorities

13.163 The policy will assist the delivery of the spatial vision by managing waste as a resource and minimising the amount produced and sent to landfill.

13.164 Policy WWE9 will help to deliver Strategic Priorities 2 and 10.

Draft Plan Comments

13.165 As set out in the Consultation Statement (SD07), no issues were raised during the draft Plan consultation.

How Issues Have Been Taken into Account at Publication Draft

13.166 As set out in the Consultation Statement (SD07), no issues were raised during the draft Plan consultation.

Publication Draft Comments

13.167 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Thompsons of Prudhoe concerned that the policy fails to acknowledge push by Government to recycle more (PD193).

How Issues Have Been Taken into account prior to Submission

13.168 The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. In response to Thompsons of Prudhoe, the Plan already seeks to push the management of waste up the waste hierarchy.

Duty to Cooperate (SD11)

13.169 No duty to cooperate issues identified against this policy.

Sustainability Appraisal (2017)

13.170 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?	?			?									

13.171 The SA made the following recommendation for changes to be made to the Draft Plan. No changes proposed.

Sustainability Appraisal (2018) (SD5)

13.172 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	~	~	+	0	~	+	++	++	++	+	~	++	++

13.173 The SA made no recommendations for changes to be made to the publication draft.

Justified

13.174 Open waste management facilities are those that deal with waste in the open air. Open waste operations also include aggregate recycling facilities and open window composting.

Open waste facilities can give rise to specific impacts such as noise, dust and odour which can influence where such development should take place. Therefore careful consideration needs to be taken when dealing with planning applications for such developments. Applicants will be expected to demonstrate the need for the facility and proposals should only be supported where existing waste management facilities are incapable of dealing with the proposed waste streams. Development should be focused on previously developed sites and those in previous compatible uses, as set out within the policy criteria.

13.175 Open waste facilities would not be appropriate within the Primary Employment Areas, at the Port of Sunderland or at the IAMP as these are important employment sites fundamental to the future success of the city, which are not considered to be compatible with open waste facilities. Applications which come forward on sites which do not fall within the criteria set out within the policy will be considered on their merits, taking into all other relevant policies contained within the plan. In such circumstances, the applicant will be required to submit a detailed justification as to why the facility could not be accommodated on a more appropriate site.

Reasonable Alternatives

13.176 The Council consider there are no reasonable alternatives

Effective

Deliverable

13.177 The policy will be delivered through the submission and determination of planning applications for open waste facilities. Where an open waste facility is proposed on a site which does not meet the criteria set out within the policy, the applicant will be required to submit a detailed justification as to why the facility could not be accommodated on a more appropriate site. If necessary, allocations for open waste facilities will be made through the Site Allocations and Designations Plan.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
WWE 9	Open waste facilities	Sets out the criteria that will be used to assess applications for open waste facilities	<ul style="list-style-type: none"> Significant increase in applications granted for open waste facilities Increase in number of open waste facilities granted in inappropriate locations 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under-delivery Review objectives of the policy in partnership with key external stakeholders, particularly waste operators Review evidence base with regard to waste 	<ul style="list-style-type: none"> New open waste management facilities permitted/developed Planning applications for open waste facilities granted in inappropriate locations 	<ul style="list-style-type: none"> SCC monitoring data South Tyne & Wear Waste Management Partnership (STWMP) Planning applications Waste operators

- management
- Potential review of the Policy/Plan

Consistent with National Policy

13.178 The policy would be consistent with Paragraph 4 of the NPPW as it seeks to identify sites and/or areas in which open waste facilities would be appropriate. In addition, it gives priority to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.

WWE10 Energy from Waste

13.179 Energy from waste developments has the potential to have significant adverse impacts upon the environment, public health as well as public amenity if not direct to appropriate locations. Policy WWE10: Energy from Waste sets out criteria to manage the development of these facilities.

WWE10 Energy from Waste

1. Energy from waste development, together with any ancillary buildings and infrastructure must demonstrate that they will have no unacceptable significant adverse impacts that cannot be mitigated for, particularly with regard to the protection of the environment, public health and public amenity.
2. Energy from Waste development will be required to provide combined heat and power unless it can be demonstrated that this would prevent the development of waste management facilities that have the potential to deliver important waste infrastructure.

Positively Prepared

Vision and Strategic Priorities

13.180 The policy will assist the delivery of the vision by managing waste as a resource and minimising the amount produced and sent to landfill.

13.181 Policy WWE10 will help to deliver Strategic Priorities 3, 9 and 10.

Draft Plan Comments

13.182 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Historic England supports the policy.
- Residents strongly opposed the policy as they considered the Plan allocated a site for an energy from waste facility at Washington.

How Issues Have Been Taken into Account at Publication Draft

13.183 The Plan does not identify any need or specific locations for an energy from waste facility as any required allocations will be made through the emerging Allocations and Designations Plan. However, the policy will be used to assess any applications for this type of development in Sunderland in advance of any allocations being made, where necessary. No changes were considered necessary to address the issues raised.

Publication Draft Comments

13.184 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- A resident objected to the policy on the grounds that the proposed Renewable Energy Centre in Washington conflicts with Policy WWE10 (PD8206).

How Issues Have Been Taken into account prior to Submission

13.185 The Council has taken into consideration the representation and are not proposing to make any modifications to this policy. The comment relates to a planning application, rather than the policies of the Plan.

Duty to Cooperate (SD11)

13.186 No duty to cooperate issues have been identified against this policy.

Sustainability Appraisal (2017)

13.187 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
?		?			?	?	?	?	?	?	?			

13.188 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	In the next iteration of the emerging Sunderland CSDP, policy tests within policies CM2 and CM3 regarding the avoidance of adverse or unmitigated significant adverse impacts should be harmonised. To ensure the policies adequately protect environmental and amenity interests whilst not unnecessarily restricting decentralised, renewable and low carbon energy development, consideration should be given to amending the policy tests to instead require the avoidance of unacceptable significant adverse impacts.	Both policies now refer to the avoidance of "unacceptable significant adverse impacts".
SA11: Air	In the next iteration of the emerging Sunderland CSDP, policy tests within policies CM2 and CM3 regarding the avoidance of adverse or significant adverse impacts should be harmonised. To ensure the policies adequately protect environmental and amenity interests whilst not unnecessarily restricting decentralised, renewable and low carbon energy development, consideration should be given to amending the policy tests to instead require the avoidance of unacceptable significant adverse impacts.	Air quality has been added to the equivalent policy and monitoring will be picked up through the Monitoring Framework.
SA12: Climate Change	To address identified inconsistencies, in the next iteration of the emerging Sunderland CSDP the policy tests within policies CM2 and CM3 regarding the avoidance of adverse or unmitigated significant adverse impacts should be harmonised. To ensure these policies adequately protect environmental and amenity interests whilst providing an appropriately supportive policy framework for decentralised, renewable and low carbon energy development in pursuit of this SA objective, consideration should be given to amending the policy tests to instead require the avoidance of unacceptable significant adverse impacts.	Both policies now refer to the avoidance of "unacceptable significant adverse impacts".

Sustainability Appraisal (2018) (SD5)

13.189 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
++	~	++	~	~	+	+	~	++	++	++	++	~	++	++

13.190 The SA made the following recommendation for changes to be made to the publication draft. Where changes were made as a result of these recommendations, this is outlined in the table below:

Recommendation	SCC Response
Within Policy WWE1, criterion 1(i) and 1(ii) should be amended to require the avoidance of "unacceptable" significant adverse impacts, taking account of any proposed mitigation or compensatory measures and the predicted benefits of the proposal. These criteria should also make clear that mitigation should be proposed to avoid all likely significant adverse impacts wherever possible. Similarly, criterion 1 within Policy WWE10 should be amended to require the avoidance of "unacceptable" significant adverse impacts.	Criterion i and ii amended to say 'unacceptable' significant adverse impacts.

Justified

13.191 The Council recognises that energy from waste developments can provide benefits when compared to other less sustainable forms of waste management, such as landfill. In accordance with the national requirement to manage waste higher up the waste hierarchy, it is therefore considered necessary to have specific policy coverage for energy from waste facilities.

13.192 However, the Council also recognises that energy from waste developments have the potential to have significant adverse impacts upon the environment, public health and/or public amenity, if not directed to appropriate locations. The policy therefore requires the applicant to demonstrate that proposals for energy from waste developments would not have unacceptable significant adverse impacts. Energy from waste developments have the opportunity to provide combined heat and power to other nearby users, thus reducing the need to generate heat from other sources that could contribute to climate change. The policy therefore requires the applicant to fully demonstrate that they have examined the opportunities for combined heat and power as part of any proposals.

Reasonable Alternatives

13.193 The Council consider there are no reasonable alternatives

Effective

Deliverable

13.194 The policy will be delivered through the submission and determination of planning applications for energy from waste developments. Applicants will be expected to provide a justification as part of any planning application, where they do not propose to generate and distribute combined heat and power as part of any proposals.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
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WWE10	Energy from waste	Sets out the criteria that will be used to assess applications for energy from waste developments	<ul style="list-style-type: none"> • Significant number of applications approved without appropriate mitigation • Significant number of applications for waste development which do not provide heat and power. 	<ul style="list-style-type: none"> • Identify reasons for lack of implementation • Potential review of the Policy/Plan 	<ul style="list-style-type: none"> • Number of energy from waste schemes permitted • Amount of facilities that produce heat and power 	<ul style="list-style-type: none"> • SCC monitoring data • Planning applications • South Tyne & Wear Waste Management Partnership (STWWMP) and regional waste disposal authority data.
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Consistent with National Policy

13.195 The policy is consistent with Paragraph 3 and 4 of the NPPW which seek to manage waste at higher levels within the waste hierarchy and ensure that where a low carbon energy recovery facility is considered an appropriate type of development, that waste planning authorities consider the suitable siting of such facilities to enable the utilisation of the heat produced as an energy source in close proximity to suitable potential heat customers. The policy is also consistent with Paragraph 120 of the NPPF which seeks to prevent unacceptable risks from pollution.

14.Sustainable Transport

Policy SP10: Connectivity and Transport Network

- 14.1 This policy sets out a number of highways schemes, sustainable transport routes/networks and safeguarded rail alignments that the Council wishes to improve, extend or deliver in the plan period to encourage a modal shift to more sustainable transport modes.

SP10 Connectivity and Transport Network

To improve connectivity and enhance the city's transport network, the council, working with its partners and utilising developer contributions will seek to:

1. deliver the following new highways schemes and initiatives:
 - i. Sunderland Strategic Transport Corridor (remaining phases);
 - ii. Ryhope to Doxford Park Link Road;
 - iii. Central Route section of Coalfield Regeneration Route; and
 - iv. Improvements to key junctions on the A19, including providing access to the IAMP;
2. improve the following transport routes and bus corridors to encourage walking and cycling and to reduce congestion:
 - i. A183 Chester Road;
 - ii. A690 Durham Road;
 - iii. A1231 Sunderland Highway (west of the A19);
 - iv. A1018 Newcastle Road;
 - v. B1522 Ryhope Road;
 - vi. Washington Road/North Hylton Road (east of A19); and
 - vii. A182 Houghton/Hetton Road.
3. improve the operating conditions for buses, in particular through securing improvements to the major bus corridors identified above; and exploring park and ride opportunities;
4. support improvements to the Metro and rail network including new stations and routes where deliverable;
5. safeguard the following disused railway alignments for future use:
 - i) Leamside line; and
 - ii) South Hylton to Penshaw;
6. improve and extend the cycle network.

Positively Prepared

Vision and Strategic Priorities

- 14.2 The policy will deliver the spatial vision by helping to provide excellent transport links across the city area, supporting new highway schemes, improving existing transport routes, bus corridors, walking and cycling routes and Metro and rail networks across the city area, with the aim of improving connectivity and encouraging modes of sustainable transport use.

- 14.3 Policy SP10 will help to deliver Strategic Priorities 3 and 11.

Draft Plan Comments

- 14.4 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;
- Residents objected to the proposed road through Elba Park. Residents requested more buses in Washington, they also requested that the Metro is extended. A resident supported the expansion to the cycle network. Other residents were concerned about the impact development will have on Houghton.
 - Gateshead, Newcastle and South Tyneside request additional modelling is undertaken to understand the impacts in Neighbouring Authorities.
 - Developers, Gateshead and Highways England support the policy.

- Residents object to the inclusion of the Central Route (from Elba Park) in the Policy. Residents welcome Metro extensions and would like to see the Plan make reference to the extension to Seaham. One resident supported the policy.
- Residents would like improvement made to the network at Hetton to address the impacts of development.
- Bellway's suggested an alternative alignment of the Ryhope Doxford Link road to prevent the serialisation of land.
- Durham County Council supports the re-opening of the Leamside Line and requests further discussions to determine the impacts of the SSGA.
- Town End Farm Partnership oppose all infrastructure identified in the IAMP.
- Highways England supports the policy but require the Council to undertake further work to assess the impacts on the SRN.
- Developments including Taylor Wimpey suggested that land safeguarded for the Leamside Line should be a minimum.
- Siglion supports Sunderland Strategic Transport Corridor.
- South Tyneside Council raised concern over the deliverability of South Hylton to Penshaw alignment.

How Issues Have Been Taken into Account

- The Central Route in the Coalfield will link the A182 at Biddick Woods via Sedgeleth and Dubmire South to Rainton Bridge Industrial Estate. It was included in the adopted 1998 UDP and has outline planning permission. 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. Careful design will be required to minimise the impact to Elba Park and severance of walking and cycle routes.
- Policy SP10 supports improvements to the Metro network where these are deliverable.
- The Council has updated the Transport Assessment and will continue to work with neighbouring authorities to understand the impacts each Plan will have on the Local Road Network.
- The Central Route in the Coalfield will link the A182 at Biddick Woods via Sedgeleth and Dubmire South to Rainton Bridge Industrial Estate. It was included in the adopted 1998 UDP and has outline planning permission. 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. Careful design will be required to minimise the impact to Elba Park and severance of walking and cycle routes.
- The Council has prepared a detailed Transport Assessment which considers the potential impacts of development on the transport network. Where necessary, appropriate mitigation has been identified within the Infrastructure Delivery Plan to address the impacts of the Plan.
- Policy SP10 supports improvements to the Metro network where these are deliverable.
- The Council has updated the Transport Assessment and will continue to work with neighbouring authorities to understand the impacts each Plan will have on the Local Road Network.
- In regards to IAMP, all necessary infrastructure is identified in the adopted IAMP AAP.
- The South Hylton to Penshaw alignment has been included within the IDP as an aspirational scheme.
- The alignment of the Doxford-Ryhope link road shown on the Policies Map is indicative at this stage and is subject to detailed design.
- The alignment of the Leamside line is shown on the Policies Map. No specific buffer has been identified; however the policy seeks to ensure that any development would not be incompatible with the rail line coming back into use.

Publication Draft Plan Comments

Issues Raised

- 14.5 The following main issues were identified by representations to the Sustainable Transport Chapter:
- South Tyneside Council (PD4451) welcomes policies within Chapter 12 and will continue to work with Sunderland in regards to development planning and traffic modelling.
 - The Minerals Products Association (PD4433) identify that no indication is given of the likely resource requirements to deliver the infrastructure planned in the CSDP.
 - One resident (PD8500) claims that the CSDP consultation was inadequate and cites a lack of basic facilities at Sebaurn; bus services no longer using Park Lane Interchange; and traffic calming measures along the seafront as reasons for making representation.
- 14.6 The following main issues were identified by representations to Policy SP10:
- A significant number of residents made representation to policy SP10 on the grounds that the identification of a road through Elba Park (Central Route) would:
 - split the Green Flag Park into two;
 - reroute traffic through existing neighbourhoods;
 - adversely affect wildlife of which there are protected species and habitats;
 - impact walking and cycling routes;
 - reduce recreation/exercise areas;
 - lead to more traffic congestion;
 - increase levels of pollution;
 - result in loss of greenspace which contributes to general wellbeing;
 - impact on the quality of life of local residents (increased noise and speeding traffic);
 - increase traffic on the A19 and A1; and
 - Residents suggested an alternative alignment be explored alongside the Leamside Line away from existing residential development.
 - Bellway Homes generally support policy SP10 and the Doxford-Ryhope link road but would like the alignment to be altered so that it does not impact their land interest. Burdon Lane Consortium support policy SP10 and the delivery of the Ryhope to Doxford Park Link Road.
 - Durham County Council welcomes the safeguarding of the Leamside Line in Sunderland which complements the safeguarding of this line through the emerging County Durham Plan.
 - Harworth Estates supports the 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. One resident welcomes the Council's support for the expansion of the Metro system.
 - CPRE North East suggests the policy should outline how the Leamside Line could be re-used in future. The policy could also set out how the Durham Coast line could be improved and provide more detail on how provisions for walking and cycling can be improved.
 - Highways England suggested further modelling work is needed on the Strategic Road Network.

How Issues Have Been Taken into Account Prior to Submission

- 14.7 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by the Minerals Product Association (PD4433), the Council does not feel it necessary to make any

modifications. The Maintaining Levels of Minerals Supply Topic Paper and Local Aggregates Assessment 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.

14.8 In response to the representations raised by a resident the Council does not feel it necessary to make any modifications. The CSDP public engagement strategy was in accordance with the Council’s statutory requirement as Local Planning Authority. The process is outlined in the CSDP Consultation Statement (2018 (SD.7⁴⁹²)).

14.9 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by a number of residents, the Council does not feel it necessary to make any modifications as 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. The planning permission includes mitigation through the creation of biodiversity ponds and scapes, as well as road crossings that will help to minimise severance within the Park in terms of wildlife and recreational movements.

Proposed Modifications to the Publication Draft

Policy/ Para/ Figure	Proposed Change	Justification
12.6	Key junctions on the A19 at Downhill, Ferryboat and A690 including.	Typographical error

Duty to Cooperate (SD11⁴⁹³)

14.10 Throughout the development of the Plan, the Council has actively engaged and participated in discussions with transport authorities and local authorities regarding transport issues that impact the north east region and Sunderland specifically.

Sustainability Appraisal (2017) (SD12⁴⁹⁴)

14.11 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

14.12 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

⁴⁹² [https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_\(2018\).pdf?m=636807351626400000](https://www.sunderland.gov.uk/media/20989/SD-7-CSDP-Consultation-Statement-2018-/pdf/SD.7_CSDP_Consultation_Statement_(2018).pdf?m=636807351626400000)

⁴⁹³ [https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Co-operate_Statement_\(2018\).pdf?m=636808429133300000](https://www.sunderland.gov.uk/media/21027/SD-11-Core-Strategy-and-Development-Plan-Publication-Duty-to-Co-operate-Statement-December-2018-/pdf/SD.11_CSDP_Publication_-_Duty_to_Co-operate_Statement_(2018).pdf?m=636808429133300000)

⁴⁹⁴ [https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_\(2017\).pdf?m=636808430066670000](https://www.sunderland.gov.uk/media/21028/SD-12-Sunderland-Draft-CSDP-Sustainability-Appraisal-Incorporating-SEA-2017-/pdf/SD.12_Sunderland_Draft_CSDP_Sustainability_Appraisal_Incorporating_SEA_(2017).pdf?m=636808430066670000)

SA Objective	Recommendation	SCC Response
SA1: Biodiversity and Geodiversity	To address the identified deficiency regarding consideration of environmental impacts associated with the transport infrastructure projects supported by policy CC2 – Connectivity, it is recommended that this policy should be expanded to reference the need for these projects to accord with other relevant planning policies and to demonstrate that they would not give rise to any unacceptable environmental or amenity impacts.	The Plan should be read as a whole and adverse impacts relating to the environment and amenity would be considered as part of other policy considerations.

Sustainability Appraisal (2018) (SD5)

14.13 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
-	+	+	+	~	++	++	~	~	-	++	++	~	-	~

14.14 The SA made no recommendations for changes to be made to the Publication Draft.

Regional Transport Co-operation

14.15 At a regional level, the transport governance arrangements in the areas covered by County Durham, Northumberland, Gateshead, Newcastle, North Tyneside, South Tyneside and Sunderland Councils are distinct and are set out in the Newcastle Upon Tyne, North Tyneside and Northumberland Combined Authority (Establishment and Functions) Order 2018 (the Order)⁴⁹⁵. This Order provided for the arrangements for splitting the North East Combined Authority (NECA) into separate Combined Authorities, a Mayoral Combined Authority to the north of the Tyne (NTCA) and the remainder of NECA to the south.

14.16 Each of the two Combined Authorities are statutory Transport Authorities in their own right meaning they have responsibility for strategic transport planning including to prepare a statutory Transport Plan. However, the former Tyne and Wear Authorities – two in NTCA and three in NECA are also covered by a Passenger Transport Executive (Nexus) under the 1968 Transport Act (Figure 61). This arrangement can only be altered or dissolved through primary legislation.

⁴⁹⁵ http://www.legislation.gov.uk/ukdsi/2018/9780111171875/pdfs/ukdsi_9780111171875_en.pdf

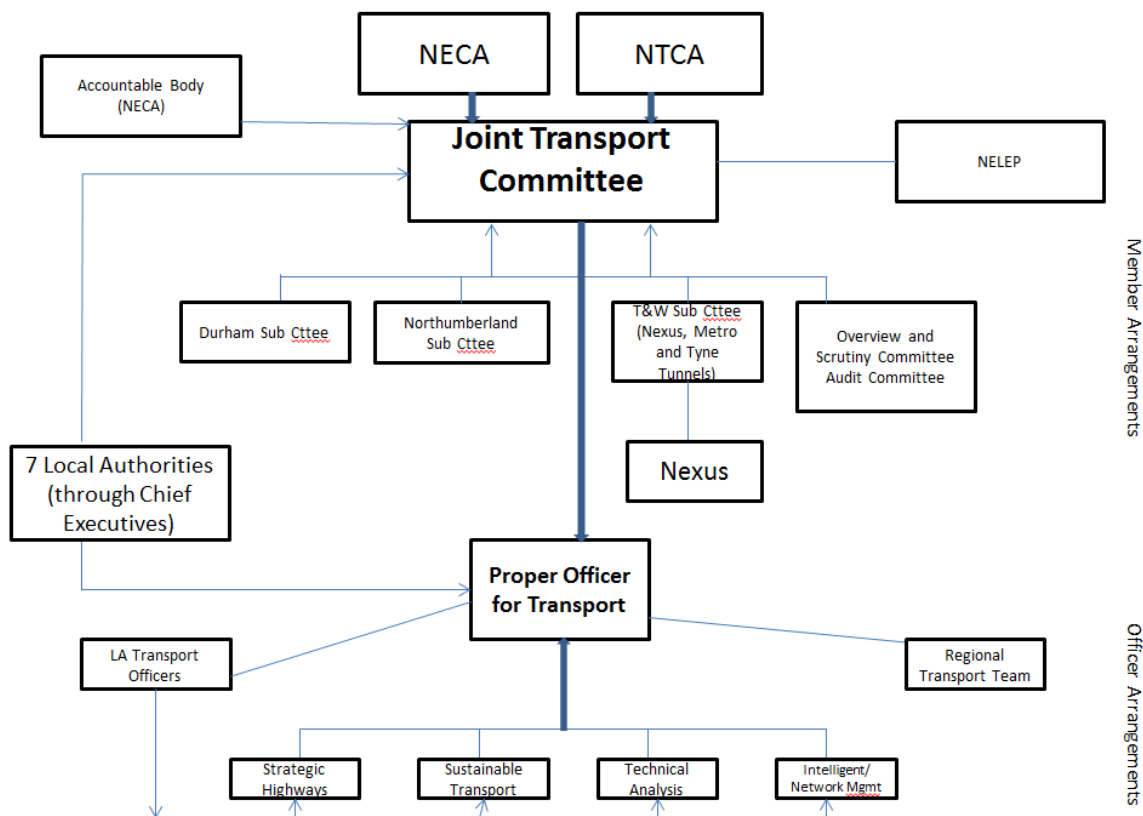


Figure 61 North East Joint Transport Committee: Organogram

14.17 In order to overcome this, the two Combined Authorities administer transport through a North East Joint Transport Committee (NEJTC) comprising the Leaders of the seven constituent local authorities. Responsibility for passenger transport in Tyne and Wear is delegated to the Tyne and Wear Sub-Committee whose responsibilities cover Nexus, Metro performance and the Tyne Tunnels. Responsibility for passenger transport in Durham and Northumberland is delegated back to those two individual authorities. Most of the Member level meetings have taken place and will continue to take place on a bi-monthly basis.

14.18 Officer support for these arrangements are led by the seven Chief Executives who themselves are supported by various officer groupings headed by the Heads of Transport group with a number of specialist sub groups made up of officers from the seven authorities and Nexus. Provision has been made for the appointment in due course of a 'Proper Officer for Transport' whose role will be to champion transport in the region and to manage the Regional Transport Team on a day to day basis. All of the officer groupings have taken place and will continue to take place on a monthly basis.

14.19 Whilst there have been regular Member, Heads of Transport and officer groupings meetings to discuss strategic transport issues at a regional level, there has also been ongoing meetings at a local level between individual local authorities and statutory bodies to discuss specific transport issues that impact Sunderland directly and its neighbouring authorities. Of particular importance to the Duty to Cooperate are those discussions regarding the strategic and local road networks and the Leamside Line.

Strategic and Local Road Networks

- 14.20 The Council and Highways England have held regular meetings throughout the preparation of the Plan to ensure that impacts upon then SRN are identified and can be adequately mitigated. Highways England made representations to the Plan at Publication Draft stage objecting to the Plan and citing the requirement for further modelling work to be undertaken on the Strategic Road Network (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850).
- 14.21 Following representations submitted by Highways England, 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.

Leamside Line

- 14.22 The reintroduction of the Leamside Line has the potential to benefit Sunderland directly by providing access to the East Coast Mainline (ECML) for freight and passenger services. It also has the potential to connect Washington to the Metro system through the creation of a Wearside loop. This would undoubtedly bring economic benefits to Sunderland by opening up business channels through freight services and providing enhanced access and footfall to the city for residents and visitors, however it would rely on neighbouring authorities supporting the reopening of the line within their respective areas.
- 14.23 The Council has discussed the opportunities that the Leamside Line would offer to both Sunderland and its neighbouring local authorities, with all agreeing that it would provide benefits to their respective areas.
- 14.24 Durham County Council made representations (PD1395) to the Publication Draft Plan welcoming the safeguarding of the Leamside Line as it complements their proposals to safeguard of the line through the emerging County Durham Plan⁴⁹⁶.
- 14.25 Gateshead Council also supports the reopening of the Leamside Line within their respective Plan. The Gateshead Core Strategy⁴⁹⁷ supports the reintroduction of the line to achieve benefits of cross boundary sustainable travel, improving connectivity with Newcastle and further afield to the north and south of the region.
- 14.26 The Council will continue to work with Durham, Gateshead and South Tyneside regarding the Leamside Line through the Duty to Cooperate to ensure emerging Plans South of Tyne complement each other

Ongoing Co-operation

- 14.27 The Council is aware that neighbouring planning authorities including South Tyneside, Durham and Gateshead have all expressed the need for further dialogue regarding the potential impacts of development proposed within the Plan on their respective transport networks. The Council will continue dialogue with neighbouring authorities through the Duty to Cooperate to discuss and resolve matters that arise.

⁴⁹⁶ [Durham Local Plan Preferred Options \(paras 5.194 and 5.195\)](#)

⁴⁹⁷ [Planning for the Future: Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne 2010-2030 \(March 2015\)](#)
Policies CS13, KEA2

Justified

- 14.28 The NPPF makes clear that transport policies play an important part in facilitating sustainable development and should make provision for transport systems balanced in favour of sustainable modes of transport⁴⁹⁸. Policy SP10 seeks to achieve this balance, supporting new highway schemes, improving existing transport routes, bus corridors, walking and cycling routes and Metro and rail networks across the Plan area, with the aim of improving connectivity and encouraging modes of sustainable transport use.
- 14.29 In the context of the Plan, new development can have an impact upon the transport network by increasing the number of trips. It is therefore important that development is directed to the most sustainable locations which are accessible by a wide range of transport options, including public transport and that improvement to the transport network is made where necessary to facilitate this.
- 14.30 In order to understand the potential impact of development proposals within the Plan on key junctions on the road network, an Assessment of Transport Impacts Report was prepared in 2017 (SD51), which modelled the impact of all employment sites and Housing Growth Areas proposed for allocation through the plan and the sites identified as deliverable and developable over the plan period within the Strategic Housing Land Availability Assessment (SHLAA) (SD22⁴⁹⁹). The original Assessment of Transport Impacts Report undertaken in 2017 (SD51) was updated through the Assessment of Transport Impacts Report Addendum 1 (2018) (SD52), which modelled the revised sites within the updated Plan and the draft 2018 SHLAA (SD22a-e). An additional Addendum (Assessment of Transport Impacts Report 2) (SD53⁵⁰⁰) was also prepared to model how the impacts of the plan would be mitigated by schemes which are anticipated to be delivered during the plan period. This included the schemes identified within the policy and other schemes identified as being essential infrastructure in the Infrastructure Delivery Plan (IDP⁵⁰¹) (SD59).
- 14.31 To take account of the impacts identified on the road network, a number of key improvements were identified which are included within Policy SP10;
1. Sunderland Strategic Transport Corridor (remaining phases 3-5)
 2. Ryhope to Doxford Link Road;
 3. Central Route section of Coalfield Regeneration Route; and
 4. Improvements to key junctions on the A19, including providing access to the IAMP.

Sunderland Strategic Transport Corridor

- 14.32 The Sunderland Strategic Transport Corridor (SSTC) has long been identified as a strategic transport aspiration for the Council. The premise of the SSTC route is to improve accessibility to the Urban Core, the Port of Sunderland, the Enterprise Zones, Nissan, IAMP and the University. It will also assist to unlock the regeneration potential of development sites south of the Wear at Pallion, Deptford and Groves, which were identified as being remote from the existing highways network, the A19 and unlikely to meet their full development potential without intervention (Figure 62).

⁴⁹⁸ NPPF (2012) paragraph 29

⁴⁹⁹ [Strategic Housing Land Availability Assessment \(2018\)](#)

⁵⁰⁰ [https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_\(2018\).pdf?m=636803107219430000](https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_(2018).pdf?m=636803107219430000)

⁵⁰¹ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

- 14.33 The whole SSTC route intends to achieve this link by, improving the junctions between the A19 and the Port; providing a new high quality dual carriageway route; constructing a landmark bridge; and providing a continuous cycleways/footways and bus facilities, resulting in a more efficient and direct approach to the A19, the Urban Core, the Port, the Enterprise Zone and promoting a sustainable modal shift to sustainable transportation.
- 14.34 The need for a transport corridor was first identified in the Unitary Development Plan. The UDP identified and safeguarded a road alignment which was subject to an Examination in Public and adopted in September 1998. The UDP SSTC road alignment subsequently succumbed to a route alteration at the Wear crossing point (SP55)⁵⁰². This change occurred in order to realise the regeneration benefits of riverside sites south of the Wear to unlock their development potential. Benefits such as this could not be achieved without a route alteration as access to the sites was otherwise poor. The amended SSTC route was later supported in Tyne & Wear Local Transport Plan 3 2011-2021 (T&WLTP3) (SD53)⁵⁰³.
- 14.35 To date, the Council has successfully delivered phases 1 and 2 of the SSTC route which includes the realignment of St Mary's Way and construction of the Northern Spire Bridge, which opened in August 2018 (Figure 62). Three phases of the SSTC route remain outstanding. Phase 3 of the project was granted planning permission in October 2017 (17/00197/LP3) and will provide a new dual carriageway link from the south side of the bridge, through Pallion and Deptford to Beach Street and the Urban Core. The Council anticipates that work on the third phase of the SSTC will commence in 2019. The IDP (SD59)⁵⁰⁴ indicates that full funding is in place to deliver the Phase 3 of the route.
- 14.36 The final phases of the project involve improvements to Wessington Way to improve connectivity between the north side of the Northern Spire bridge and the A19 (phase 4), and a new access to the Port of Sunderland (phase 5). A strategic business case identifies the benefits and solutions that the remaining phases 4 and 5 will deliver (SP64)⁵⁰⁵. The North East Combined Authority (NECA) has submitted a bid to secure the funds to deliver phase 4. The outcome of this bid is expected in 2019.
- 14.37 The delivery of SSTC4 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 SSTC4, 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.
- 14.38 The NPPF is clear that local authorities should work with transport providers to develop strategies for viable infrastructure, to support sustainable development and where appropriate, support strategies for port growth⁵⁰⁶. Owing to the SSTCs links with the Port of Sunderland, the transport corridor seeks to address the connectivity of port uses with manufacturing businesses such as Nissan and the IAMP, which the Port could support.

⁵⁰² Refer to the UDP and Cabinet Report: Adoption of Preferred SSTC Route: 19 January 2005 (SP55)

⁵⁰³ Chapter 15.2.3, page 202 [https://www.sunderland.gov.uk/media/20953/SP-53-Keep-Tyne-and-Wear-Moving-LTP-The-Third-Local-Transport-Plan-for-Tyne-and-wear-2011-/pdf/SP.53.Keep_Tyne_and_Wear_Moving_-_LTP_The_Third_Local_Transport_Plan_for_Tyne_and_Wear_\(2011\).pdf?m=636803144846930000](https://www.sunderland.gov.uk/media/20953/SP-53-Keep-Tyne-and-Wear-Moving-LTP-The-Third-Local-Transport-Plan-for-Tyne-and-wear-2011-/pdf/SP.53.Keep_Tyne_and_Wear_Moving_-_LTP_The_Third_Local_Transport_Plan_for_Tyne_and_Wear_(2011).pdf?m=636803144846930000)

⁵⁰⁴ Page 88, scheme 1

⁵⁰⁵ Draft Sunderland Strategic Transport Corridor Commercial Links: Strategic Case: Outline Business Case 21 July 2016.

[https://www.sunderland.gov.uk/media/21030/SP-64-Draft-SSTC-Commercial-Links-Strategic-Case-2016-/pdf/SP.64.Draft_SSTC_Commercial_Links_Strategic_Case_\(2016\).pdf?m=636808438240130000](https://www.sunderland.gov.uk/media/21030/SP-64-Draft-SSTC-Commercial-Links-Strategic-Case-2016-/pdf/SP.64.Draft_SSTC_Commercial_Links_Strategic_Case_(2016).pdf?m=636808438240130000)

⁵⁰⁶ NPPF 2012 paragraph 33

The SSTC's potential to simultaneously unlock the development of key mixed use riverside sites would also serve to benefit Sunderland's riverside regeneration. For the above reasons, Policy SP10 seeks to support sustainable development within Sunderland, enhancing transport connectivity and permeability between manufacturing businesses, the Port and the Urban Core, fulfilling the requirements of the NPPF.

14.39 Due to the continued priority for the transport corridor and the regeneration benefits that will be realised through its completion, the SSTC route has been identified in the Plan's Policies Map (SD2) and its delivery will be supported through policy SP10 1i) of the Plan.

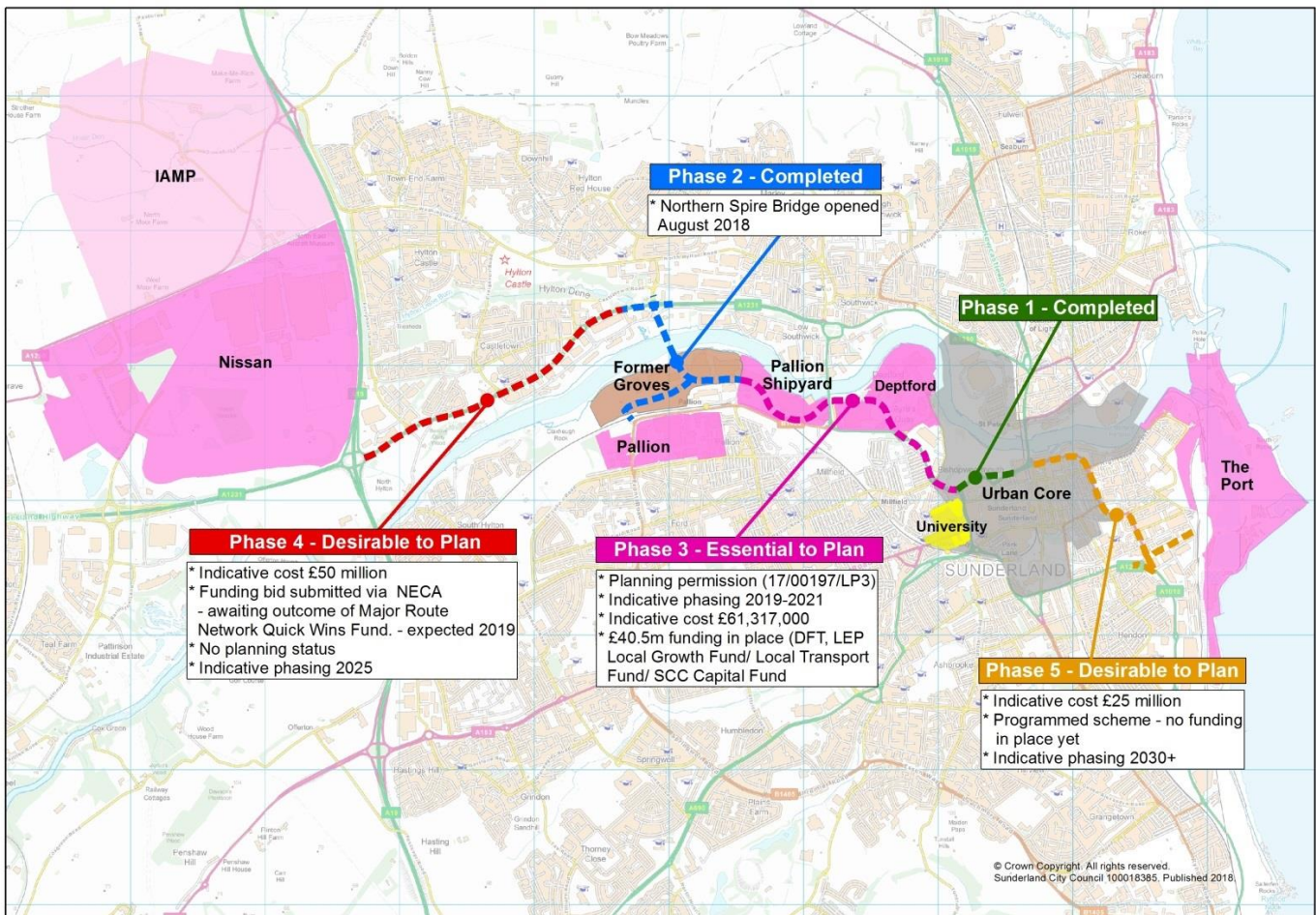


Figure 62 Sunderland Strategic Transport Corridor Phasing

Ryhope-Doxford Link Road

14.40 The Ryhope-Doxford link road has been identified through the South Sunderland Growth Area Infrastructure Delivery Study (SP24) as a critical piece of infrastructure to support the delivery of the South Sunderland Growth Area. The link road will provide strategic purpose, serving around 3000 new homes and a new community within the South Sunderland Growth Area (SSGA) and will provide access to assist in the SSGAs construction.

14.41 Jacobs were commissioned to update and expand the existing Sunderland Highway Improvement Model (SHIM)(SP27)⁵⁰⁷ in order to establish the transport infrastructure

⁵⁰⁷ Page 44 [https://www.sunderland.gov.uk/media/20927/SP-27-SHM-Model-Testing-and-Appraisal-of-LDP-Sites-Including-SSGA-2014-pdf/SP.27_SHIM_Model_Testing_and_Appraisal_of_LPD_Sites_Including_SSGA_\(2014\).pdf?m=636803130350630000](https://www.sunderland.gov.uk/media/20927/SP-27-SHM-Model-Testing-and-Appraisal-of-LDP-Sites-Including-SSGA-2014-pdf/SP.27_SHIM_Model_Testing_and_Appraisal_of_LPD_Sites_Including_SSGA_(2014).pdf?m=636803130350630000)

requirements to enable development of the Sunderland South Growth Area (SSGA). This was intended to provide evidence on the prospective future impacts of SSGA on the local transport network and on the adjacent strategic and local roads and thus, help deliver the SSGA housing sites. The modelling work undertaken concluded that the proposed level of development at the SSGA could be accommodated and justified provided that the RDLR was completed in its entirety⁵⁰⁸. Policy SP10 therefore seeks to support completion of this link road as part of the proposals to deliver around 3000 houses and associated infrastructure in the SSGA.

RDLR Route

- 14.42 The link road designation has long been established in the Unitary Development Plan, which was subject to an Examination in Public and adopted in September 1998. The Ryhope Tunstall Periphery: Planning Guidance (RTPPG) (SP54⁵⁰⁹) supported the UDP, providing more detailed guidance regarding development within the area, including the potential for the road alignment. Through the UDP and the RTPPG, the link road designation has remained protected for over twenty years. Taking account of the evidence in the SHIM (SP27⁵¹⁰) and the SSGA IDS (SP24⁵¹¹) the link road designation remains significant to the delivery of the SSGA and therefore the designation has been transposed into the Plan's Policies Map to support delivery of SP10 ii) and the draft South Sunderland Growth Area Supplementary Planning Document (SSGA SPD) (SD36) (see Figure 63).
- 14.43 It is important to note that the RDLR and its precise alignment for the outstanding sections will be worked up by the Council in due course. The designation shown on the Plan's Policies Map (SD2⁵¹²) represents the indicative road alignment and has taken into account constraints such as, archaeology, topography, land ownership, suitable alternative natural green space (SANGS), road viability and Green Belt implications amongst many others.
- 14.44 The route of the RDLR is planned to run along the southern boundary of the built area of Tunstall and Ryhope, linking Ryhope to the A19 with Tunstall and Doxford Park. The road will link in with the Southern Radial Route to provide enhanced access to and from the city centre and Hendon and South Ryhope employment areas, avoiding the need to travel through the built up areas of Ryhope and Tunstall.
- 14.45 Part of the link road has been delivered, adjacent to Tunstall Bank, however the remaining sections of the link road are subject to funding from developments within the SSGA (Figure 63). The IDP (SD59)⁵¹³ details indicative costs attributed to the development of the link road and identify £4,965,900 will be secured from house builders in the SSGA, to deliver the link road. At present £2,151,100⁵¹⁴ has been secured through S106 contributions from both the Cherry Knowle and Chapelgarth planning permissions. A

⁵⁰⁸ Paragraph 6.3.3, page 30

⁵⁰⁹ [https://www.sunderland.gov.uk/media/20963/SP-54-Ryhope-Tunstall-Periphery-Planning-Guidance-1999-
/pdf/SP.54_Ryhope_Tunstall_Periphery_Planning_Guidance_\(1999\).pdf?m=636803823437270000](https://www.sunderland.gov.uk/media/20963/SP-54-Ryhope-Tunstall-Periphery-Planning-Guidance-1999-
/pdf/SP.54_Ryhope_Tunstall_Periphery_Planning_Guidance_(1999).pdf?m=636803823437270000)

⁵¹⁰ [https://www.sunderland.gov.uk/media/20927/SP-27-SHM-Model-Testing-and-Appraisal-of-LDP-Sites-Including-SSGA-2014-
/pdf/SP.27_SHIM_Model_Testing_and_Appraisal_of_LPD_Sites_Including_SSGA_\(2014\).pdf?m=636803130350630000](https://www.sunderland.gov.uk/media/20927/SP-27-SHM-Model-Testing-and-Appraisal-of-LDP-Sites-Including-SSGA-2014-
/pdf/SP.27_SHIM_Model_Testing_and_Appraisal_of_LPD_Sites_Including_SSGA_(2014).pdf?m=636803130350630000)

⁵¹¹ [https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-
/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_\(2016\).pdf?m=636803128597970000](https://www.sunderland.gov.uk/media/20924/SP-24-South-Sunderland-Growth-Area-Infrastructure-Delivery-Study-2016-
/pdf/SP.24_South_Sunderland_Growth_Area_-_Infrastructure_Delivery_Study_(2016).pdf?m=636803128597970000)

⁵¹² [https://www.sunderland.gov.uk/media/20850/SD-2-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft-Policies-
Map/pdf/SD.2_Core_Strategy_and_Development_Plan_2015-33_Publication_Draft_Policies_Map.pdf?m=636802910202830000](https://www.sunderland.gov.uk/media/20850/SD-2-Core-Strategy-and-Development-Plan-2015-33-Publication-Draft-Policies-
Map/pdf/SD.2_Core_Strategy_and_Development_Plan_2015-33_Publication_Draft_Policies_Map.pdf?m=636802910202830000)

⁵¹³ Page 104 [https://www.sunderland.gov.uk/media/20958/SP-59-Sunninside-Planning-and-Design-Framework-2008-
/pdf/SP.59_Sunninside_Planning_and_Design_Framework_\(2008\).pdf?m=636803148790430000](https://www.sunderland.gov.uk/media/20958/SP-59-Sunninside-Planning-and-Design-Framework-2008-
/pdf/SP.59_Sunninside_Planning_and_Design_Framework_(2008).pdf?m=636803148790430000)

⁵¹⁴ SCC S106 Database

further £825,291⁵¹⁵ of S106 monies has been secured for the construction of a footbridge over Burdon Lane to help enable and facilitate the development of the link road.

- 14.46 An application at land at South Ryhope⁵¹⁶ is approved subject to the signing of a S106 agreement, equal to £831,150 towards the RDLR. An outstanding balance of £1,983,650 would remain from the Land North of Burdon Lane scheme. There is sufficient scope and certainty that the outstanding balance can be secured through a S106 agreement to complete the link road.

⁵¹⁵ SCC S106 Database

⁵¹⁶ 16/01502/OU4

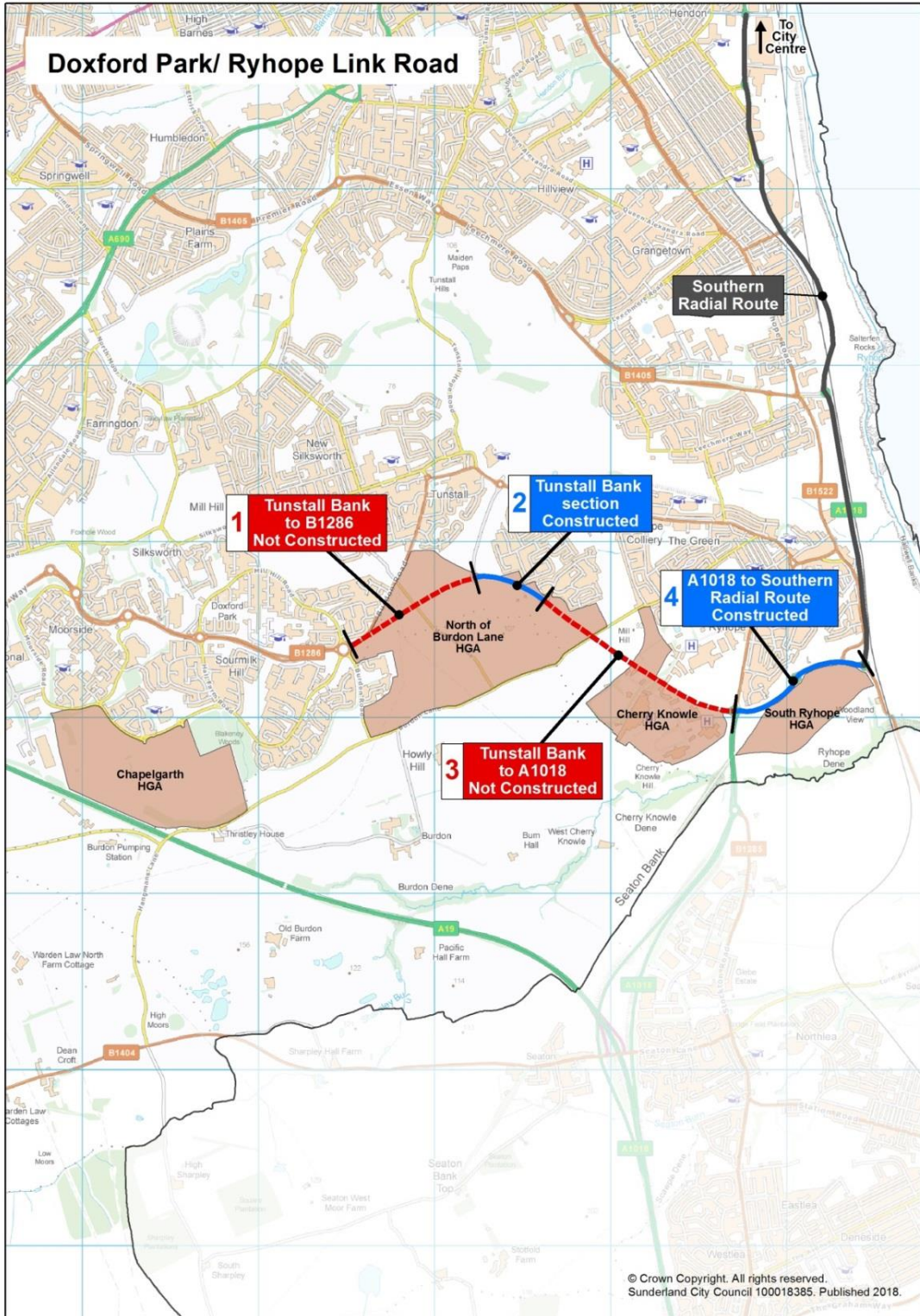


Figure 63 Doxford Ryhope Link Road

The Coalfield Regeneration Route (Central Route section)

14.47 The Coalfield Regeneration Route was first identified in the East Durham Coalfields Infrastructure Study which was completed in 1991 and was intended to identify new highway infrastructure for inclusion in the Unitary Development Plan (UDP) and to support development in the area (Figure 64).

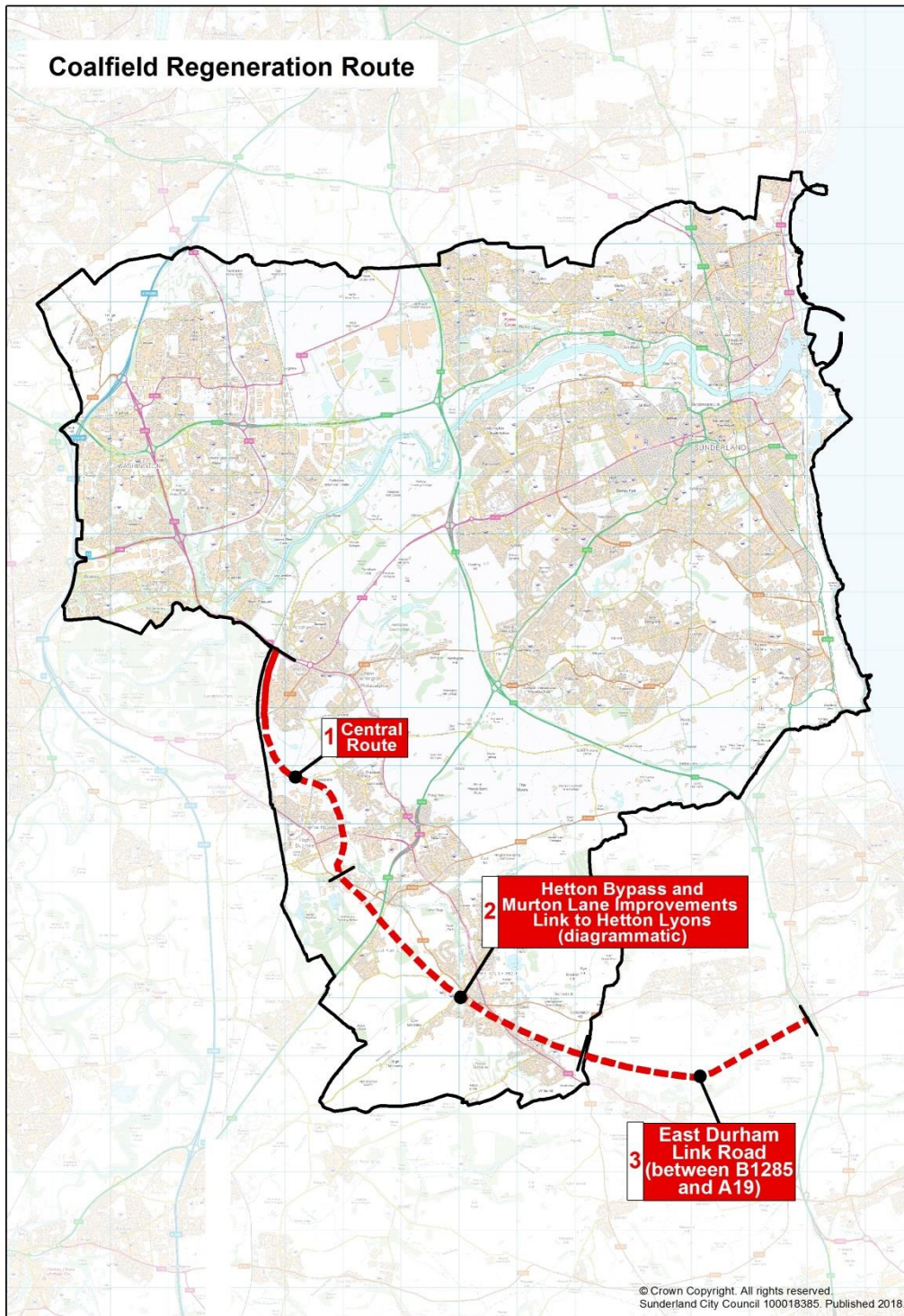


Figure 64 Coalfield Regeneration Route

14.48 The proposal for the Coalfield Regeneration Route was put forward on the basis of environmental grounds, due to the existing network (comprising the A182, A1052, B1284, B1285, B1286 and B1260) being closely fronted by residential properties along much of

their length. The bypass was subsequently included and adopted in the Unitary Development Plan.

- 14.49 Initial modelling of the Assessment of Transport Impacts (SD51)⁵¹⁷ did not highlight the need for major highway investment in the Coalfields area and concluded that the existing network could cope with the scale of development envisaged. However, the inclusion of additional residential sites in this area identified in the SHLAA (SD22a-e) meant that Capita was asked to undertake a further assessment which was presented as two addendum reports in May 2018 (SD52)⁵¹⁸. This highlighted a number of key junctions in the Coalfields that would be operating beyond their capacity if all the sites were developed. These included A182/B1284 and A182/Murton Lane in the Hetton and Easington Lane area. Other junctions in the vicinity that would operate beyond capacity include: A182/B1260 (Gillas Lane); A690/B1404; A1052 Britannia Terrace; and A182/B1286.
- 14.50 In the context of the Plan, the Coalfield Regeneration Route would assist to relieve these junctions of traffic as development is built out during the plan period. Whilst the route is not essential to the Plan's delivery, it is prudent to protect the principle of the alignment in order to support sites in this location at a later date.
- 14.51 The Coalfield Regeneration Route is split into three sections;
1. The A182 West of Shiney Row with the B1284 at Rainton Bridge, also known as the Central Route;
 2. Hetton Bypass and Murton Lane Improvements Link to Hetton Lyons; and
 3. East Durham Link between the B1285 and the A19 via Hawthorn employment site (bypassing Murton Village).
- 14.52 The above three sections of the Coalfield Regeneration Route will cost approximately £20 million pounds each to complete. The IDP (SD59) identifies all three sections as "desirable" schemes to deliver within the plan period⁵¹⁹. However, all three rely on external funding and S106 contributions for their delivery.
- 14.53 The Central Route section of the scheme (which would link the A182 at Biddick Woods via Sedgeleth and Dubmire South to Rainton Bridge Industrial Estate and the A690) is expected to be the sole section to be delivered within the plan period (Figure 65). At present, it is the only section of the Coalfield Regeneration Route to have planning consent (05/04691/LAP). As a result its alignment has been saved on the Plan's Policies Map. However, the remainder of the southern sections of the Coalfield Regeneration Route have the potential to come forward for development, subject to successful funding bids or developer contributions to secure their delivery and have been included within the IDP (SD59) as desirable schemes to support the Plan. The Central Route is therefore identified and supported in policy SP10 1iii) as a new highway initiative to support the level of development proposed in the Coalfield area, within the Plan.

⁵¹⁷ Assessment of Transport Impacts (2017) [https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁵¹⁸ Assessment of Transport Impacts – Addendum 1(2018) – Table 5, Pages 7-12. [https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-/pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_\(2018\).pdf?m=636803106569000000](https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-/pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_(2018).pdf?m=636803106569000000)

⁵¹⁹ Page 92, scheme ref 6. [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

Central Route Rationale

- 14.54 The original rationale for the Central Route was to remove as much through and heavy traffic as possible from existing roads, and to provide direct links from the major highways and strategic route network to all the industrial estates in the area, and also improve access to local communities. A concern at the time was that the existing highway network comprising the A182, A1052, B1284 and B1260 largely comprise roads that are closely fronted by residential property throughout the area. The Central Route was seen to benefit local communities through enhanced access, together with associated regeneration and new investment in the area. It would provide improved access to Dubmire and Sedgeleth industrial estates and to Rainton Bridge South and New Lambton, by the improvement of road links to the duelled A690 Durham Road to the south at Rainton Bridge and the A182 Washington Highway to the north.
- 14.55 Parts of the Central Route have been built using planning gain agreements (Figure 65). The northern section at Biddick Woods providing a link between the A182 and A183 being constructed was part of the housing development to the west of Shiney Row, and funded by developer contributions. To the south of Lambton Cokeworks, the Dubmire section of the Route between Dairy Lane and Dubmire Industrial Estate was built in the early 2000s, also funded through developer contributions. A further section of the Route at Rainton Bridge was constructed some years ago to access the industrial area.
- 14.56 The outstanding sections of the Central Route to be built are (Figure 65):
- Elba Park South (Section 3);
 - Sedgeleth and Dubmire Industrial Estate (Section 4); and
 - Dairy Lane to B1284 (Section 6)

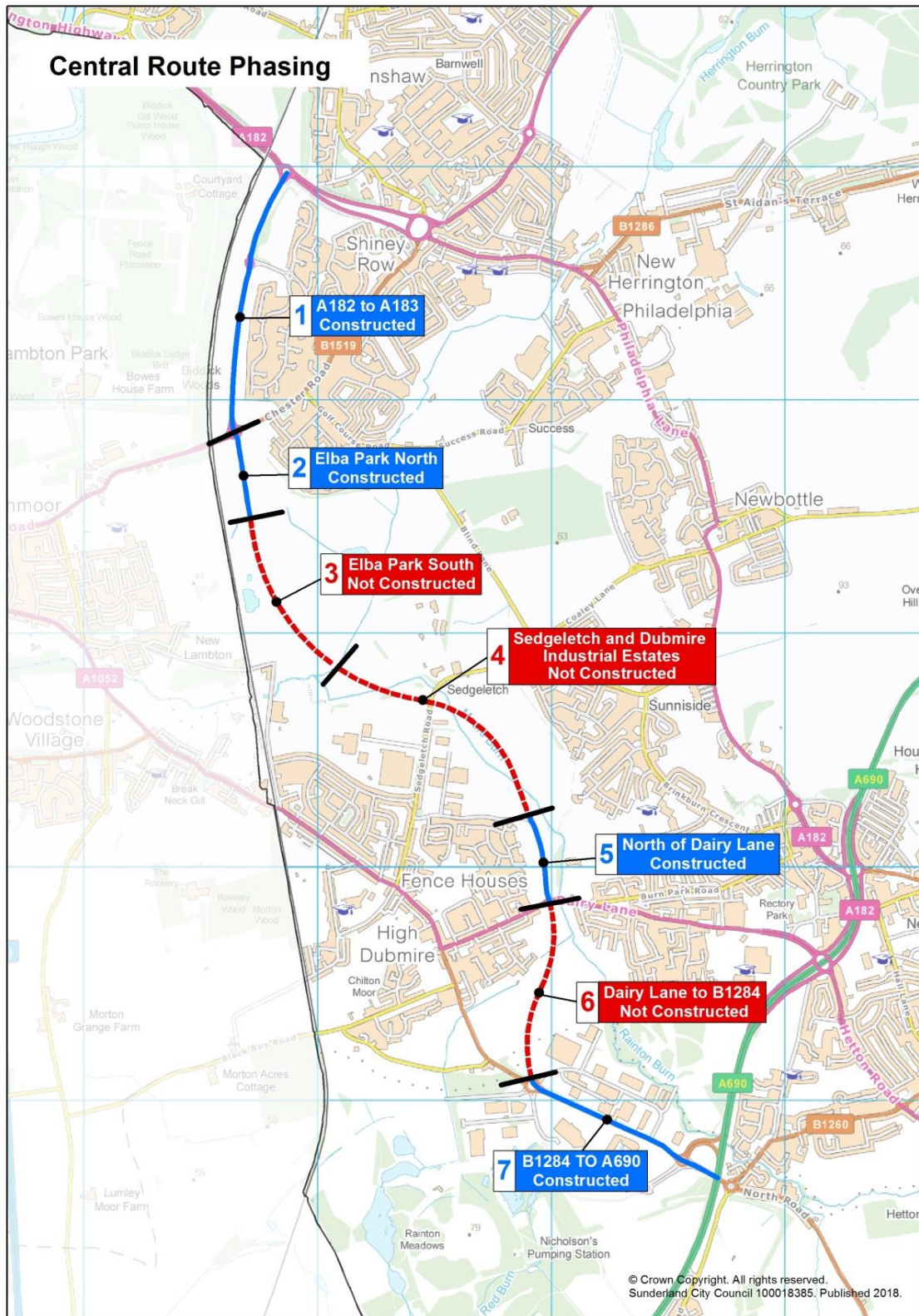


Figure 65 Central Route – Outstanding route to be completed.

Central Route alignment

- 14.57 The Central Route alignment was included in the UDP which was subject to an Examination in Public and adopted in September 1998. It has remained protected as a designation in the UDP for the last twenty years and is further supported through the T&WLTP3 (SP53)⁵²⁰.
- 14.58 At the same time as the UDP was adopted in 1998, proposals for the reclamation of the former Lambton Cokeworks site were developed. Originally the reclamation site straddled two local authority areas, Chester le Street and Sunderland, but following boundary changes in 1994 the entire site fell within Sunderland's administrative boundary. Its intended use was to support new leisure, recreational and visitor facilities on the 64.2ha site through application of UDP Policy HA10(2).
- 14.59 The Central Route alignment within the UDP would serve the Lambton Cokeworks site, providing an opportunity for its development for leisure and recreational uses. The road alignment identified within the UDP, considered a number of locational constraints that arose as a result of reclamation works which commenced in 1996, prior to the UDP's adoption. These included.
- The archaeological remains of an 18th Century wooden waggonway at the former Lambton D Pit⁵²¹ which was assessed as worthy of Scheduled Ancient Monument status (SP55)⁵²²⁵²³; and
 - The contaminated ground conditions in eastern part of the former cokeworks site.
- 14.60 Both of the above constraints were significant factors informing the identification of the road alignment in the UDP. The road alignment was positioned sufficiently far west to maximise the amount of land available for a housing allocation, on what is now the Elba Park development. It cannot be moved any further to the west without adversely impacting the archaeological remains of the wooden waggonway.
- 14.61 A significant number of residents of Elba Park responded to the Plan's Publication Draft consultation requesting that the alignment of the Central Route be more closely aligned to the Leamside Line, at a position furthest away from Elba Park's homes. Due to the waggonways position, the contaminated ground conditions and the potential for the Leamside Line to reopen to provide passenger and freight movements, it is not possible for the Central Route to be realigned to this location as the constraints to its relocation would be too significant. The road alignment has long been established due to these constraints and housing in this area has been granted planning permission on the assumption that the Central Route and its existing alignment are implemented to support it. Indeed, the original reclamation scheme for the Cokeworks site was always developed on the basis that the road would pass through the site (see planning application 98/01135/LAP).
- 14.62 Therefore, taking account of the above, the Central route alignment, as agreed in the UDP, for the remaining portion of the route has been transposed into the Plan's Policies Map (SD2) and its delivery will be supported through policy SP10 1iii) of the Plan

⁵²⁰ Chapter 15.2.2 (page 201)

⁵²¹ This proved to be the best preserved and most substantial example of a wooden waggonway yet to be discovered at the time.

⁵²² <http://twsitelines.info/SMR/5002>

⁵²³ County Archaeology Officer Email: Significance of Archaeology Lambton D Pit Wooden Waggonway (SP55).

A19 Junction Improvements

- 14.63 The Strategic Road Network (SRN) in Sunderland consists of the A19 and A194(M). The efficient operation of both the local and Strategic Road Network 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. It offers road users commuter routes and freight operators the means to carry products into and out of the region, particularly for Nissan. Given this mix, the route can be put under strain at the peak times by commuter traffic.
- 14.64 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 (Figure 66). 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.
- 14.65 A number of junction improvement schemes which will improve traffic flows on the A19 have already been identified and now have committed funding including:
- A19 Testo's junction in South Tyneside
 - A19 Downhill Lane junction near the boundary with Sunderland
 - A19 / A690 Doxford Park junction interim scheme
- 14.66 Highways England has modelled the impact of the Local Plan development to 2028 with these committed schemes in place and established that the highways infrastructure is insufficient to accommodate the anticipated increase in traffic on the SRN. Therefore, the following additional schemes will be required in order to adequately mitigate the impact of the plan to 2028:
- Southbound widening of A19 between Downhill Lane and Wessington Way
 - Improvement to A19 Wessington Way junction, including upgrade to off slip roads, widening of A1231 to east of junction and upgrade to Ferryboat Lane junction
 - North and southbound widening of A19 between Chester Road and Doxford Park
 - Major scheme at Doxford Park junction to provide segregated left turn from A690 west to A19 north
 - New road bridge over the A19 in North Sunderland to be delivered through the IAMP TWO Development Consent Order
- 14.67 The Council and Highways England are working together to further develop a delivery plan for the implementation of these measures and any further schemes which may be required to mitigate the plan to 2033. Details of this will be included in the MOU between the 2 parties. As and when these proposals progress the Council will update the IDP (SD59⁵²⁴).
- 14.68 As a result of ongoing conversations with Highways England, the following representations submitted by Highways England (PD4804, PD4840, PD4841, PD4842,

⁵²⁴ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

PD4843, PD4845, PD4846, PD4849 and PD4850)) have been revoked and the Council has proposed a number of modifications (M69, M70 and M72) and updated the IDP⁵²⁵.

- 14.69 The Council will work collaboratively with Highways England, the government and the LEP to seek funding the identified major improvement schemes through future rounds of the Road Investment Strategy or any other appropriate funding streams brought forward by central government.

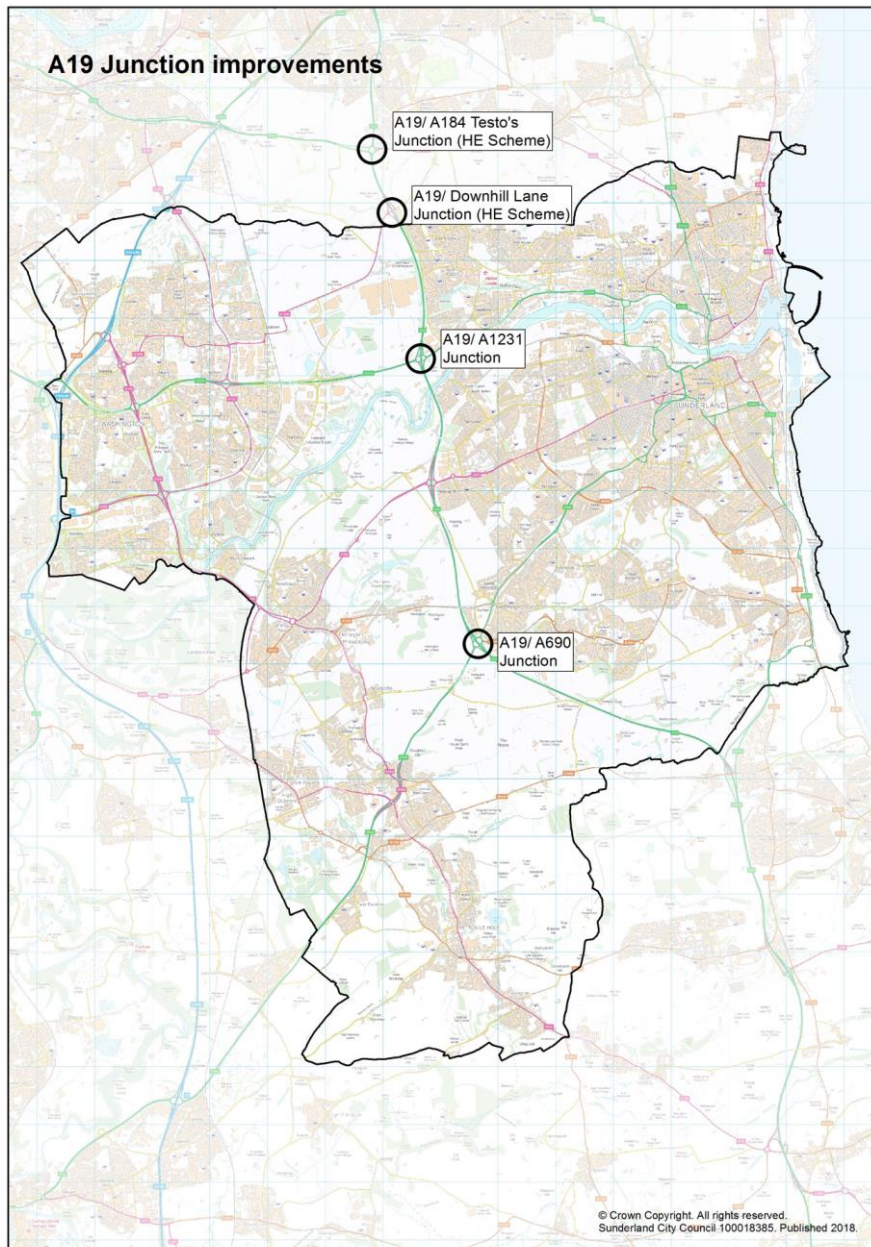


Figure 66 A19 Junction Improvements

⁵²⁵ [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=63680843179150000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=63680843179150000)

Sustainable Transport

- 14.70 In accordance with the NPPF⁵²⁶ the Council is seeking to improve access to sustainable transport modes across the city such as public transport, walking and cycling and improve barriers to access. This can be done through a range of measures, for example, introducing new cycle pathways, bus corridors or through implementation of pedestrian schemes such as pelican crossings, which can improve ease of movement around the city for those who choose to walk, cycle or access public transport. The Council must therefore improve the permeability of key transport routes, north to south and east to west, making it easier to travel across the city, and where possible, connect to and make use of larger strategic transport schemes such as the SSTC, Ryhope Doxford Link Road and Central Route to maximise the benefits of sustainable transport for its residents and businesses.
- 14.71 Policy SP10 (2) seeks to address permeability, congestion and access to sustainable transport across the city.

Transport routes/Bus Corridors

- 14.72 In order to promote more sustainable modes of transport and make these a more attractive option, the Council has identified a number of key transport routes/ into the city. The Council aim to deliver bus corridor improvements to these routes to improve the punctuality of bus services within city to reduce congestion and to encourage walking and cycling along these key local routes (Figure 67).
- 14.73 The Assessment of Transport Impacts (2017) (SD51⁵²⁷) identifies comprehensive bus service coverage in the Urban Core, Central Sunderland and parts of North and South Sunderland, due to the built up nature of the urban area. However, bus service coverage in Washington and the Coalfield is not as comprehensive, operating most frequently during peak periods and less frequently outside of these times⁵²⁸. In the context of the Plan's housing and employment development sites, modelling indicates that a series of new proposed bus connections should be implemented to support sustainable transport options for residents and businesses⁵²⁹. These routes follow the key transport routes identified in Figure 67. Therefore, any improvements to bus corridors along these routes, would assist to make journey times more efficient and contribute to sustainable public transport options for users. This in turn will assist to reduce congestion of key roads across the city area.
- 14.74 The T&WLTP3 (SP53) supports routes i-v) identified in policy SP10(2) as opportunity routes for improvement and congestion reduction. Routes vi) and vii) have become high priority over the last 10 years, together with routes i - v), as they provide the arterial transport network which links to the north east region via the strategic transport network.

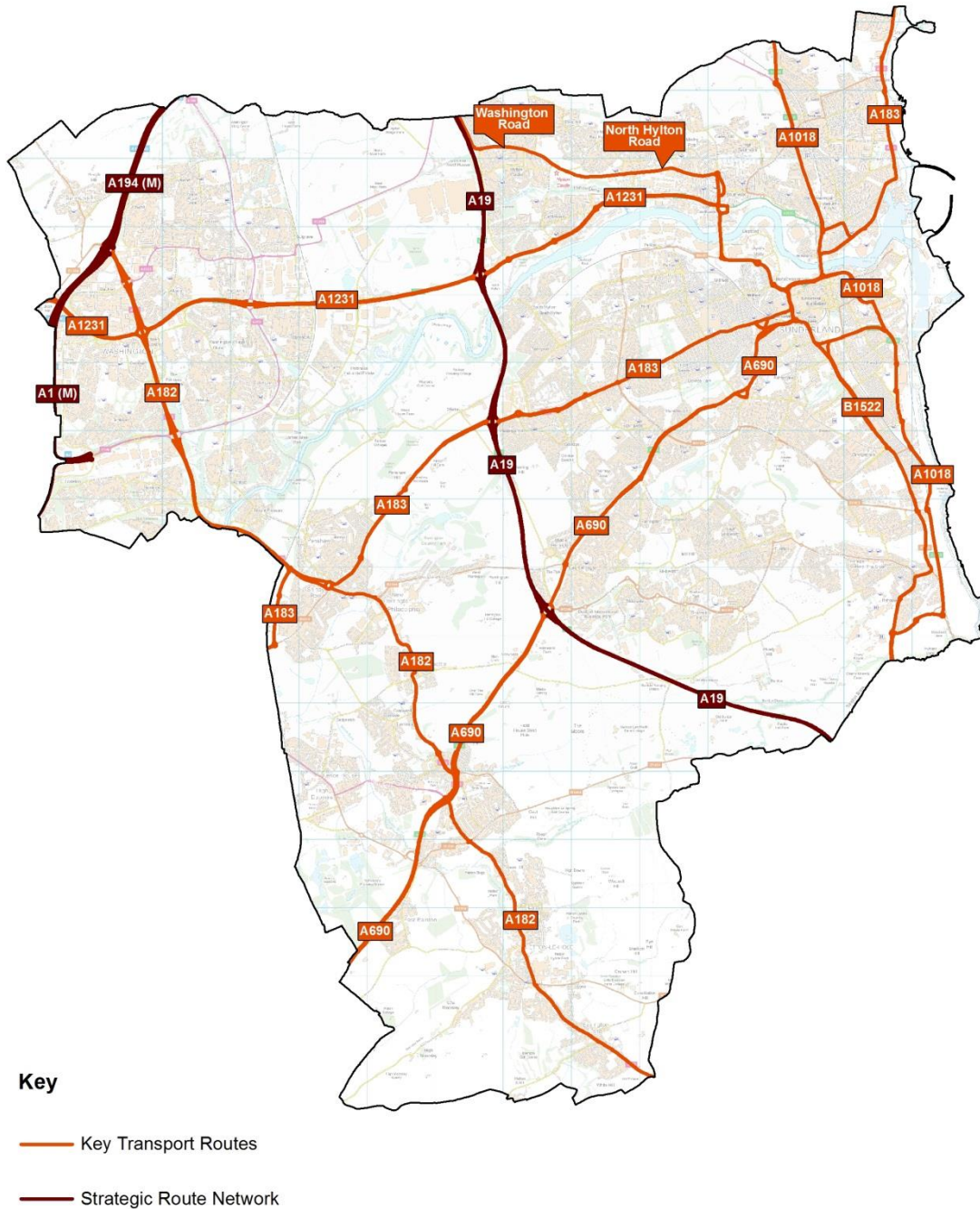
⁵²⁶ Paragraph 30

⁵²⁷ [https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁵²⁸ Assessment of Transport Impacts (2017) page 43 (SD51) (see above).

⁵²⁹ Assessment of Transport Impacts (2017) Appendix J. (SD51) (See above)

Key Transport Routes



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Figure 67 Key Transport Routes

Metro – South Hylton to Penshaw and Leamside Line

- 14.76 The Council recognise the significant value that the Tyne and Wear Metro provides in terms of connectivity for residents and businesses to the wider Tyne and Wear area and Newcastle Airport. However, the Metro network does not provide an option for many residents of the city⁵³⁰, as it only covers parts of Sunderland North, Sunderland South and the Urban Core. The Council, working with Nexus, will therefore support improvements to the network within the city, in particular proposals to extend the network where opportunities arise.
- 14.77 Nexus have identified potential future extensions to the Metro network within the city including to Seaham, Doxford and Washington (Figure 68)⁵³¹. The extension to Seaham would utilise the Durham Coast railway line, whilst the extensions to Doxford and Washington would require significant investment in new infrastructure. Whilst extensions to the Metro network would provide sustainable travel options for residents and businesses and provide wider economic benefits to the city area, the investment required to implement these schemes would be significant and they are not expected to be delivered within the Plan's period.
- 14.78 Where details of potential rail alignments for Metro use are known, such as the South Hylton to Penshaw alignment and the Leamside Line, these have been safeguarded for potential future use in policy SP10 5i & 5ii (Figures 69 and 70). Should a need arise for new stations; the Council will work with Nexus to identify and allocate land for this purpose through the Allocations Development Plan Document.

⁵³⁰ Assessment of Transport Impacts (2017) – Appendix I Public Transport Accessibility Ranking Results (SD51)
[https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁵³¹ Metro Futures - <https://www.nexus.org.uk/sites/default/files/Metro%20Futures%20brochure.pdf>

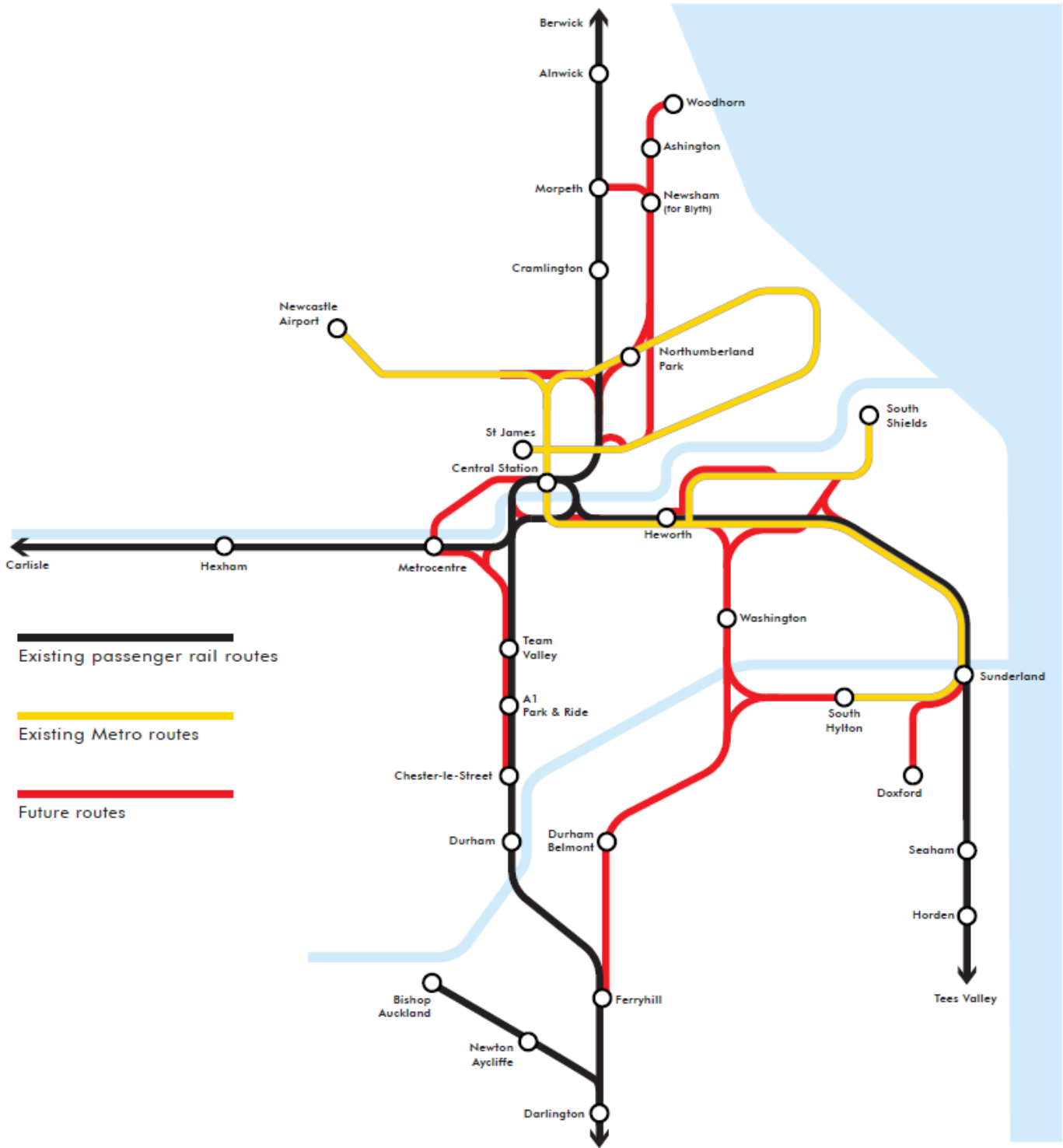


Figure 68 Potential Metro Expansions

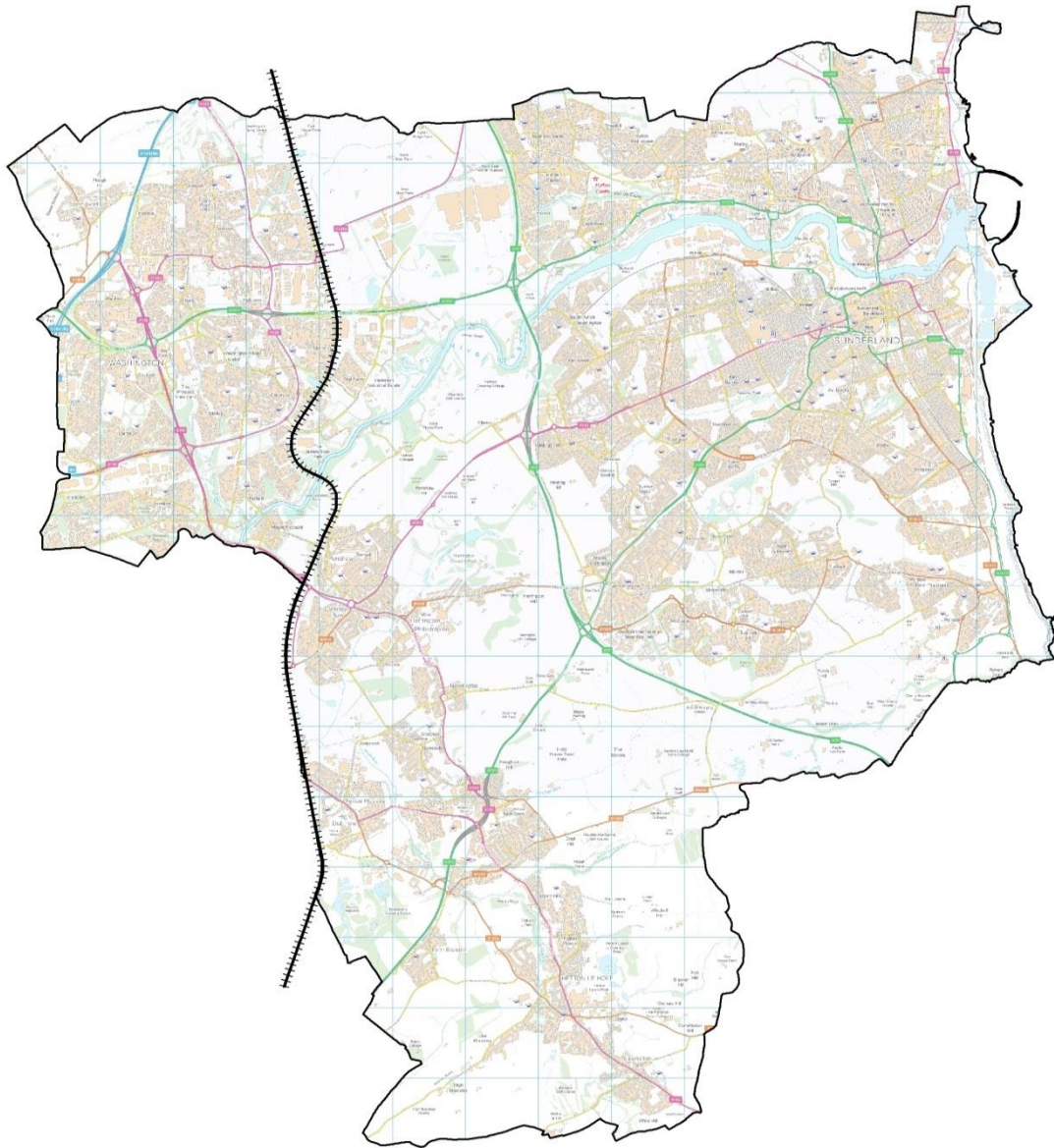
South Hylton to Penshaw line



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Figure 69: South Hylton to Penshaw alignment

Leamside Line



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Figure 70 Leamside Line alignment

Rail - Leamside Line

- 14.79 The NPPF makes clear that local planning authorities should identify and protect where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice⁵³². The Leamside Line is considered to be one such route within Sunderland's administrative boundary which is worthy of protection.
- 14.80 Since closure of the line in 1991 a number of historical studies have been undertaken looking into issues and opportunities that line reintroduction for passenger, freight and high speed trains would offer Sunderland and the North East region. Railtrack undertook some internal studies in the late 1990s examining the longer term potential of the Leamside Line as a high speed route similar to the French TGV routes. The reopening of the line was also included in successive Network Management Statements up until the creation of Network Rail in 2002.
- 14.81 Regionally, the Leamside Line is supported through the North East Rail Statement, which seeks to implement rail improvements over the next fifteen year period, to deliver economic benefits to the north east region. Its protection is reinforced by the neighbouring local authorities of Newcastle, Gateshead and Durham, who support the line's protection within their respective Local Plans⁵³³ to deliver additional passenger services or freight services should the need arise.
- 14.82 The Leamside Line is particularly important to Sunderland as it provides direct access to the East Coast Mainline, which is one of the arterial rail links South and North. The re-opening of the Leamside Line has significant potential to increase passenger rail capacity on the East Coast Main Line (ECML) and Durham Coast line through removal of freight trains from these routes. This would greatly assist to free up capacity for additional passenger trains on these lines, both of which serve larger populations providing arterial routes to London and Scotland, with potential for passenger services to Sunderland.
- 14.83 The Line would also afford opportunities to provide Metro operations to Washington (as discussed above). If this were combined with the reinstatement of the spur between South Hylton and Penshaw, it would allow for the creation of a 'Wearside Loop' for Metro and the potential for a link between Sunderland station and the ECML for inter-city and Northern Powerhouse Rail (NPR) trains, which would provide wider economic opportunities for Sunderland.
- 14.84 It is important to note that Leamside Line isn't the complete answer to rail capacity problems in the north east as it shares track with Durham Coast between Pelaw and Newcastle. However, in the case of the ECML, there is significant potential to free up paths on both ECML and Durham Coast simply by taking one freight train per hour off each of them. In the case of ECML, taking the one freight per hour off would allow the Northern Powerhouse Rail aspiration of nine passenger trains per hour.

⁵³² National Planning Policy Framework (2012) paragraph 41 and also in the National Planning Policy Framework (2018) paragraph 104c).

⁵³³ [Newcastle & Gateshead Councils – Planning for the Future: Core Strategy and Urban Core Plan for Gateshead and Newcastle upon Tyne 2010-2030 \(March 2015\)](https://www.gateshead.gov.uk/media/7765/Core-Strategy-and-Urban-Core-Plan-for-Gateshead-and-Newcastle-upon-Tyne-2010-2030-(March-2015)-Page-86,-Policy-CS13(2iii)-&Page-275,-Policy-KEA2-https://www.gateshead.gov.uk/media/7765/Core-Strategy-and-Urban-Core-Plan-for-Gateshead-and-Newcastle/pdf/Core-Strategy-and-Urban-Core-Plan-for-Gateshead-and-Newcastle_SMALLER.pdf?m=636619103092500000) – Page 86, Policy CS13(2iii) & Page 275, Policy KEA2 - https://www.gateshead.gov.uk/media/7765/Core-Strategy-and-Urban-Core-Plan-for-Gateshead-and-Newcastle/pdf/Core-Strategy-and-Urban-Core-Plan-for-Gateshead-and-Newcastle_SMALLER.pdf?m=636619103092500000
Durham Council – [County Durham Plan Preferred Options](http://durhamcc-consult.limehouse.co.uk/portal/planning/preferredoptions?tab=files) Page 127, Para 5.194) - <http://durhamcc-consult.limehouse.co.uk/portal/planning/preferredoptions?tab=files>

14.85 The Leamside Line is supported in the T&WLTP3 (SP53)⁵³⁴ as a route that offers multiple options for rail travel. The line has been safeguarded for future use within the Policy SP10 in order to secure wider economic benefits for the north east region and for Sunderland. The policy allows for sufficient flexibility deliver and support Metro/rail extensions and development of stations, should the line be reintroduced within the plan period, and is supported by neighbouring local authorities in their respective Local Plans.

Public Rights of Way and Cycling

14.86 The city has an extensive network of more than 225km of public rights of way and cycle lanes. The Council will support improvements to the existing network and extensions to improve accessibility across the city by more sustainable methods such as walking and cycling.

14.87 The evidence base indicates that there are disparities in access to cycle and walking networks across the city area. The most comprehensive cycling and walking connectivity can be found within Sunderland Central sub area, which offers good connectivity and permeability for those who choose to cycle or walk. The Coalfields sub area is the least well connected. In the context of the Plan's HGAs and employment proposals, 50% of sites are proposed in locations with high cycle accessibility whilst only 20% have high walking accessibility (SD51)⁵³⁵.

14.88 Transforming Cities Fund (TCF) TCF was announced in the Autumn 2017 Budget and was subsequently extended in the Autumn 2018 Budget. The fund has the aim of driving up productivity and spread productivity through investment in public and sustainable transport in some of England's largest city regions. The focus is on making it easier for people to get around to access employment opportunities.

14.89 Initially £1.7bn was made available but this was increased to £2.4bn of which £1.1bn is ring fenced to Mayoral Combined Authorities. The remainder is allocated to 10 city regions of which the North East Joint Transport Committee is one. Funding is allocated in two tranches:

- Tranche 1 – early delivery schemes;
- Tranche 2 – longer term programme

14.90 Tranche 1 schemes must be delivered in 2019 and can include cycling and walking schemes, smart traffic controls and low carbon vehicle support. A number of cycling schemes identified in Policy SP10 2) are being developed for submission under Tranche 1

14.91 The Council is committed to improving access to walking and cycling networks. A range of desirable cycling and walking schemes are identified within the IDP (SD59) that the Council hopes to deliver within the Plan's period (Figure 71)⁵³⁶. Whilst these schemes are not essential for the Plan's delivery, they serve to improve permeability and access across the city area and are necessary to achieving the strategic objectives of policy SP10(2), to encourage walking and cycling and reduce congestion. They also serve to address

⁵³⁴ Pages 120 and 210 [https://www.sunderland.gov.uk/media/20953/SP-53-Keep-Tyne-and-Wear-Moving-LTP-The-Third-Local-Transport-Plan-for-Tyne-and-wear-2011-/pdf/SP.53_Keep_Tyne_and_Wear_Moving_-_LTP_The_Third_Local_Transport_Plan_for_Tyne_and_Wear_\(2011\).pdf?m=636803144846930000](https://www.sunderland.gov.uk/media/20953/SP-53-Keep-Tyne-and-Wear-Moving-LTP-The-Third-Local-Transport-Plan-for-Tyne-and-wear-2011-/pdf/SP.53_Keep_Tyne_and_Wear_Moving_-_LTP_The_Third_Local_Transport_Plan_for_Tyne_and_Wear_(2011).pdf?m=636803144846930000)

⁵³⁵ Assessment of Transport Impacts (2017) – paragraphs 10.2.4 and 10.2.5. [https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁵³⁶ Pages 93-96, schemes 9,11,12,13 & 14 [https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_\(December_2018\).pdf?m=636808431791500000](https://www.sunderland.gov.uk/media/21029/SD-59-CSDP-Infrastructure-Delivery-Plan-Updated-December-2018-/pdf/SD.59_CSDP_Infrastructure_Delivery_Plan_Updated_(December_2018).pdf?m=636808431791500000)

deficiencies in connectivity identified in the Coalfield area. All schemes and routes are supported through the T&WLTP3 (SP53) and the Rights of Way Improvement Plan (RoWIP) (SP53).

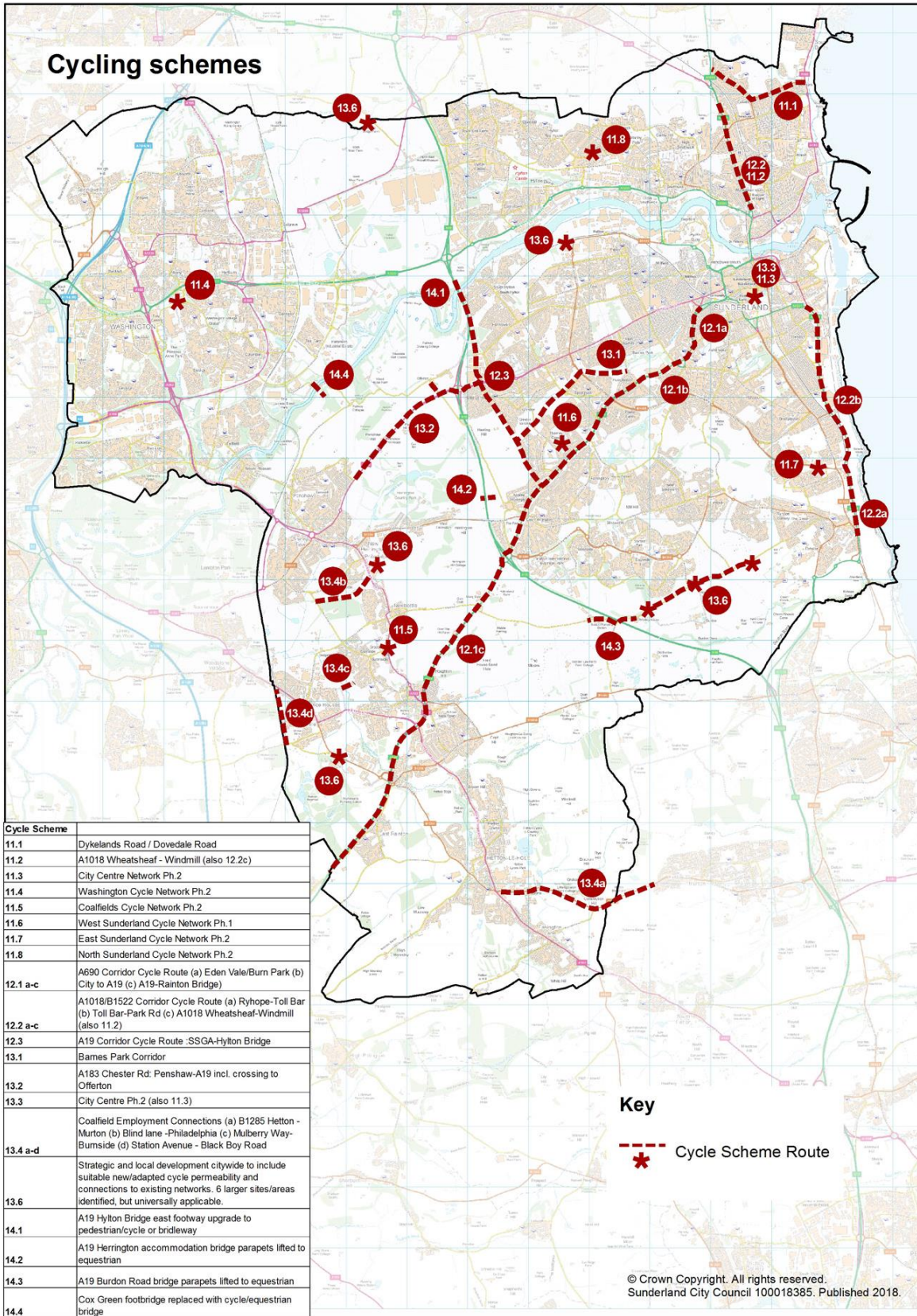


Figure 71 Sunderland Cycling Schemes

Reasonable Alternatives

14.92 The Council considers there are no reasonable alternatives to this policy approach to ensure that Sunderland has a connected transport network. A number of alternative approaches have been considered including;

- Central Route re-alignment - A significant number of residents raised concerns at the Publication Draft consultation stage regarding the alignment of the Central Route and suggested that it be more closely aligned to the Leamside Line, as its current alignment would serve to reroute traffic through existing neighbourhoods. However, for reasons identified above, this can be discounted as it would affect archaeological remains worthy of Scheduled Ancient Monument status, and ground conditions would prevent an alignment this far west.
- Ryhope Doxford Link Road re-alignment - Bellway Homes raised concerns that the Ryhope Doxford Link Road would sterilise their land interest if developed in accordance with the link road alignment identified on the Plan's Policies Map (PD1824 & PD1825). Bellway Homes suggested an alternative route. The link road alignment is a long standing route identified in the Sunderland UDP, the Ryhope Tunstall Periphery: Planning Guidance and is supported in the T&WLTP3. The site in question lies within the boundary of the land owned by the Burdon Lane Consortium (Persimmon, Story Homes and Taylor Wimpey), who has been consulted extensively regarding the link road alignment. The Council is of the opinion that the link road alignment is indicative at this stage and is subject to further detailed design, in line with the requirements of the SSGA SPD once adopted.

Effective

Deliverable

14.93 The policy will be delivered by a range of stakeholders including the Council, Highways England and Nexus. Developer contributions will be sought, where possible, to assist the delivery of schemes identified within the policy and the Council will bid for funding to support the delivery of these schemes where possible. The infrastructure schedule set out within the IDP (SD59) provides further detail on how the individual schemes within the policy will be delivered, including indicative costs, phasing and the lead organisation. The IDP is a 'live' document and will be regularly updated.

Monitored

14.94 The policy will be monitored in accordance with the Monitoring Framework, as detailed below.

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP10	Connectivity and transport network	Aims to improve accessibility by sustainable transport modes to local services, centres and key facilities	<ul style="list-style-type: none"> • Lack of progress of the schemes identified through the policy • Significant increase in traffic flows • Significant decrease in the number of cycle trips • Lack of 	<ul style="list-style-type: none"> • Identify reasons for lack on implementation • Review of Local Transport Plan projects and priorities • Review of the Infrastructure Delivery Plan and the schemes 	<ul style="list-style-type: none"> • Delivery of the essential transport-related schemes in the Infrastructure Delivery Plan (IDP) • Progress of the desirable and aspirational transport related 	<ul style="list-style-type: none"> • SCC monitoring data • Infrastructure Delivery Plan (IDP) • Nexus/LTP monitoring • Tyne & Wear Traffic & Accident Data Unit (TADU) • Highways England monitoring

			<p>progress extending and improving the cycle network</p> <ul style="list-style-type: none"> • Lack of progress securing improvements to metro and rail network • Consent granted for development on land safeguarded for future railway alignments 	<p>within it</p> <ul style="list-style-type: none"> • Explore opportunities to address under-delivery including accessing additional funding sources • Potential review of the Policy/Plan 	<p>schemes in the Infrastructure Delivery Plan (IDP)</p> <ul style="list-style-type: none"> • Length of new cycleways delivered • Number of improvements to existing cycleways • Bus/metro ridership • Applications for development on safeguarded land 	<ul style="list-style-type: none"> • Traffic counts • Cycle counts
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Consistent with National Policy

14.95 The policy is consistent with Paragraphs 29 and 30 of the NPPF as it seeks to promote sustainable transport modes and give people a choice about how they travel. It also includes schemes such as exploring park and ride opportunities which would support reductions in greenhouse gas emissions and reduce congestion.

Policy ST1: Urban Core Accessibility and Movement

Policy

ST1 Urban Core Accessibility and Movement

Accessibility to and movement through the Urban Core will be enhanced by:

1. discouraging the use of streets by through-vehicular traffic;
2. increasing priority for pedestrians and cyclists in the Primary Shopping Area;
3. improving the cycle network;
4. improving 'legibility' and signage for pedestrians;
5. providing for operational access for businesses;
6. improving the provision of car parks around the ring road;
7. reducing the 'barrier' effect of the ring road in relation to adjacent areas;
8. improving the attractiveness of Park Lane Interchange; and
9. working with rail industry partners to:
 - i. improve the connectivity of Sunderland to other major centres; and
 - ii. supporting redevelopment and improvement of Sunderland Station.

Positively Prepared

Vision and Strategic Priorities

14.96 The policy will assist the delivery of the vision by helping to provide excellent transport links and sustainable access for visitors, business and residents. It will also help to create a City Centre that is revitalised and has become a destination of choice, a place for people to live, work and spend their leisure time.

14.97 Policy ST1 will help to deliver Strategic Priorities 3 and 11.

**Draft Plan Comments
Issues Raised**

- Nexus and Highways England supports the policy.

How Issues Have Been Taken into Account

- No issues identified.

**Publication Draft Plan Comments
Issues Raised**

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

Duty to Cooperate

14.98 No duty to cooperate issues identified.

Sustainability Appraisal (2017)

14.99 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

14.100

he SA made no recommendations for changes to be made to the Draft Plan:

Sustainability Appraisal (2018) (SD6)

14.101 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	++	++	++	~	~	~	++	++	~	~	+

14.102 The SA made no recommendations for changes to be made to the Publication Draft

Justified

14.103 The Urban Core is the main administrative centre of Sunderland and is the focus for a wide range of civic, retail, cultural and leisure uses. It is also the home to both campuses of the University of Sunderland. Ensuring that the Urban Core is highly accessible by a range of transport methods and ensuring ease of movement throughout the Urban Core is therefore important, to improve and maintain the vitality of the City.

14.104 The principles of the policy seek to break down barriers to the movement of pedestrians and cyclists, increasing the permeability of the Urban Core; improve the legibility of signage to enhance mobility through the Urban Core; improve peripheral car parking and cycle network provision; and improve the connectivity and accessibility to and within the Urban Core via vehicular and rail links. All aspects of this policy accord with the NPPF⁵³⁷, which seeks to exploit opportunities for the use of sustainable modes of transport for the

⁵³⁷ Paragraphs 34 and 35

movement of goods and people, particularly where developments generate significant movements.

14.105 The Council recognise accessibility and movement are integral to the function of the Urban Core and is in the process of preparing a Movement Strategy to set out how improvements to accessibility and movement through the Urban Core will be achieved. This strategy will accord with NECA Transport Manifesto (SP68⁵³⁸) and its emerging Transport Plan.

14.106 The policy is therefore aligned to the emerging Movement Strategy and will assist in its delivery of points criterion 1-9 of Policy ST1. In addition, this policy will support the delivery of rail improvements and connectivity identified in the Metro Futures (SP66⁵³⁹) strategy, for expansion of the Metro network.

Reasonable Alternatives

14.107 No reasonable alternatives.

Effective

Deliverable

14.108 The policy will be delivered by the Council through the delivery of its emerging Movement Strategy, with support from external partners. Where necessary, site specific allocations will be made through the Allocations and Designations Plan to facilitate the delivery of the policy.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ST1	Urban Core accessibility and movement	Sets out principles for interventions that address accessibility and movement issues in Sunderland Urban Core.	<ul style="list-style-type: none"> Failure to develop a coherent NECA Transport Manifesto Lack of progress of specific schemes identified through policy Significant increase in traffic flow through the city centre Lack of progress improving the cycle network Significant decrease in number of 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Review of Urban Core specific policies Review of the Infrastructure Delivery Plan and the schemes within it Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Progress delivering the identified schemes in line with IDP phasing Number of improvements to existing cycleways Number of road traffic accidents and road safety levels within the city centre Air quality within Urban Core Number of parking spaces in car parks around the ring road 	<ul style="list-style-type: none"> SCC monitoring data Nexus/LTP monitoring Rights of Way Improvement Plan Tyne & Wear Traffic & Accident Data Unit (TADU) Traffic counts Cycle counts Air Quality Annual Status Report National CO₂ emissions

⁵³⁸ https://www.sunderland.gov.uk/media/21034/SP-68-NECA-Transport-Manifesto/pdf/SP.68_NECA_Transport_Manifesto.pdf?m=63680844271170000

⁵³⁹ https://www.sunderland.gov.uk/media/21034/SP-68-NECA-Transport-Manifesto/pdf/SP.68_NECA_Transport_Manifesto.pdf?m=63680844271170000

			<p>cycle trips and travel by sustainable modes</p> <ul style="list-style-type: none"> • Significant decrease in the number of parking spaces in car parks around the ring road • Lack of delivery of the bus strategy • Lack of delivery of improvements to public transport facilities • Failure to deliver improvements to Sunderland Rail Station 		<ul style="list-style-type: none"> • Additional rail services from Sunderland station • Bus/metro ridership • Public realm schemes implemented 	
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Consistent with National Policy

14.109 The policy is consistent with Paragraph 35 of the NPPF which indicates that plans should exploit the opportunities for the use of sustainable transport modes for the movement of goods or people, including giving priority to pedestrian and cycle movements and having access to high quality public transport facilities; and creating safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter.

Policy ST2: Local Road Network

ST2 Local Road Network

1. The Local Road Network will be protected for safe and efficient movement in accordance with the following road hierarchy:
 - i. Distributor Roads;
 - ii. Category 1 Roads;
 - iii. Category 2A Roads; and
 - iv. Category 3 Roads.
2. To ensure that development has no unacceptable adverse impact on the Local Road Network, proposals must ensure that:
 - i. where a new vehicular access is accepted in principle, the number of access points will be kept to a minimum and new access points will be designed and constructed in accordance with the current highway design standards;
 - ii. they have safe and adequate means of access, egress and internal circulation/turning arrangements for all modes of transport relevant to the proposal;
 - iii. where an existing access is to be used, substandard accesses will be improved and/or upgraded in accordance with the current standards for the category of road;
 - iv. they are assessed and determined against current standards for the category of road having regard to the capacity, safety and geometry of the highway network;
 - v. they have safe and convenient access for sustainable transport modes relevant to its

- location; and
- vi. they will not create a severe impact on the safe operation of the highway network; resulting in potential risk to all highway users with specific consideration given to vulnerable road users.

Vision and Strategic Priorities

14.110 The policy will assist the delivery of the spatial vision by helping to provide excellent transport links and sustainable access for visitors, business and residents.

14.111 Policy ST2 will help to deliver Strategic Priorities 11.

Draft Plan Comments

Issues Raised

- Highways England supports the policy.
- Developers consider the policy to be unreasonable as it sets an unreasonably high test which should be revised.

How Issues Have Been Taken into Account

- Policy ST2 has been amended to indicate that development should have no unacceptable adverse impacts.

Publication Draft Plan Comments

Issues Raised

- Northumbrian Water (PD2714) supports the policy with amendments to the text 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 the category of road;*"
- A significant number of residents/general public objected to the policy via Springwell Village Residents Association on the grounds it is at odds with Policies SS2 and SS3 as development at Springwell Village would have unacceptable adverse impacts on the Local Road Network.

How Issues Have Been Taken into Account Prior to Submission

14.112 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representations raised by Northumbrian Water the Council does not feel it necessary to make any modifications as Policy ST2(2) provides a framework to assess all planning applications. All applications must satisfy points i) to vi), otherwise unacceptable impacts to the local road network would occur. The Council considers it appropriate to retain the criteria within the policy to assess applications.

14.113 In response to the representations raised by Springwell Village Residents Association the Council does not feel it necessary to make any modifications. A Transport Assessment has been prepared for the Policy SS2 sites and for Policy SS3 and the findings will have to be implemented as the site comes forward. The noise that would be generated during the construction of the site would be temporary and hours of work can be controlled by condition on the planning application.

Sustainability Appraisal (2017)

14.114 The following table is a visual summary of the detailed assessment provided in SA Appendix C. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

14.115 The SA made no recommendations for changes to be made to the Draft Plan

Sustainability Appraisal (2018) (SD6)

14.116 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	++	+	++	~	~	~	++	++	~	~	~

14.117 The SA made no recommendations for changes to be made to the Publication Draft

Duty to Cooperate (SD11)

14.118 No duty to cooperate issues identified.

Justified

14.119 The NPPF is clear that developments that generate significant amounts of movements should have no unacceptable adverse impacts on the transport network⁵⁴⁰. Whilst the strategic road network is important in providing connections between Sunderland and the wider area, the vast majority of roads within the city form part of the local road network. It is therefore important that the potential impact of development proposals on the safe operation of the local network are considered as part of any planning applications, thus justifying the need for Policy ST2 within the Plan.

14.120 The Assessment of Transport Impacts (SD51⁵⁴¹) and Addendums 1 and 2 (SD52⁵⁴² & SD53⁵⁴³) modelled the projected impacts of the Plan's development proposals on the local road network and identified mitigation measures to alleviate pressures on the road system should they arise. The assessments did not indicate any significant local road network issues in the city area on category 2 and 3 roads, as a result of development proposals within the Plan. However, it is anticipated that in the future a number of key junctions on the SRN (distributor roads), linking to category 1 roads, 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

⁵⁴⁰ Paragraph 32

⁵⁴¹ [https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_\(2017\).pdf?m=636803105630930000](https://www.sunderland.gov.uk/media/20893/SD-51-Sunderland-Local-Plan-Initial-Assessment-of-Transport-Impacts-2017-/pdf/SD.51_Sunderland_Local_Plan_-_Initial_Assessment_of_Transport_Impacts_(2017).pdf?m=636803105630930000)

⁵⁴² [https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-/pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_\(2018\).pdf?m=636803106569000000](https://www.sunderland.gov.uk/media/20894/SD-52-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-One-April-2018-/pdf/SD.52_Sunderland_Local_Plan_-_Assesment_of_Transport_Impacts_-_Addendum_One_(2018).pdf?m=636803106569000000)

⁵⁴³ [https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_\(2018\).pdf?m=636803107219430000](https://www.sunderland.gov.uk/media/20895/SD-53-Sunderland-Local-Plan-Assessment-of-Transport-Impacts-Addendum-Two-April-2018-/pdf/SD.53_Sunderland_Local_Plan_-_Assessment_of_Transport_Impacts_-_Addendum_Two_(2018).pdf?m=636803107219430000)

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.

14.121 The policy therefore establishes the local road hierarchy which is currently utilised by the Council in its role as the local highways authority (Figure 72) and details a criterion led approach to assess development proposals to ensure that there is no unacceptable adverse impact on the Local Road Network, which in turn could have an impact on the SRN (distributor roads). It is recognised that most forms of development are likely to impact upon the Local Road Network by creating additional trips and the policy seeks to minimise these impacts to ensure safe operation and management of roads in Sunderland.

Effective

Deliverable

14.123 The policy will be delivered through the submission and determination of planning applications. Applicants will be required to submit Transport Assessments/Transport Statements as appropriate to assess the potential impacts of proposed development upon the local road network and identify where mitigation will be required to make the impacts acceptable. The Council’s Highway Engineers will be consulted on planning applications as representatives of the local highways authority to ensure that any impacts upon the local road network are acceptable.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ST2	Local Road Network	Sets out the principles on which major highway infrastructure schemes will be developed to support wider policies in the Local Plan	<ul style="list-style-type: none"> When the local network is not capable of supporting the scale of development 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Policy/Plan Review of the Infrastructure Development Plan and Local Transport Plan 	<ul style="list-style-type: none"> Traffic flows monitoring (vehicular and cycling) Number of road traffic accidents on local road network Applications granted contrary to Highways advice 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Transport modelling Tyne & Wear Traffic & Accident Data Unit (TADU)

Consistent with National Policy

14.124 The policy is consistent with Paragraph 32 of the NPPF which indicates that plans and decisions should take account of whether safe and suitable access to the site can be achieved for all people.

Policy ST3: Development and Transport

ST3 Development and Transport

Development should:

1. provide safe and convenient access for all road users, in a way which would not:
 - i. compromise the free flow of traffic on the public highway, pedestrians or any other transport mode, including public transport and cycling; or
 - ii. exacerbate traffic congestion on the existing highway network or increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists and other vulnerable road users;
2. incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network;
3. submit an appropriate Transport Assessment/Transport Statement and a Travel Plan. This must demonstrate that appropriate mitigation measures can be delivered to ensure that there is no detrimental impact to the existing highway;
4. include a level of vehicle parking and cycle storage for residential and non-residential development, in accordance with the council’s parking standards;

5. provide an appropriate level of electric vehicle parking and charging infrastructure for commercial and non-residential development to suit site specific requirements, and make provision for the installation of home charging apparatus on major residential schemes; and
6. safeguard the existing network of Definitive Public Rights of Way. If this cannot be accommodated, then a diversion and/or alternative route shall be provided.

Positively Prepared

Vision and Strategic Priorities

14.125 The policy will assist the delivery of the spatial vision by helping to provide excellent transport links and sustainable access for visitors, business and residents.

14.126 Policy ST3 will help to deliver Strategic Priorities 3 and 11.

Draft Plan Comments

Issues Raised

- Developers requested further clarification for point 5 as it is not in accordance with the NPPF
- Highways England support the policy
- Nexus request more reference to public transport
- Historic England request that some conversion/historic building could not meet parking standards.

How Issues Have Been Taken into Account

- Policy ST3 and the supporting text have been updated to provide further clarity. The Council consider the revised policy to be justified and consistent with national policy.
- Policies SP10 and ST3 include specific reference to improving the public transport network. Policy ST1 has also been amended to emphasise the need to develop in sustainable locations in close proximity to transport hubs and encouraging higher density development close to transport hubs. The Council will continue to consult with Nexus on relevant planning applications, however it is not considered necessary to include this process within the Plan.
- It is acknowledged that some conversions of historic buildings may not be able to meet parking standards, but it is not considered necessary to update the policy to reflect this.

Publication Draft Plan Comments

Issues Raised

- Burdon Lane Consortium (PD2760) supports the policy with amendments to the policy text to be consistent with Paragraph 32 of the NPPF which relates to the residual impacts of development being severe. It is suggested that it is not clear what the Council's parking and home charging standards are. It is claimed highway mitigation is not always necessary prior to development taking place and it could affect site viability.
- Persimmon Homes (PD4159) points to inconsistencies between Policy ST3 and the NPPF. The tests in the policy could be amended to ensure consistency with the NPPF. The policy requirements for home charging apparatus could be clearer and it is not always necessary for mitigation to be provided before development commences.

How Issues Have Been Taken into Account Prior to Submission

14.127 The Council acknowledges that highway mitigation is not always necessary prior to development taking place. In response to the representations raised by Persimmon

Homes (PD4159) and Burdon Lane Consortium (PD2760), the Council has proposed additional modifications as set out in the Schedule of Modifications.

14.128 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
12.19	It is therefore important that the potential impacts of development are understood and that any necessary improvements <u>are</u> identified prior to the development taking place <u>and</u> <u>implemented at an appropriate time</u> during the proposals development.	To address representations submitted by Burdon Lane Consortium and Persimmon (PD2760 and PD4159).

Sustainability Appraisal (2017)

14.129 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix C.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

14.130 The SA made the following recommendation for changes to be made to the publication draft:

No changes proposed.

Sustainability Appraisal (2018) (SD5)

14.131 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix F.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	~	~	~	~	~	++	~	~	~	++	++	~	~	~

14.132 The SA made no recommendations for changes to be made to the publication draft

Amendments to the Draft Plan

14.133 Minor modifications to the policy have been proposed to improve clarity. This includes the policy being amended to indicate that development 'should' rather than development 'must' and amendments to the provide greater clarity on the circumstances in which the Council would expect electric charging points to be provided as part of development schemes.

Duty to Cooperate (SD11)

14.134 No duty to cooperate issues identified.

Justified

14.135 Development proposals impact upon the transport network as a result of additional trips being generated. It is therefore important that the potential impacts of development are understood and that any necessary improvements are identified and implemented prior to development taking place. The scope of transport evidence required in support of a planning application will depend upon the scale and type of development proposed.

Travel Assessments & Travel Plans

14.136 The NPPF is clear that developments that generate significant amounts of movements should have no unacceptable adverse impacts on the transport network and expects that all development proposals that result in significant movements be supported a Transport Assessment or Transport Statement⁵⁴⁴.

14.137 The policy sets out the requirement for a Transport Assessment/Transport Statement and a Travel Plan to be submitted in support of a planning application. This information will be utilised when determining whether the potential impacts would be acceptable upon the transport network and what mitigation may be required.

Sustainable Modes of Transport

14.138 The NPPF also advocates patterns of development which, where reasonable to do so, facilitates the use of sustainable modes of transport, contributing to wider sustainability and health objectives⁵⁴⁵. In order to encourage more sustainable methods of transport, the policy indicates that developers should seek to incorporate pedestrian and cycle routes within and through their site, linking to the wider sustainable transport network. This will also encourage the use of walking and cycling routes for recreational use which can have positive impacts upon the health and wellbeing of local residents and increases the permeability of development sites and the city area.

Parking Standards

14.139 It is recognised that providing inadequate levels of vehicle and cycling parking can have a significant adverse impact upon the safe operation of the local road network as a result of encouraging additional parking on the highway in potentially unsafe locations. The policy therefore requires applications to be in accordance with the Council's adopted parking standards.

14.140 These standards are set out as Supplementary Guidance within the currently adopted Development Control Guidelines (SP69⁵⁴⁶). It is recognised that these do not meet with current demands of market conditions in terms of house types, car models and levels of ownership. This is also relevant to the increasing market for electric vehicles, which includes the Nissan LEAF which is manufactured in Sunderland.

14.141 Vehicle parking is not the only consideration when reviewing parking standards. To provide for sustainable and accessible development, there is also the intention to review

⁵⁴⁴ NPPF 2012 paragraphs 32 and 36

⁵⁴⁵ NPPF 2012 paragraphs 29 and 30

⁵⁴⁶ https://www.sunderland.gov.uk/media/21035/SP-69-Development-Control-Guidelines-Parking-Standards/pdf/SP.69_Development_Control_Guidelines_-_Parking_Standards.pdf?m=636808443466070000

and update cycle parking standards. This, along with improved access for pedestrian connectivity and public transport throughout the city, will assist with reducing single car occupancy and where possible, reduce the need to travel by less sustainable modes of transport.

14.142 The Council intend to review the parking standards and ensure they remain fit for purpose and meet current design requirements for development of residential and non-residential development, in accordance with NPPF paragraph 39. The intention is to include new parking standards within a new Design Guide for Developers. Consultation on new parking standards will be undertaken by the Council in due course, outside of the Local Plan process.

Electric Charging Points

14.143 The NPPF makes provision for the exploitation of sustainable modes of transport through the incorporation of facilities for charging plug in vehicles⁵⁴⁷.

14.144 The Council is committed to improving the network of electric charging points across the city and recognises that the Government's commitment to electric vehicles will require significant improvements to the charging network.

14.145 The policy indicates that the Council will require an appropriate level of electric charging provision to be provided in residential and non-residential development. With regard to residential schemes, developers should make provision for the installation of home charging points on all major residential schemes of 50 dwellings or more. This is considered to be a proportionate threshold which would only affect volume housebuilders who should be able to accommodate this at little cost, particularly as the policy is worded as such that developers will be expected to 'make provision for the installation', rather than require. As such, it is expected that the majority of development proposals across the city, including HGA sites, will be able to deliver this requirement due to the inexpensive nature of home charging apparatus, however the overall viability of a scheme will be taken into consideration.

Public Rights of Way

14.146 It is important that the Definitive Network of Public Rights of Way within the city are protected as this provides permeability through development sites and across the city, whilst also providing alternative sustainable transport routes for travel. This approach accords with the NPPF⁵⁴⁸. However, in exceptional circumstances it may be necessary to divert a Public Right of Way or provide a suitable alternative. All planning applications must be approved in all respects by the Council and must be constructed in accordance with current standards.

Reasonable Alternatives

14.147 No reasonable alternatives considered.

Effective

Deliverable

14.148 The policy will be delivered by through the submission and determination of planning applications. Developers will be expected to design their development proposals in accordance with the requirements of the policy and the Council will assess applications

⁵⁴⁷ NPPF 2012 paragraph 35.

⁵⁴⁸ NPPF 2012 paragraph 75

against the policy requirements. Where necessary, the Council will use planning conditions and legal agreements to ensure that the requirements of the policy are met.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ST3	Development and Transport	Sets out the criteria and supporting information required to assess a planning application	<ul style="list-style-type: none"> When the local network is not capable of supporting the scale of development Significant shortfall in number of electric vehicle parking and charging infrastructure. Consent granted for development on area of safeguarded Definitive Public Right of Way Increase in number of applications approved which do not meet parking standards 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Potential review of the Policy/Plan Review of the Infrastructure Development Plan and Local Transport Plan schemes Review effectiveness of Council's ability to secure S106 monies for highways infrastructure 	<ul style="list-style-type: none"> Traffic flows monitoring (vehicular and cycling) Number of road traffic accidents on local road network Number cycleways/pedestrian routes delivered Travel Plans approved Number of cycle parking/storage spaces approved Number of electric vehicle charging points approved Applications granted contrary to Highways advice 	<ul style="list-style-type: none"> SCC monitoring data Planning applications (and associated Transportation Assessments and Travel Plans) Rights of Way Improvement Plan (ROWIP) Tyne & Wear Traffic & Accident Data Unit (TADU)

Consistent with National Policy

14.149 The policy is consistent with Paragraph 35 of the NPPF which requires development proposals to incorporate facilities for charging plug-in and other ultra-low emission vehicles; Paragraphs 32 and 36, which require developments which would generate significant amounts of movement to be supported by a Travel Plan and a Transport Statement or Transport Assessment; and Paragraph 75 which indicates that planning policies should protect and enhance public rights of way and access.

15. Minerals

SP11 Mineral Extraction

15.1 Minerals are an important resource and are an essential requirement to support economic and sustainable economic growth. The policy sets out the criteria against which planning applications for mineral extraction will be assessed.

SP11 Mineral Extraction

1. Development for mineral extraction must demonstrate the extent, quality, significance and need for the resources to be extracted and must ensure that:
 - i. the natural and historic environment, highway safety and human health is conserved, managed and enhanced as appropriate;
 - ii. residential amenity and human health is protected from issues such as noise, vibration and air quality;
 - iii. workings will not increase the potential of flood risks or surface water flooding;
 - iv. essential infrastructure is protected; and
 - v. the transportation of minerals makes use of sustainable modes of transport wherever possible.
2. Where the above cannot be ensured, the benefits of mineral extraction must outweigh any likely harm and significant justification and mitigation must be provided.

Positively Prepared

Vision and Strategic Priorities

15.2 This policy will deliver the spatial vision and strategic priorities by managing the city's mineral resources ensuring the maintenance of appropriate reserves to meet needs.

15.3 Policy SP11 will help to deliver Strategic Priorities 1, 2, 4, 5, and 12.

Draft Plan Comments

- 15.4 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;
- Highways England generally support the policy, but would support text within the policy for the transportation of minerals by sustainable transport methods, where possible.
 - Historic England support the policy.

How issues have been taken into account at Publication Draft

- The policy was amended to require minerals to be transported by sustainable transport modes where possible.

Publication Draft Comments

- 15.5 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;
- The Coal Authority support the policy (PD1252).
 - The Environment Agency supports the policy with minor amendments (PD218).
 - CPRE North East support the policy but would like reference to establishing liaison committees where appropriate (PD1379).
 - The Mineral Products Association considers that the policy is weak and repetitive. It is considered that need for minerals is already established by evidence base, so should not be a policy requirement (PD4464, PD4361 & PD4456).

How issues have been taken into account prior to Submission

- 15.6 In response to the representations raised by the Environment Agency and the Minerals Products Association (PD218, PD4361 & PD4456), the Council has proposed minor modifications as set out in the Schedule of Modifications (M76). In response to the representations raised by the CPRE North East (PD1379), the Council has proposed minor modifications as set out in the Schedule of Modifications (M77).
- 15.7 With regard to the comments from the Mineral Products Association regarding need, no further modifications are proposed as it is considered that the need for minerals may change during the plan period.

Proposed Modifications to the Publication Draft

- 15.8 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
13.1	<u>Where materials are not available locally, Sunderland will work with neighbouring authorities and other Mineral Planning Authorities to ensure that the continued need for aggregates can be met.</u>	For clarity
13.2	Policy SP11 sets out the approach for dealing with planning applications for mineral extraction, <u>which should be considered in line with other relevant policies in this Plan.</u>	For clarity
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 <u>a landbank of at least 7 years for sand and gravel and at least 10 years for crushed rock. 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. Any site specific allocations will be made through the Allocations and Designations Plan.</u>	To address representations submitted by the Mineral Products Association and the Environment Agency (PD218, PD4361 and PD4456). The Council have also signed a Statement of Common Ground with the Environment Agency (SD8k)
13.3	Potential cumulative impacts must also be considered. <u>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.</u>	To address representations submitted by CPRE (PD1379).

Duty to Cooperate (SD11)

- 15.9 The Council forms part of the North East Aggregates Working Party (NEAWP) which covers a cluster of thirteen Mineral Planning Authorities (MPAs) in the North East of England, covering the sub-regional areas of County Durham, Northumberland, the Tees Valley and Tyne and Wear.
- 15.10 The NEAWP has a role in helping to plan for a steady and adequate supply of minerals through providing data on sales, reserves and planning permissions for aggregate minerals and providing technical advice on the supply and demand for aggregates from their areas. The NEAWP meets regularly to discuss mineral planning matters and prepares a Local Aggregates Assessment (LAA) for the region on an annual basis. The latest LAA for County Durham, Northumberland and Tyne and Wear was published in April 2018 and forms part of the evidence base .
- 15.11 The Council will continue work with other neighbouring authorities on minerals planning through the NEAWP, including the preparation of the LAA and identifying allocations, where necessary through the Allocations and Designations Plan to meet identified needs.

Sustainability Appraisal (2017)

- 15.12 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?													

- 15.13 The SA made the following recommendation for changes to be made to the Draft Plan:

Sustainability Appraisal (2018) (SD5)

- 15.14 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	+	~	~	+	~	~	~	++	++	++	~	+	++	++

- 15.15 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

- 15.16 Minerals are a finite resource that can only be worked where they are found, and therefore it is important to make the best use of them to secure their long-term conservation. However, whilst it is recognised that minerals can only be worked where they can be found, it is also recognised that mineral extraction can have significant impacts upon the local environments in which they are located.
- 15.17 There is currently one operational quarry within Sunderland at Eppleton which is used for the extraction of crushed rock and sand and gravel. Due to the limited number of operational quarries within the region, Eppleton Quarry is a vitally important component in the supply of minerals within the region.

- 15.18 Drawing on information presented within the latest Local Aggregates Assessment (2018 (SD57))⁵⁴⁹, the Council has published its Maintaining Levels of Minerals Supply Topic Paper (2018)(SD58)⁵⁵⁰, which considers the supply and demand for minerals within Sunderland and the wider area. Paragraph 145 of the NPPF requires MPAs ensure that they maintain landbanks of permitted reserves for aggregates. For sand and gravel the reserve is a minimum of 7 years and for crushed rock the reserve is at least 10 years. It is important to note, however, that in the case of Sunderland this landbank applies to the Tyne and Wear sub-region and each of the 5 MPAs making up the sub-region (Gateshead, Newcastle, North Tyneside, South Tyneside and Sunderland) are not required to maintain their own landbanks.
- 15.19 The latest LAA (2018) (SD57) indicates that based on 2016 data, the Tyne and Wear landbanks for sand and gravel is 27 years and 18 years for crushed rock. These permitted reserves are significantly higher than the NPPF requirement and would extend beyond the end of the plan period. Notwithstanding this, the Council recognises that this picture may change in the future and the Plan therefore required a policy against which applications for mineral extraction will be determined. The policy sets a criteria-based policy which seeks to support the extraction of minerals in appropriate locations, where it can be demonstrated that the extent, quality, significance and need for the resources to be extracted can be demonstrated and that the impacts of the development would be acceptable, or can be made so through appropriate mitigation.
- 15.20 Where the criteria within the policy cannot be ensured, planning permission will be refused unless the benefits of mineral extraction outweigh the likely harm. The Council recognise that mineral extraction has the potential to have an adverse impact upon the amenity of residents and therefore the policy seeks to ensure that any impacts are adequately mitigated. The Council also encourages applicants to have early and ongoing engagement with the local community when preparing a proposal to ensure that any concerns are taken into consideration when preparing a scheme. A minor modification has therefore been proposed to the supporting text to encourage early and ongoing engagement with local communities and consideration given to the establishment of liaison committees, where appropriate.
- 15.21 Mineral extraction operations have the potential to increase flood risk elsewhere, particularly where dewatering is proposed. It should therefore be ensured that any workings will not increase the potential flood risks or surface water flooding. Where dewatering is proposed, the Council will require the submission of a water management plan to ensure that this would not increase the risk of flooding and to ensure that water quality is protected.
- 15.22 The policy seeks to protect essential mineral infrastructure. The Council currently has 5 existing mineral infrastructure sites which would be protected under the policy, as shown in Appendix 3 of the Plan and listed within Table 2 (pg7) of the Council's Mineral Safeguarding Areas in Sunderland: MSA Topic Paper (2017)(SD54)⁵⁵¹. This includes one wharf and four

⁵⁴⁹ [https://www.sunderland.gov.uk/media/20899/SD-57-Joint-Local-Aggregates-Assessment-for-County-Durham-Northumberland-and-Tyne-and-Wear-2018-/pdf/SD.57_Joint_Local_Aggregates_Assessment_for_County_Durham_Northumberland_and_Tyne_and_Wear_\(2018\).pdf?m=636803109978430000](https://www.sunderland.gov.uk/media/20899/SD-57-Joint-Local-Aggregates-Assessment-for-County-Durham-Northumberland-and-Tyne-and-Wear-2018-/pdf/SD.57_Joint_Local_Aggregates_Assessment_for_County_Durham_Northumberland_and_Tyne_and_Wear_(2018).pdf?m=636803109978430000)

⁵⁵⁰ [https://www.sunderland.gov.uk/media/20900/SD-58-Maintaining-Levels-of-Minerals-Supply-Topic-Paper-2018-/pdf/SD.58_Maintaining_Levels_of_Minerals_Supply_Topic_Paper_\(2018\).pdf?m=636803110487530000](https://www.sunderland.gov.uk/media/20900/SD-58-Maintaining-Levels-of-Minerals-Supply-Topic-Paper-2018-/pdf/SD.58_Maintaining_Levels_of_Minerals_Supply_Topic_Paper_(2018).pdf?m=636803110487530000)

⁵⁵¹ [https://www.sunderland.gov.uk/media/20896/SD-54-Mineral-Safeguarding-Areas-in-Sunderland-MSA-Topic-Paper-2017-/pdf/SD.54_Mineral_Safeguarding_Areas_in_Sunderland_-_MSA_Topic_Paper_\(2017\).pdf?m=636803107890770000](https://www.sunderland.gov.uk/media/20896/SD-54-Mineral-Safeguarding-Areas-in-Sunderland-MSA-Topic-Paper-2017-/pdf/SD.54_Mineral_Safeguarding_Areas_in_Sunderland_-_MSA_Topic_Paper_(2017).pdf?m=636803107890770000)

concrete batching and coating plants. However, any new minerals infrastructure sites brought forward in the future would also benefit from the same level of protection.

- 15.23 The Council recognise that the extraction of minerals can place significant demands on the transport network, particularly where it is proposed to transport the extracted resources by road. However, it is also recognised that minerals resources can only be worked where they are found and that this is often in isolated rural locations. The policy therefore seeks to ensure that minerals extraction sites utilise sustainable modes of transport wherever possible.
- 15.24 In exceptional circumstances, there may be instances where the criteria set out within the policy cannot be ensured but fully met but that the benefits of the mineral extraction are substantial. In such circumstances, the applicant must submit detailed evidence to demonstrate that the benefits of the proposal would outweigh the harm and provide details of any mitigation proposed that would minimise any adverse impacts.
- 15.25 The policy will facilitate the delivery of appropriate mineral extraction sites within Sunderland to assist in meeting the sub-regional apportionment identified through the North East Local Aggregates Assessment (LAA) (SD57). The Council will continue to work closely with neighbouring authorities through the North East Aggregates Working Party to ensure that an adequate supply of minerals is maintained. Any site allocations required will be made through the emerging Allocations and Designations Plan.

Effective Deliverable

- 15.26 The policy will be delivered through the submission and determination of planning applications. The Council will require the applicant to submit detailed assessments to consider the impact of the development and implement any necessary mitigation measures. Any necessary mitigation will be secured through the use of planning conditions and/or legal agreements. Site specific allocations will be made through the Allocations and Designations Plan, where required.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
SP11	Mineral Extraction	Sets out the criteria that will be used to assess applications for mineral extraction	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy leading to loss of potential mineral resources Increase in flood risk and surface water flooding associated with minerals extraction Loss of supporting 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under-delivery Review of evidence base Review objectives of the policy in partnership with key external stakeholders Potential review of the 	<ul style="list-style-type: none"> Flood risk and surface water flooding Capacity of permitted reserves Air quality 	<ul style="list-style-type: none"> SCC and regional/sub-regional monitoring data Planning applications Minerals operators Local Aggregates Assessment SFRA Air Quality Annual

			minerals infrastructure	Policy/Plan		Status Report <ul style="list-style-type: none"> National CO₂ emissions
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Consistent with National Policy

15.27 The policy is consistent with Paragraphs 142 and 143 of the NPPF as it sets out a policy framework for the extraction of mineral resource of local and national importance and sets out environmental criteria against which planning applications should be assessed so as to ensure that permitted operations do not have unacceptable adverse impacts on the natural and historic environment or human health.

M1 Mineral Safeguarding Area and Infrastructure

15.28 Minerals can only be worked where they are found and it is therefore important that known mineral resources are safeguarded from non-mineral development which could prevent their future extraction. The policy defines Mineral Safeguarding Areas and seeks to protect these from non-mineral extraction unless certain criteria are met.

M1 Mineral Safeguarding Areas and Infrastructure

1. Planning permission will only be granted for incompatible non-mineral development within a Minerals Safeguarding Area, as defined on the Policies Map (Appendix 3), where it is demonstrated that either:
 - i. the mineral is not of economic value or potential value, or does not exist; or
 - ii. that extraction of the mineral would not be physically viable or practicable; or
 - iii. the mineral can be extracted satisfactorily, having regard to Policy SP11, prior to the non-minerals development taking place without adversely affecting the viability or deliverability of the non-minerals development; or
 - iv. the incompatible development is of a temporary nature that can be completed and the site returned to a condition that would not prevent future mineral extraction; or
 - v. material considerations indicate that the need for the development overrides the presumption for mineral safeguarding such that sterilisation of the mineral can be permitted following the exploration of opportunities for prior extraction; or
 - vi. it constitutes development that is exempt from the mineral safeguarding policy (see the list of exempt criteria in Appendix 4).
2. Planning permission will only be granted for development that is incompatible with safeguarded minerals management, transportation or waste management facilities, where it is demonstrated that either:
 - i. it constitutes exempt development as set out in Appendix 4; or
 - ii. replacement Capacity, of the similar type, is available at a suitable alternative site, which is at least equivalent or better than that offered by the facility that it is replacing; or
 - iii. it is for a temporary period and will not compromise its potential in the future for minerals transportation; or
 - iv. material considerations indicate that the need for development overrides the presumption for safeguarding; or
 - v. it has been demonstrated that the Capacity of the facility to be lost, is not required.
3. Planning applications for development within 100m of safeguarded facilities need to demonstrate that impacts, e.g. noise, dust, light and air emissions, that may legitimately arise from the activities taking place at the safeguarded sites would not be experienced to an unacceptable level by occupants of the proposed development and that vehicle access to and from the facility would not be constrained by the development proposed.

Positively Prepared

Vision and Strategic Priorities

15.29 This policy will deliver the spatial vision and strategic priorities by managing the city's resources to ensure the maintenance of appropriate mineral reserves to meet needs.

15.30 Policy M1 will help to deliver Strategic Priority 2 and 12.

Draft Plan Comments

15.31 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Coal Authority and Durham County Council support the policy.

How Issues Have Been Taken into Account at Publication Draft

15.32 No issues raised.

Publication Draft Comments

15.33 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- The Coal Authority supports the policy (PD1253).

How Issues Have Been Taken into account prior to Submission

15.34 No modifications proposed.

Duty to Cooperate (SD11)

15.35 No issues identified. Durham County Council expressed support for the policy.

Sustainability Appraisal (2017)

15.36 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?			?	?									

15.37 The SA made no recommendations for changes to be made to the Draft Plan.

Sustainability Appraisal (2018) (SD5)

15.38 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	+	~	~	-	0	~	++	~	~	~	~	+	~	~

15.39 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

15.40 Minerals are a finite resource that can only be worked where they are found, and therefore it is important to make the best use of them to secure their long-term conservation. It is therefore important that the plan safeguards mineral resources from non-mineral development to ensure that land is not needlessly sterilised. In order to do this, Paragraph

143 of the NPPF required MPAs to define Minerals Safeguarding Areas (MSAs) and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development. The NPPF defines MSAs as an area designated by Minerals Planning Authorities which covers known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development

15.41 In Sunderland, the MSAs identified within the Plan have been developed in accordance with guidance published by the British Geological Survey and by using mineral resource information provided by the British Geological Survey and the Coal Authority. When identifying its MSAs, the Council undertook consultation with statutory consultees, including the Coal Authority and other mineral planning authorities. The approach undertaken is set out within the Council's '*Minerals Safeguarding Areas in Sunderland: MSA Topic Paper*' (2017)(SD54).

15.42 MSAs for existing minerals infrastructure, surface coal, sand and gravel and Magnesian Limestone have been identified and are designated on the proposed Policies Map and within Appendix 3 of the Plan. The policy provides clarity on the circumstances under which non-mineral development would be acceptable within the designated MSAs.

Effective Deliverable

15.43 The policy will be delivered through the submission and determination of planning applications. Proposals for non-mineral development within Mineral Safeguarding Areas will need to be supported by evidence to demonstrate that they satisfy the criteria set out within the policy and would not unduly sterilise land that has the ability to be worked for mineral extraction in the future. Similarly proposals for non-mineral development within 100m of a safeguarded facility must submit evidence to demonstrate that the proposals would not be unduly impacted upon by the existing facility.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M1	Mineral safeguarding areas and infrastructure	Sets out the criteria that will be used to assess applications submitted within mineral safeguarding areas	<ul style="list-style-type: none"> • Significant number of applications approved contrary to policy leading to loss of potential mineral resources • Loss of supporting minerals and waste infrastructure • Applications granted for non-mineral development within Mineral Safeguarding Areas 	<ul style="list-style-type: none"> • Identification of reason for under-performance and/or under-delivery • Review of evidence base • Review objectives of the policy in partnership with key external stakeholders • Potential review of the Policy/Plan 	<ul style="list-style-type: none"> • Safeguarding and sterilisation of mineral resources • Air quality levels • Planning applications granted in close proximity to existing waste management sites • Number of applications granted in MSA for non-mineral development 	<ul style="list-style-type: none"> • SCC and regional/sub-regional monitoring data • Planning applications • Minerals operators • Waste operators • Air Quality Annual Status Report • National CO₂ emissions

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Consistent with National Policy

15.44 The policy is consistent with Paragraph 143 of the NPPF which seeks requires local planning authorities to define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development.

M2 Surface Coal Extraction

15.45 Surface coal extraction is a particularly intrusive method for accessing and utilising it as a resource. The policy therefore seeks to carefully manage applications for surface coal extraction to ensure that any impacts are acceptable.

M2 Surface Coal Extraction

The extraction of surface coal will only be acceptable where:

1. the proposal is environmentally acceptable, or can be made so through agreed mitigation or through planning conditions or legal obligations; or
2. the proposal can provide national, local or community benefits which clearly outweigh the likely adverse impacts to justify the granting of planning permission; and
3. the applicant can satisfy the criteria set out within Policy SP11.

Positively Prepared

Vision and Strategic Priorities

15.46 This policy will deliver the spatial vision by managing the city's resources to ensure the maintenance of appropriate mineral reserves to meet needs

15.47 Policy M2 will help to deliver Strategic Priority 12

Draft Plan Comments

15.48 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Coal Authority request policy is amended to refer to surface coal extraction rather than opencast coal extraction.
- Durham County Council suggests alternative wording to be consistent with NPPF with regard to need and national benefits.

How Issues Have Been Taken into Account at Publication Draft

15.49 The policy was updated to be consistent with Durham County Councils approach and the NPPF. The policy is now refers to surface coal extraction.

Publication Draft Comments

15.50 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- Durham County Council welcomes the changes to the policy (PD1401).
- The Coal Authority supports the policy (PD1255).

How Issues Have Been Taken into account prior to Submission

15.51 No modifications proposed.

Duty to Cooperate (SD11)

15.52 As set out in the Duty to Cooperate Statement, no issues have been identified for this policy. Some minor amendments to the policy have been made to address comments from Durham County Council.

Sustainability Appraisal (2017)

15.53 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?	?			?									

15.54 The SA made the following recommendation for changes to be made to the Draft Plan. Where changes were made as a result of these recommendations, this is outlined in the table below:

SA Objective	Recommendation	SCC Response
SA13: Waste and Natural Resources	In the next iteration of the emerging Sunderland CSDP, Policy WM7 – Open Cast Coal should be amended to require relevant development proposals to satisfy criteria in policy WM5.	Policy requires applicants to satisfy criteria in the equivalent to Policy WM5.

Sustainability Appraisal (2018) (SD5)

15.55 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	+	+	~	+	0	~	~	++	++	++	+	~	++	++

15.56 The SA made no recommendations for changes to be made to the Publication Draft.

Justified

15.57 Within Sunderland there are significant surface coal resources within the western part of the local authority area (as shown in Figure 73). It is therefore necessary that the Council has an appropriate policy framework within the Plan against which any planning applications for surface coal extraction will be assessed.

15.58 Surface coal extraction is

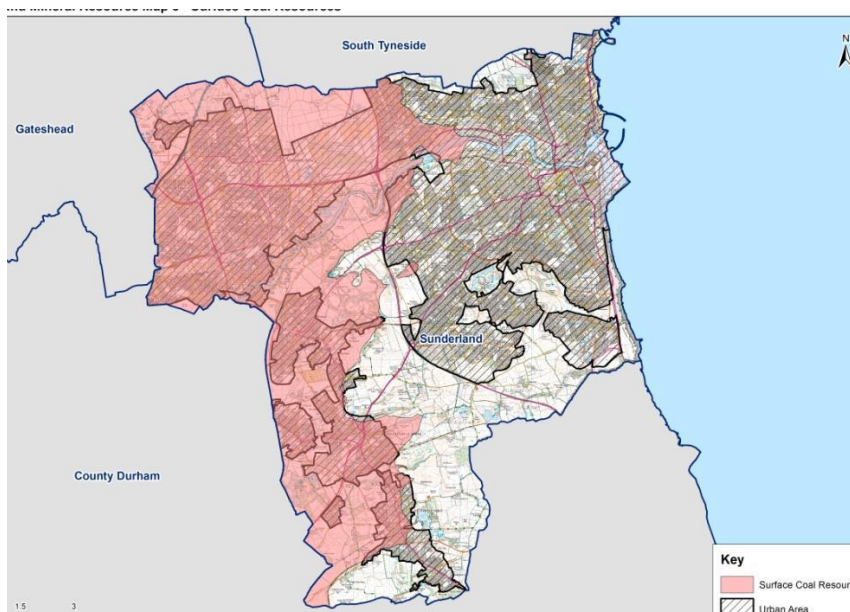


Figure 73 Surface Coal Resources

a particularly intrusive method for accessing and utilising it as a resource. It is therefore important that the Council therefore carefully considers the impacts associated with development proposals for surface coal extraction. The policy sets out the criteria against which any planning applications for surface coal extraction will be assessed. It seeks to ensure that permission is only granted where the proposal is environmentally acceptable, or can be made so through planning conditions or legal obligations or where the benefits would clearly outweigh the harm. The policy also requires any proposals to be consistent with Policy SP11, which covers issues such as amenity.

Effective Deliverable

15.59 The policy will be delivered through the submission and determination of planning applications. Applicants will be expected to submit detailed supporting evidence as part of any planning application for surface coal extraction to clearly demonstrate that the policy requirements have been satisfied.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M2	Surface coal extraction	Sets out the criteria against which applications for surface coal extraction will be assessed	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy leading to loss of potential mineral resources 	<ul style="list-style-type: none"> Identification of reason for under-performance and/or under-delivery Review of evidence base Review objectives of the policy in partnership with key external stakeholders Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Opencast coal applications and permissions 	<ul style="list-style-type: none"> SCC and regional/sub-regional monitoring data Planning applications Minerals operators

Consistent with National Policy

15.60 The policy is consistent with Paragraph 149 which indicates that permission should not be given for the extraction of coal unless the proposal is environmentally acceptable, or can be made to by planning conditions or obligations; or if not, it provides national, local or community benefits which clearly outweigh the likely impacts to justify the grant of planning permission.

M3 Land Instability and Minerals Legacy

15.61 Due to mining heritage of some parts of the authority area, there are areas which have land instability issues. This policy seeks to ensure that any development where land instability as a result of former mine workings

M3 Land Instability and Minerals Legacy

1. Development should give consideration to hazards arising from past coal mining, in particular

land instability and mine gas.

2. Where a development is located within an area with a mining legacy, an applicant will be required to prepare and submit a Coal Mining Risk Assessment and/or carry out site investigations, as necessary.

Positively Prepared

Vision and Strategic Priorities

15.62 This policy will deliver the spatial vision by managing the city's resources to ensure the maintenance of appropriate mineral reserves to meet needs.

15.63 Policy M3 will help to deliver Strategic Priority 12.

Draft Plan Comments

15.64 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;

- Developers and The Coal Authority support the policy.

How Issues Have Been Taken into Account at Publication Draft

15.65 No issues raised.

Publication Draft Comments

15.66 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation;

- The Coal Authority supports the policy (PD1256).
- The Mineral Products Association considers that the policy should be moved as it implies that the policy only relates to mineral development (PD4471).

How issues have been taken into account prior to Submission

15.67 In response to the representations raised by the Minerals Product Association, the Council has proposed minor modifications as set out in the Schedule of Modifications (M33).

Proposed Modifications to the Publication Draft

15.68 The Council proposes the following modifications to:

	Proposed Change	Justification
Policy/ Para/ Figure 5.6	Where a site is affected by land stability issues (<u>including mineral legacy issues as set out in Policy M3</u>), the responsibility for securing a safe development rests with the developer and/or landowner. Affected development must incorporate remediation and management measures.	To cross reference to land stability issues identified in Policy M3, as raised by the Mineral Products Association (PD4471).

Duty to Cooperate (SD11)

15.69 No duty to cooperate issues identified against this policy.

Sustainability Appraisal (2017)

15.70 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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15.71 The SA made no recommendations for changes to be made to the Draft Plan:

Sustainability Appraisal (2018) (SD5)

15.72 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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15.73 The SA made no recommendations for changes to be made to the publication draft.

Justified

15.74 Mineral extraction has been one of the most significant activities shaping the development of the city over the last two centuries. Consequently, there are approximately 290 recorded mine entries listed, potentially resulting in land instability. Whilst land instability is not a complete constraint on development, careful consideration needs to be given to its potential impacts as part of the determination of planning applications in areas with mining legacy. The policy seeks to ensure that land instability and minerals legacy issues, such as mine gas, are taken into consideration as part of planning proposals.

15.75 The Coal Authority has published data which divides the former coalfield areas into two areas; referred to as Development High Risk Areas and Development Low Risk Areas. The High Risk Area (which represents 15% of the coalfield area nationally) is where coal mining risks are present at shallow depth which are likely to affect new development. The Low Risk Area (which represents the remaining 85% of the coalfield area nationally) is where coal mining activity has taken place at sufficient depth that it poses a low risk to new development. The Coal Authority has published an interactive map online showing the risk areas⁵⁵².

15.76 For development sites within the Coal Authority’s most up-to-date ‘Development High Risk Areas’, developers will be required to prepare Coal Mining Risk Assessments and/or carry out investigations to ensure that development would avoid risks. This is consistent with national guidance⁵⁵³. The aim of a Coal Mining Risk Assessment is to identify site specific coal mining risks and set out the proposed mitigation strategy to show that the site can be made safe and stable for the development being proposed.

15.77 The Council recognises that land instability issues are not only as a result of former mineral workings, therefore land instability issues are also addressed through Policy HS1 of the Plan. In order to improve the readability of the Plan, a minor modification has been proposed to the supporting text for Policy HS1 to cross reference to Policy M3.

Effective Deliverable

15.78 The policy will be delivered through the submission and determination of planning applications. Coal Mining Risk Assessments will be required to be undertaken for

⁵⁵² <http://mapapps2.bgs.ac.uk/coalauthority/home.html>.

⁵⁵³ <https://www.gov.uk/guidance/planning-applications-coal-mining-risk-assessments>

applications in high risk areas to ensure that hazards are avoided and appropriate mitigation identified and implemented, where necessary.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M3	Land instability and minerals legacy	Ensure that development takes into account land instability and minerals legacy	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy Significant increase in applications requiring a Coal mining Risk Assessment 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Consider review of the requirements of this and other policies where they prevent effective implementation of this policy Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Planning applications received and granted in Coal Authority high-risk areas and areas of land instability Planning applications requiring a Coal Mining Risk Assessment 	<ul style="list-style-type: none"> SCC monitoring data Planning applications

Consistent with National Policy

15.79 The policy is consistent with Paragraph 143 of the NPPF which requires the Council to set out the environmental criteria against which planning applications will be assessed, including quarry-slope stability, mining subsidence and differential settlement of quarry backfill.

M4 Restoration and Aftercare

15.80 Mineral extraction can have a significant impact upon the landscape and environment. This policy therefore seeks to ensure that an appropriate scheme of restoration is agreed to restore the landscape and environment at the end of extraction works.

M4 Restoration and Aftercare

- Development for minerals extraction and temporary waste management facilities will be granted where satisfactory provision has been made for high standards of restoration and aftercare such that the intended after-use of the site is achieved in a timely manner, including where necessary for its long-term management, including the management, treatment and monitoring of surface water, leachates, ground waste landfill gases, engineering containment systems below and above ground in compliance with the relevant waste permit to deposit waste.
- Restoration plans should be submitted with the planning application which reflect the proposed after-use.

Positively Prepared

Vision and Strategic Priorities

15.81 This policy will deliver the spatial vision by ensuring that the natural environment is protected and enhanced following completion of mineral extraction works.

15.82 Policy M4 will help to deliver Strategic Priority 8

Draft Plan Comments

- 15.83 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation;
- The Coal Authority supports the policy.

How Issues Have Been Taken into Account at Publication Draft

15.84 No issues raised.

Publication Draft Comments

15.85 As set out in the Consultation Statement (SD07), no key issues raised to Policy M4.

How Issues Have Been Taken into account prior to Submission

15.86 As set out in the Consultation Statement (SD07), no key issues raised to Policy M4.

Proposed Modifications to the Publication Draft

15.87 The Council proposes the following modifications to;

Policy/ Para/ Figure	Proposed Change	Justification
13.16	Appendix 5 sets out <u>the issues which should be addressed through restoration</u> What should be included in a Restoration Plan.	To address representations submitted by the Mineral Products Association (PD4477).

Duty to Cooperate (SD11)

15.88 No duty to cooperate issues identified against this policy.

Sustainability Appraisal (2017)

15.89 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
	?	?												

15.90 The SA made no recommendations for changes to be made to the Draft Plan

Sustainability Appraisal (2018) (SD5)

15.91 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
+	+	+	~	+	~	~	++	+	+	~	~	~	+	+

15.92 The SA made no recommendations for changes to be made to the Publication Draft

Justified

- 15.93 Minerals extraction can have a significant impact upon the landscape of an area and therefore it is important that following the completion of the extraction works, the landscape is restored to at least the same quality that it was prior to the minerals development taking place. The policy requires applications for minerals extraction to be supported by a restoration plan to provide details of how the site will be restored following the completion of extraction works. Where possible, the policy seeks to secure enhancements to the quality of the landscape and local environment.
- 15.94 Appendix 5 of the Plan contains detailed information on what issues the Council would expect to be addressed through restoration. As it is recognised that the issues identified in Appendix 5 will not be addressed solely through a restoration plan, but also through other mechanisms such as planning obligations and conditions a minor amendment to the plan has been proposed to make this clear (M78).

Effective

Deliverable

- 15.95 Restoration of mineral extraction sites will be secured through planning obligations and/or legal agreements with developers at the planning application stage.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
M4	Restoration and Aftercare	Sets out the standard of minerals and waste aftercare /restoration that will be required	<ul style="list-style-type: none"> Significant number of applications approved contrary to policy 	<ul style="list-style-type: none"> Identify reasons for the failure to deliver Policy aims Consider review of the requirements of this and other policies where they prevent effective implementation of this policy Potential review of the Policy/Plan 	<ul style="list-style-type: none"> Restoration schemes implemented 	<ul style="list-style-type: none"> SCC monitoring data Planning applications Minerals operators Waste operators

Consistent with National Policy

- 15.96 The policy is consistent with Paragraph 143 of the NPPF which requires the Council to put in place policies to ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place, including for agriculture (safeguarding the long term potential of best and most versatile agricultural land and conserving soil resources), geodiversity, biodiversity, native woodland, the historic environment and recreation.

16 Infrastructure

ID1 Delivering Infrastructure

- 16.1 Policy ID1 is in place to ensure measures are provided to mitigate the impacts of development and to support the delivery of the essential infrastructure proposed in the plan.

ID1 Delivering Infrastructure

1. Development will be expected to provide, or contribute towards the provision of:
 - i. measures to directly mitigate the impacts of the development and make it acceptable in planning terms; and
 - ii. contribute towards the delivery of essential infrastructure identified in the IDP.
2. The timing and prioritisation in the delivery of essential infrastructure will accord with the priority needs established through the IDP.

Positively Prepared

Vision and Strategic Priorities

- 16.2 This policy will deliver the spatial vision and strategic priorities by ensuring that the city has the infrastructure in place to support its future growth and prosperity.
- 16.3 Policy ID1 will help to deliver Strategic Priorities 3, 7, 8, 11 and 13.

Draft Plan Comments

- 16.4 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:
- Developers suggested alternative wording to be in accordance with the NPPF and CIL regulations. Persimmon supports the policy.
 - Highways England supports the policy.

How Issues Have Been Taken into Account at Publication Draft

- Developer's comments have been noted and the policy has been duly amended to accord with the NPPF and CIL Regulations.

Publication Draft Comments

- 16.5 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation:
- Burdon Lane Consortium (PD2779) support the policy with amendments to make clearer that contributions will only be sought where they meet the tests provided in Regulation 122 of the CIL Regulations. Story Homes (PD5386) also state the policy is not consistent with the planning obligations test.
 - Burdon Lane Consortium (PD2779, PD2760) and Story Homes (PD5386) suggested that 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.
 - NHS Sunderland CCG (PD73) suggests the policy may not be effective, as the Infrastructure Delivery Plan and schedule needs updating in terms of Healthcare.

How Issues Have Been Taken into account prior to Submission

- 16.6 In response to the representations raised by Burdon Lane Consortium (PD2779) and Story Homes (PD5386) the Council has proposed an additional modification as set out in the Schedule of Modifications (M79). In response to the representations raised by Burdon Lane

Consortium and Story Homes, the Council does not feel it necessary to make any modifications to point 2 of the policy.

- 16.7 In response to the representations raised by NHS Sunderland CCG, the Council does not feel it necessary to make any modifications as 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. The Council has agreed a Statement of Common Ground (SoCG) with the CCG and the IDP is referred to in more detail within this document.

Proposed Modifications to the Publication Draft

- 16.8 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
14.9	This will be secured either through planning conditions, or where this is not appropriate, by planning obligations or other similar infrastructure tariffs <u>in accordance with the 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.	To address representations submitted by Burdon Lane Consortium (PD2779) and Story Homes (PD5386).

Duty to Cooperate (SD11)

- 16.9 During consultation on the draft Plan, Durham County Council indicated that further information was required regarding the potential impact of the South Sunderland Growth Area (SSGA) allocation upon the local road network in County Durham.
- 16.10 In response to this, meetings were held between Council officers which discussed the potential issues. During these discussions, it was highlighted that 3 of the 4 SSGA sites now had the benefit of planning permission and that Durham County Council had been formally consulted on these applications. It is also noted that during the planning application process for these 3 sites, discussions were held with DCC Officers to agree the highways mitigation works required, including those in County Durham. Contributions towards the delivery of the necessary mitigation has been agreed with the developer through a S106 legal agreement.
- 16.11 Durham County Council's representations (PD1388) to the Plan made clear that that this issue has been satisfactorily resolved. It was agreed that Sunderland Council would continue to liaise with Durham County Council as further proposals come forward for the SSGA.
- 16.12 As part of the South of Tyne discussions, the authorities have continued to work together and shared transport modelling work to gain an understanding of the impacts of each authority's Local Plans. The Councils have agreed to work together to align their transport models and potentially prepare a South of Tyne Infrastructure Delivery Plan.

- 16.13 The Council has held several meetings with the Sunderland Clinical Commissioning Group (CCG) since 2017 to discuss the health provision in the city. The Clinical Commissioning Group would like to ensure that they receive contributions towards health infrastructure.
- 16.14 The Council have advised the CCG that the Plan provides the policy framework to seek contributions towards health infrastructure required as a consequence of development, but that in order for contributions to be sought, a robust evidence base is required.
- 16.15 The CCG have commenced work on collecting the requisite evidence and shared some initial findings with the Council, but further work is required. The Council have committed to continuing to work closely with the CCG on gathering evidence regarding health infrastructure needs and will update the Infrastructure Delivery Plan, as necessary when a robust evidenced need can be demonstrated.
- 16.16 A Statement of Common Ground has been agreed to address the issues raised during Publication draft Consultation (SD8k).

Sustainability Appraisal (2017)

- 16.17 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

- 16.17 The SA made no recommendations to be made to the draft Plan.

Sustainability Appraisal (2018) (SD5)

- 16.18 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
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- 16.19 The SA made no recommendations for changes to be made to the publication draft.

Justified

- 16.20 The Council recognises that to deliver the Plan, sufficient infrastructure is required to support the levels of development proposed. This is in accordance with the NPPF. The development proposals set out in the Plan will put increasing pressure on existing local infrastructures, therefore it is important that deficiencies of existing and new infrastructures are planned and delivered during the plan period to support development proposals, and where this is not possible, measures to mitigate a development's impacts are secured. Policy ID1 pursues these aims.
- 16.21 The Infrastructure Delivery Plan (IDP) (SD59) describes Sunderland's infrastructure requirements, setting down what is required, when it is required, the likely cost, and how it

will be funded. The IDP has been prepared and updated in partnership with key bodies during the preparation of the Plan and it is published as part of the evidence base.

16.22 Infrastructure is defined as 'The basic systems and services, such as transport and power supplies, that a country or organisation uses in order to work effectively' and is usually categorised into physical, social and environmental infrastructure and includes transport, water supply, waste water, energy, telecommunications, waste, health, social care, education, flood risk and coastal change management. As the Planning Act 2008 (as amended by the Localism Act 2011) also defines infrastructure to include sporting and recreational facilities and open spaces, these are included within the IDP (SD.59).

16.23 The IDP is a strategic document and therefore does not detail every infrastructure project being planned in Sunderland; it does however set out the essential infrastructure projects needed to deliver the Plan. As schemes will progress and deliver over the plan period the IDP will be reviewed annually and will act as a live document that will be updated, taking account of changes to Government planning policy and direction; Council infrastructure priorities, bids for funding streams and financial resources; and infrastructure scheme progression.

16.24 The Plan has a number of strategic allocations that are considered essential to the delivery of the Plan:

The Vaux

16.25 The former Vaux Brewery site is brownfield land on the north-western edge of the city centre, and is proposed to be redeveloped as an office-led, mixed-use scheme over the next 20 years. Full planning permission was granted in 24 August 2016 for the first office building (6319 sqm), and outline permission has been granted for the remainder of the site consisting of further office buildings, 201 residential units, hotel, leisure and retail uses. The office building is now under construction.

16.26 Prior to the submission of the application, significant enabling works have taken place to provide the infrastructure necessary to support the development of the site. Much of these works have focussed on the re-alignment of St Mary's Way (which has been renamed St Mary's Boulevard), and improved public realm and landscaping. These enabling works have also been designed to deliver a further phase of the Council's multi-phase Sunderland Strategic Transport Corridor which also incorporates the new Wear Bridge and provides improved strategic access from the Port and the City's key development sites to the A19 and the wider area.

16.27 As part of the approval of the scheme, a Section 106 legal agreement has been entered into to secure the provision of infrastructure and affordable housing in relation to the development including: improvements to Festival Park, contributions towards education and improvements to play facilities.

South Sunderland Growth Area

- 16.28 The South Sunderland Growth Area (SSGA) has the potential to accommodate around 3,000 new dwellings over the next 15-20 years and meet 20% of the city's future housing, providing much needed larger family homes and executive housing within a high quality environment and setting. The SSGA comprises four development sites:
- Chapelgarth
 - Land North of Burdon Lane
 - Cherry Knowle
 - South Ryhope.
- 16.29 Due to the scale of development, there is a need to ensure provision of the supporting infrastructure which is essential to the creation of sustainable communities. This is likely to comprise a new primary school, a local centre, community/cultural facilities, open space, ecology, cycleways and footpaths, public transport and completion of the Ryhope-Doxford Link Road.
- 16.30 An SSGA Infrastructure Delivery Study (IDS) (SD.24) has been prepared to support the preparation of the SSGA Supplementary Planning Document (SPD) (SD.36). This IDS details the requirements, quantum and phasing of social and physical infrastructure associated with the sites in the SSGA, and provides costs for the Ryhope Doxford Link Road. Most infrastructure costs have been apportioned on a per dwelling basis.
- 16.31 Three of the four sites already have full or outline planning consent for residential development and as such all S106s have been agreed to by the relevant developers for the required infrastructure costs. The delivery of the infrastructure is on programme with the two school extensions already having planning permission and a planning application currently being prepared for the Ryhope-Doxford Link Road, to be submitted early 2019. In addition to S106 contributions, monies have been secured via the Growth and Housing fund and matched with Council capital funding. An additional bid is being prepared for a MHCLG forward funding bid for further improvements to road junctions and the road network.

Housing Growth Areas

- 16.32 The Plan allocates 11 Housing Growth Areas. In order to demonstrate these sites are deliverable, the developers of each site have submitted representations as part of the Plan stating that the sites are deliverable in the Plan period and the essential infrastructure required as part of each scheme can and will be delivered.
- 16.33 Development proposals will be expected to contribute towards the delivery of "essential" infrastructure of priority need, as identified in the IDP (Section 7 page 87) (SD59), through planning contributions, where appropriate. Development proposals must meet the planning tests set out in the Community Infrastructure Levy Regulations 2010 (Regulation 122), which are set out in paragraph 14.11 in order to obtain planning contributions towards essential infrastructure schemes.
- 16.34 Whilst house builders feel that the timing and prioritisation of the delivery of schemes (point 2) is too restrictive, the Council considers the annual review of the IDP (SD.59) will offer

sufficient flexibility within the policy to take into consideration updates to essential infrastructure timescales, priority levels and funding streams.

16.35 Where the IDP provides evidence of need and/or deficiencies for infrastructure, the draft Planning Obligations Supplementary Planning Document (SPD) (Section 3, page 7) (SD63) has sought to outline the approach to securing planning contributions for these infrastructures.

Reasonable Alternatives

16.36 No reasonable alternatives were considered.

Effective

Deliverable

16.37 The policy will be delivered through a number of different means. There are a number of different ways that infrastructure requirements can be funded, for instance government and local funding, planning obligations, enterprise zone funding, development tariffs and council assets. A number of organisations would also be involved in the delivery of the policy using a number of different tools, for example, statutory delivery agencies, developers, landowners, local plan documents, council strategies, CPO power, planning applications and duty to co-operate.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ID1	Delivering Infrastructure	Sets out how the Council expects infrastructure to be delivered	<ul style="list-style-type: none"> Development is approved without the necessary infrastructure Essential infrastructure schemes are not delivered/on track to deliver within the plan period 	<ul style="list-style-type: none"> Identify reasons for lack of implementation Possible review of the plan if essential infrastructure cannot be delivered 	<ul style="list-style-type: none"> Essential Infrastructure projects delivered in line with the Infrastructure Delivery Plan (IDP) 	<ul style="list-style-type: none"> SCC Monitoring Planning applications Infrastructure Delivery Plan

Consistent with National Policy

16.38 The NPPF states in para 157 that Local Plans should plan positively for development and infrastructure required in the area. Policy ID1 ensures that this infrastructure is delivered as part of proposals for development.

ID2 Planning Obligation

16.39 Where it is not possible to address any unacceptable impacts through planning conditions, the use of planning obligations will be considered to mitigate and/or compensate these impacts. Policy ID2 sets out what S106 planning obligations will be sought for and associated fees.

ID2 Planning Obligation

1. Section 106 planning obligations will be sought to facilitate the delivery of:
 - i. affordable housing (see Policy H2); and
 - ii. local improvements to mitigate the direct or cumulative impact of development and/or additional facilities and requirements made necessary by the development, in accordance with the Planning Obligations SPD.
2. To facilitate the delivery of the mitigation measures the council will seek maintenance, management, monitoring and such related fees.
3. Where there are site specific viability concerns, development must be accompanied by a Viability Assessment.

Positively Prepared

Vision and Strategic Priorities

16.40 This policy will deliver the spatial vision and strategic priorities by ensuring that the city has the infrastructure in place to support its future growth and prosperity.

16.41 Policy ID2 will help to deliver Strategic Priorities 3, 7,8,11 and 13.

Draft Plan Comments

16.42 As set out in the Consultation Statement (SD07), the following issues were raised during the draft Plan consultation:

- Persimmon and Peel request the policy is aligned to the three tests of planning obligations in the NPPF. Developers consider there is no justification to pay monitoring fees.
- Highways England support the policy.

How Issues Have Been Taken into Account at Publication Draft

- No modifications proposed as a consequence of these representations.

Publication Draft Comments

16.43 As set out in the Consultation Statement (SD07), the following issues were raised during Publication Draft consultation:

- Bellway Homes (PD1986) suggests part 1 of the policy should make clear that it may not apply in all cases. Bellway suggests that the explanatory text regarding CIL in the supporting text should be in the policy. They recommend that the policy should also make clear that each site will be assessed on its merits.
- Burdon Lane Consortium (PD2800), Persimmon Homes (PD4160) and Story Homes (PD5421) suggest the use of planning obligation monitoring fees are not justified, not consistent with the NPPF and not necessary to make applications acceptable in planning terms and suggest reference to this is removed.
- Karbon Homes (PD3391) support the inclusion of point 3 to policy ID2, however they 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.
- NHS Sunderland CCG (PD74) objects to the policy as when viability issues arise, contributions should be apportioned with equal percentages towards the various infrastructures required to mitigate rather than prioritising those with priority needs.

How Issues Have Been Taken into account prior to Submission

- 16.44 The Council has taken into consideration the representations and are not proposing to make any modifications to this policy. In response to the representation raised by Bellway Homes, 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 national policy.
- 16.45 In response to the representation raised by Burdon Lane Consortium, Persimmon Homes and Story Homes the Council considers it appropriate and justified to seek monitoring fees and provides justification in the Infrastructure Compliance Paper.
- 16.46 In response to the representation raised by Karbon Homes 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.
- 16.47 In response to the representation raised by NHS Sunderland CCG the Council considers 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.

Proposed Modifications to the Publication Draft

16.48 The Council proposes the following modifications to:

Policy/ Para/ Figure	Proposed Change	Justification
14.11	Planning obligations must be; <ul style="list-style-type: none"> necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. 	For clarity
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. <u>The Council will, where possible, work with applicants to prevent plan developments stalling.</u>	To address representations submitted by Story Homes and Burdon Lane Consortium (PD2760 and PD5386).

Duty to Cooperate

16.49 The policy raises no Duty to Cooperate issues.

Sustainability Appraisal (2017)

16.50 The following table is a visual summary of the detailed assessment provided in SA Appendix D. This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 3.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15

16.51 The SA made no recommendation for changes to be made to the draft Plan.

Sustainability Appraisal (2018)

16.52 The following table is a visual summary of the detailed assessment provided in the Sustainability Appraisal (SA). This identifies the significance of predicted effects from each draft policy upon each of the 15 SA objectives. The colour coding applied is included in Appendix 4.

SA01	SA02	SA03	SA04	SA05	SA06	SA07	SA08	SA09	SA10	SA11	SA12	SA13	SA14	SA15
~	+	~	+	+	+	+	~	~	+	+	~	~	+	+

16.53 The SA made no recommendation for changes to be made to the publication draft.

Justified

16.54 Policy ID2 sets out a policy framework to, seek planning obligations in accordance with the NPPF (paragraphs 203-206, page 47). The policy seeks planning obligations; maintenance, management, monitoring and other such related fees; and requests a Viability Assessment when specific viability concerns relate to a development proposal. The purpose of the policy is to seek planning contributions for infrastructure where planning conditions cannot mitigate the unacceptable impacts of development.

16.55 The policy provides a hook for the draft Planning Obligations SPD (SD63) which provides detail in regard to the summary of requirements for which planning contributions will be sought, the thresholds for contributions by development type, the justification for requiring contributions, the approach to seeking contributions, how contributions will be calculated and how obligations will be delivered.

16.56 As part of the plan preparation the Council undertook a Whole Plan Viability Assessment (VA) (2017) (SD60) in line with the NPPF and CIL Regulations to ascertain that the cumulative impact of the policies, sites and developer contributions within the Plan would not put the implementation of the plan at serious risk.

16.57 The preparation of the VA involved stakeholder engagement with residential and non-residential developers, including housing associations, landowners, planning professionals and neighbouring authorities.

16.58 The basic viability methodology involved preparing financial development appraisals for the larger sites in the Plan (the South Sunderland Growth Area) and a representative range of other sites, and using these to assess whether development, generally, is viable. The sites were modelled based on discussions with Council officers, the existing available evidence, and the consultants own experience of development. This process ensured that the appraisals were representative of typical development within the Sunderland City Council area over the plan-period. The VA does not try to exactly mirror any particular developer’s business model, it makes a broad assessment of viability in the context of plan-making and the requirements of the NPPF and CIL Regulations.

- 16.59 The VA concluded that in the current market residential development is not put at serious risk by the cumulative impact of the Council's policies and can bear reasonable developer contributions without threatening development. The ability to bear developer contributions is likely to be limited at higher rates of affordable housing. Whilst some non-residential uses are not viable, they are not rendered unviable by the cumulative impact of the Council's policies, rather by the general market conditions. The employment uses (office and industrial), are unlikely to be able to bear additional developer contributions.
- 16.60 The VA is carried out at a point in time during the plan-making process, as such a post consultation/pre-submission viability note was prepared in June 2018 (SD61) to support the publication Plan consultation and considered the changes in National Policy, the changes to the Plan and the comments received during the 2017 consultation. This note concluded that with the additional policy asks in relation to accessible and adaptable dwellings and space standards there should be no adverse impact on the viability and deliverability of individual sites and the overall plan.
- 16.61 As a result of the Viability Assessment the policy allows for flexibility when assessing a development proposal's level of planning obligation, making an allowance for the viability of schemes in point 3 of the policy subject to the submission of a Viability Assessment to the Council. Paragraphs 14.12 to 14.16 and section 13 of the Planning Obligations SPD (SD63) provide further clarity in regard to viability issues and detail the approach to seeking planning contributions that are fair, reasonable and proportionate to the level of development proposed. The Council is committed to delivering development across the city and will work with applicants to prevent planned developments stalling, as stated in paragraph 14.14, in accordance with NPPF paragraph 205.
- 16.62 House builders have suggested that the planning tests set out in the Community Infrastructure Levy Regulations 2010 (Regulation 122) and identified in paragraph 14.11 of the Plan, should be included within policy ID2. Whilst the Council acknowledges that development proposals must meet the planning tests it is considered that the tests are suitably located within paragraph 14.11 and should remain within this paragraph. Moving the tests to policy ID2 would serve no purpose, as it would reiterate the tests already identified within existing policy and statutory documents i.e. National Planning Policy Framework 2012 (paragraph 204), Planning Practice Guidance (Paragraph: 001 Reference ID: 23b-001-20161116) and Community Infrastructure Levy Regulations 2010 (Regulation 122).
- 16.63 The Plan seeks to secure fees for the maintenance, management and monitoring of the delivery of mitigation measures. Objection was received through the Publication Draft Plan consultation in 2018 to the imposition of fees. However, 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:
1. The monitoring fee obligation is shown to be linked to at least one freestanding planning obligation;

2. The decision to approve the obligations are outwardly shown to fully meet the planning tests and CIL Regulation 122(2); and
3. 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).

Reasonable Alternatives

- 16.64 An alternative to the use of planning obligations is to introduce a Community Infrastructure Levy, this option was considered as part of the Whole Plan Viability Assessment 2017 (SD60) to gain an understanding of the scope to introduce CIL. The assessment concluded that based on the viability evidence there is limited scope to pursue CIL.
- 16.65 When assessing the viability of a development proposal and seeking planning contributions for infrastructure, the Council has chosen the approach that gives preference to the needs and priorities within an area, and may not seek contributions towards all infrastructures if it can be demonstrated that the viability of a scheme would be detrimentally affected. It was proposed through consultation of the Publication Draft Plan, that where viability issues arise, planning contributions should be apportioned with equal percentages. The Council considers it appropriate to determine planning contribution apportionment on a case by case basis as differences in needs can vary across Sunderland and needs may change over the lifetime of the Plan.
- 16.66 In addition, the Community Infrastructure Levy Regulations 2010 - Regulation 123, states that the pooling of planning obligations to fund/provide infrastructure, is limited to no more than 5 separate planning obligations. Therefore the approach of equal apportionment of monies to all infrastructure types is unlikely to deliver the essential and desirable infrastructure schemes identified in the IDP, as the monies will be spread thinly and will be capped by the "rule of 5". Thusly, establishing prescriptive apportionments and methodologies to determine priority order within the policy has the potential to stifle its effectiveness and delivery of the plan's objectives. As a result this alternative approach has been discounted.
- 16.67 As part of the Government's consultation on the reforms to the current system of developer contributions⁵⁵⁴ the Government has proposed to lift the pooling restrictions in all areas. However, so that CIL remains an effective mechanism for collecting contributions towards addressing the cumulative impact of development, the Government will ensure measures are in place to incentivise uptake and continued use of the Levy. The Government intend to consult on draft amendment regulations in due course. The changes that come forward in relation to 'pooling' will be considered and detailed within the Council's Planning Obligations Supplementary Planning Document Draft (2018) (SD63). The Council may revisit the scope for CIL if circumstances allow.

⁵⁵⁴ MHCLG: Government response to supporting housing delivery through developer contributions. A summary of consultation responses and the Government's view on the way forward October 2018.

Effective

Deliverable

16.68 The policy will be delivered mainly through the planning application process as well as development tariffs and other local plan documents and strategies. The Planning Obligations SPD (SD.63) will play a major role in informing developers what will be expected from their development.

Monitored

Policy Ref	CSDP Policy	Policy Objective	Trigger for Action	Potential Action or Contingency	Monitoring Indicator	Data Source
ID2	Planning Obligations	Sets out how Section 106 will be used	<ul style="list-style-type: none"> • Legal actions having to be taken against developers for non-payment of S106 monies. • Contributions are not sought in line with the aims set out in the Planning Obligations SPD 	<ul style="list-style-type: none"> • Identify reasons for the failure to deliver Policy aims • Potential review of the Policy/Plan 	<ul style="list-style-type: none"> • Number of applications approved with a S106 (or similar) agreement for developer contributions • Amount (£) of developer contributions negotiated/secured towards different infrastructure types and affordable housing • Amount (£) of developer contributions received towards different infrastructure types and affordable housing • Amount (£) of developer contributions spent on different infrastructure types and affordable housing 	<ul style="list-style-type: none"> • SCC Monitoring • Planning applications • Infrastructure Delivery Plan

Consistent with National Policy

16.69 Viability and deliverability is an important element that runs through the NPPF. Policy ID2 sets out what developers will be expected to contribute towards and how concerns should be addressed.

Appendix 1- Saved UDP Policies

Policy Subject

EC 2	Economic Development (designations - part)
EC5	Mixed Use (designations)
EC8	Tourist Facilities (designations)
EC9	Hotels and Conferences Centres (designations)
EC11	Rural Economy
H3	Land for Housing (designations – part)
H5A	Sunderland Central Area: Housing Allocations (part)
L7	Protection of Recreational and Amenity Land (designations)
H6	Land for Housing (designations)
H13	Private Housing (designations)
S14	Retailing from Other Locations
CF1	Community Facilities (designations)
CF3	Other Public Bodies
CF4	Nursery Education
CF5	Primary and Secondary Education
CF6	Further Education
CF7	University of Sunderland
CF8	Dual Use Facilities
CF9	Health Facilities
CF10	Health and Social Care Buildings
CF11	Social, Religious and Cultural Buildings
CF12	Social, Religious and Cultural Buildings
CF15	Childcare Facilities
L1	Leisure (part)
L2	Indoor Sport
L7	Protection of Recreational and Amenity Land (designations)
L10	Countryside Recreation
L11	Golf Courses
L12	Coast and Riverside
L13	Non-powered watersports
EN2	Energy Production
EN4	Development affecting wind turbines
EN10	White Land
EN15	Reclamation of Sites
B1	Environmental Improvements (designations)
B3	Urban Green Space (designations)
B4	Conservation Areas (designations)
B5	Proposed Conservation Areas (designations – part)
B12	Scheduled Ancient Monuments (designations)
B13	Sites of Local Archaeological Significance (designations)
B14	Sites of Potential Archaeological Importance (designations)
B18	Historic Parks and Gardens (designations)
B19	A User Friendly Environment
CN13	Views of the City (designations)
CN16	Woodlands and Tree Belts (designations)
CN20	SSSI (designations)
CN21	LNR/LWS/LGS/RIGS (designations)
CN23	Wildlife Corridors (designations)
T10	Paths and Multiuser Routes
T11	People with Disabilities and Other Special Needs
T16	Communication Routes
T21	Parking
T23	Public Parking
SA6	New and Mixed Use Sites (part)

SA7 Tourism Facilities
 SA9 Land for Housing (part)
 SA10 Sites in Inner Area
 SA12 Private Housing
 SA16 Education
 SA18 Royal Hospital
 SA20 Community Facilities (part)
 SA22 Cemeteries
 SA23 Regional Recreational and Cultural Facilities (part)
 SA24 Sport and Recreation (part)
 SA26 Sport and Recreation (part)
 SA27 Amenity Open Space (part)
 SA28 Tunstall Hills
 SA29 Urban Country Park
 SA30 Children's Playspace
 SA31 Allotments and Leisure Gardens
 SA32 Access to Riverside
 SA35 New Conservation Areas (part)
 SA36 Historic Park
 SA38 Views
 SA39 Trees and Woodlands (part)
 SA48 Multi-user Routes (part)
 SA49 Strategic Footpaths (part)
 SA52A Sunderland Central Area: New Routes
 SA54 Sites for Development (part)
 SA55A.1 Sunderland Central Area: Comprehensive Development Sites – Holmeside Triangle
 SA55B.1 Sunderland Central Area: Strategic Locations for Change – Sunnyside
 SA55B.2 Sunderland Central Area: Strategic Locations for Change – City Centre West
 SA55B.3 Sunderland Central Area: Strategic Locations for Change – University – Chester Road
 Campus
 SA65 Tourism (part)
 SA67A Sunderland Central Area: Residential Development – Conversion and Change of Use
 SA68 Older Housing Improvement
 SA73 University (part)
 SA74A Sunderland Central Area: Evening Economy Development Within the City Centre
 SA75 Leisure and Recreation
 SA77 Wear Dockyard
 SA80 Environment – Amenity Open Space
 SA84 Street Improvements
 SA86 Vacant Sites (part)
 SA89 City Centre Bus Corridor
 SA90 City Centre Bus Corridors
 SA92 Pedestrian Improvements (part)
 SA93 Footpaths/Multi-user Routes (part)
 SA94 Cyclists (part)
 SA96 Saturday Car Parking (part)
 SA97A Sunderland Central Area: Public Parking
 SA98 Retaining Car Parks (part)
 SA99 On-street Car Parking (part)
 SA100 Dual Use Car Parking
 NA3A.1 Sunderland Central Area: Comprehensive Development Sites – Stadium Park
 NA3A.2 Sunderland Central Area: Comprehensive Development Sites – Sheepfolds
 NA3B.1 Sunderland Central Area: Strategic Locations for Change – Bonnersfield /St Peters University
 Campus
 NA5 Tourism
 NA6 Seafront
 NA7 Land for Housing North (part)
 NA8 Land for Housing North
 NA10 Private Housing North
 NA13 Fulwell Infant School

NA17 Swan Street College
 NA18 Fulwell Junior School
 NA19 Other Community Facilities
 NA20 Regional Recreational Facilities (part)
 NA21 Sport and Recreation
 NA22 Amenity Open Space
 NA23 Children's Playspace
 NA24 Allotments and Leisure Gardens
 NA28 Historic Park
 NA30 Views
 NA31 Tree Planting
 NA32 Local Nature Reserves (part)
 NA34 Park and Ride
 NA35 Multi-user Routes (part)
 NA45 Monkwearmouth: Tourism
 NA46 Monkwearmouth: Housing
 NA47 Monkwearmouth: Environment
 NA48 Monkwearmouth: Environmental Improvements
 WA3 Tourism (part)
 WA6 Private Housing Washington
 WA9 Education (part)
 WA11 Washington Arts Centre
 WA12 Regional Recreational and Cultural Facilities (part)
 WA13 Sport and Recreation (part)
 WA14 Amenity Open Space (part)
 WA15 Children's Playspace
 WA16 Allotments and Leisure Gardens
 WA17 Environmental Identity
 WA20 Views
 WA21 Tree Planting
 WA22 Nature Conservation
 WA23 Springwell Quarry
 WA25 Bus Facilities
 WA28 Perimeter Footpaths
 WA29 Cyclists (part)
 WA32 Nissan Rail Link
 WA34 Washington Town Centre Development Sites
 WA37 Car Parking
 HA3 Tourism and Visitor Facilities
 HA4 Land for Housing (part)
 HA6 Private Housing
 HA8 Educational Facilities (part)
 HA9 Regional Recreational and Cultural Facilities
 HA11 Sport and Recreation
 HA12 New leisure Recreational and Visitor Facilities
 HA13 Children's Playspace
 HA14 Allotments and Leisure Gardens
 HA18 Major Development Site Within the Green Belt
 HA19 Views
 HA20 Trees and Woodland
 HA21 Nature Conservation (part)
 HA24 Bus Facilities
 HA25 Multi-user Routes (part)
 HA26 Strategic Footpaths
 HA27 Cyclists (part)
 HA28 Road Proposals
 HA29 Junction Improvements
 HA31 Houghton Town Centre: Allocations
 HA32 Recreation
 HA33 Built Heritage

Appendix 2 – Evidence List

Submission Documents

Core Strategy and Development Plan 2015-33 Publication Draft	SD.1
Core Strategy and Development Plan 2015-33 Publication Draft Policies Map	SD.2
Schedule of Minor Modifications	SD.3
CSDP Publication - Incorporated Minor Modifications - December 2018	SD.4
Sunderland Publication Draft CSDP Sustainability Appraisal incorporating SEA (2018)	SD.5
Sunderland Publication Draft CSDP Sustainability Appraisal incorporating SEA Non-Technical Summary (2018)	SD.6
Core Strategy and Development Plan Consultation Statement (2018)	SD.7
Core Strategy and Development Plan Report of Representations December 2018	SD.8
<ul style="list-style-type: none">• Report of Representations (A&B)• Report of Representations (C&D)• Report of Representations (E,F&G)• Report of Representations (H,I&J)• Report of Representations (K,L&M)• Report of Representations (N,O,P,Q&R)• Report of Representations (S)• Report of Representations (SCC)• Report of Representations (T,U,V,W&Y)• Unduly Made Representations• Statement of Common Ground	
Schedule of Representations to Publication Draft Plan Core Strategy & Development Plan (2018)	SD.9
Report to Inform Habitats Regulations Assessment (2018)	SD.10
Core Strategy and Development Plan Publication – Duty to co-operate Statement December 2018	SD.11
Sunderland Draft CSDP Sustainability Appraisal incorporating SEA (2017)	SD.12
Core Strategy and Development Plan Monitoring Framework (2018)	SD.13
Equality Analysis for Core Strategy and Development Plan (2018)	SD.14
Local Plan Local Development Scheme 2018-2020	SD.15
Statement of Community Involvement (2015)	SD.16
Sunderland’s Joint Health and Wellbeing Strategy	SD.17
Public Health Evidence in relation to the use of the planning system to control hot food takeaways (2018)	SD.18
Health Impact Assessment (2017)	SD.19
Health Impact Assessment Note (2018)	SD.20
Sunderland Updating the Demographic Evidence (2016)	SD.21
Strategic Housing Land Availability Assessment (2018)	SD.22
<ul style="list-style-type: none">• Strategic Housing Land Availability Assessment Appendix L – Sunderland North Site Assessments (2018)• Strategic Housing Land Availability Assessment Appendix M Urban Core Site Assessments (2018)• Strategic Housing Land Availability Assessment Appendix N Sunderland South Site Assessments (2018)	

<ul style="list-style-type: none"> • Strategic Housing Land Availability Assessment Appendix O Washington Site Assessments (2018) • Strategic Housing Land Availability Assessment Appendix P Coalfield Site Assessments (2018) 	
Sunderland Strategic Housing Market Assessment Update (2017)	SD.23
Sunderland Strategic Housing Market Assessment Addendum (2018)	SD.24
Internal Space Standards (2018)	SD.25
Sunderland Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2017)	SD.26
Sunderland Gypsy and Traveller and Travelling Showperson Accommodation Assessment Addendum (2018)	SD.27
Gypsy's and Traveller's Site Assessment Report (2017)	SD.28
Green Belt Review Stage 1 – Core Strategy Growth Options Stage (2016)	SD.29
Green Belt Assessment Stage 1 Updated and Stage 2 (2017)	SD.30
Stage 3 Green Belt Site Selection Report (2017)	SD.31
Green Belt Assessment 2018 Addendum	SD.32
Review of the Sunderland Green Belt Part 1: Exceptional Circumstances for Releasing Land from the Green Belt	SD.33
Review of the Sunderland Green Belt Part 2: Boundary Assessment and Recommendations (2018)	SD.34
Sunderland Development Frameworks (2018)	SD.35
Draft South Sunderland Growth Area SPD (2017)	SD.36
Sunderland Employment Land Review (2016)	SD.37
<ul style="list-style-type: none"> • Sunderland Employment Land Review (2016) MAPS 	
Employment Land Review: Post EU Referendum Forecasting Analysis (2017)	SD.38
Sunderland Retail Needs Assessment Volume 1 (2016)	SD.39
Sunderland Retail Needs Assessment Volume 2 (2016)	SD.40
Sunderland Retail Needs Assessment Volume 3 (2016)	SD.41
Sunderland Retail Needs Assessment Executive Summary and Recommendations (2016)	SD.42
Sunderland Leisure Needs Study (2016)	SD.43
Sunderland City Council – Playing Pitch Plan (2018)	SD.44
Sunderland City Council – Indoor Sports Facilities Assessment Report (2015)	SD.45
Sunderland Green Infrastructure Strategy (2018)	SD.46
Sunderland Greenspace Audit and Report (2018)	SD.47
2018 Settlement Break Review	SD.48
Sunderland City Council Level 1 – Strategic Flood Risk Assessment (2018)	SD.49
<ul style="list-style-type: none"> • Sunderland City Council Level 1 – Strategic Flood Risk Assessment (2018) Appendix • Sunderland City Council Level 1 – Strategic Flood Risk Assessment (2018) Interactive Maps 	
Sunderland Flood Risk Policy Level 2 Strategic Flood Risk Assessment – Site Screening (2018)	SD.50
Sunderland Local Plan – Initial Assessment of Transport Impacts (2017)	SD.51
Sunderland Local Plan – Assessment of Transport Impacts – Addendum One (April 2018)	SD.52
Sunderland Local Plan – Assessment of Transport Impacts – Addendum Two (April 2018)	SD.53

Mineral Safeguarding Areas in Sunderland - MSA Topic Paper (2017)	SD.54
Sunderland City Council - Waste Arisings and Capacity Requirements (2018)	SD.55
South Tyne & Wear Waste Management Partnership: Joint Municipal Waste Management Strategy (2007)	SD.56
Joint Local Aggregates Assessment for County Durham, Northumberland and Tyne and Wear (2018)	SD.57
Maintaining Levels of Minerals Supply Topic Paper (2018)	SD.58
Core Strategy and Development Plan Infrastructure Delivery Plan Updated December 2018	SD.59
Whole Plan Viability Assessment (with CIL scoping) (2017)	SD.60
Sunderland City Council Post Consultation/Pre-submission Viability Note (2018)	SD.61
Local Plan Education Planning Report (2018)	SD.62
Planning Obligations Supplementary Planning Document Draft (2018)	SD.63
South Tyne & Wear Waste Management Partnership: Joint Municipal Waste Management Strategy Review (2012)	SD.64

Supporting Documents

Core Strategy and Development Plan 2015-2033 Draft (2017)	SP.1
Core Strategy Growth Options Consultation Responses Report (2016)	SP.2
LDF Key Issues & Options Consultation	SP.3
LDF Alternative Approaches Consultation (2009)	SP.4
Local Plan Core Strategy Growth Options Consultation (2016)	SP.5
SLP - Core Strategy and Development Management Policies - Draft Revised Preferred Options (2013)	SP.6
LDF Core Strategy Development Plan Document Preferred Options (2007)	SP.7
LDF Draft Sustainability Appraisal Scoping Report (2009)	SP.8
International Advanced Manufacturing Park Area Action Plan (2017)	SP.9
Sunderland Objectively Assessed Need and Strategic Housing Market Assessment Update (2016)	SP.10
Sunderland Demographic Analysis and Forecasts (2015)	SP.11
Impact Study – International Advanced Manufacturing Park – Topic Paper: Housing (2015)	SP.12
Housing Strategy for Sunderland 2017-2022 (2017)	SP.13
Economic Viability of Affordable Housing Requirements – Study for Sunderland City Council (2014)	SP.14
Interim Student Accommodation Policy (2015)	SP.15
Technical Paper: Optional Standards – Accessible and Adaptable Homes	SP.16
Sunderland City Council – Unauthorised Encampment Policy (2018)	SP.17
Strategic Land Review – Coalfield (2016)	SP.18
Strategic Land Review – North (2016)	SP.19
Strategic Land Review – West (2016)	SP.20
Strategic Land Review – East (2016)	SP.21
Strategic Land Review – Washington (2016)	SP.22
South Sunderland Growth Area Draft Supplementary Planning Document - HRA Appropriate Assessment (2016)	SP.23
South Sunderland Growth Area – Infrastructure Delivery Study (2016)	SP.24

South Sunderland Growth Area Infrastructure Delivery Study – Viability Assessment (2014)	SP.25
SSGA Ecological Assessment, Management Plan & Design Strategy (2014)	SP.26
SHIM Model Testing and Appraisal of LPD Sites Including SSGA (2014)	SP.27
South Sunderland Growth Area Landscape Character Assessment (2015)	SP.28
South Sunderland Growth Area - Draft Supplementary Planning Document Sustainability Appraisal (2016)	SP.29
Sunderland Economic Masterplan	SP.30
Sunderland Transforming Our City – The 3,6,9 Vision	SP.31
Sunderland Economic Update 2012	SP.32
More and Better Jobs: The North East Strategic Economic Plan (2017)	SP.33
Sunderland Central Area Urban Design Strategy (2008)	SP.34
Design and Access Statements SPD (2008)	SP.35
Ashbrooke Conservation Area Character Study (2005)	SP.36
Bishopwearmouth Conservation Area Character Appraisal and Management Plan (2018)	SP.37
Houghton’s Conservation Areas Character Appraisal and Management Strategy (2007)	SP.38
Newbottle Village Conservation Area Character Appraisal and Management Strategy (2009)	SP.39
Roker Park Conservation Area Character Appraisal and Management Strategy (2007)	SP.40
Ryhope Village Conservation Area Character Appraisal and Management Strategy (2010)	SP.41
Silksworth Hall Conservation Area Character Appraisal and Management Strategy (2010)	SP.42
Sunniside Conservation Area Character Appraisal and Management Strategy (2009)	SP.43
The Cedars Conservation Area Character Appraisal and Management Strategy (2008)	SP.44
Washington Village Conservation Area Character Appraisal and Management Strategy (2009)	SP.45
Whitburn Bents Conservation Area Character Appraisal and Management Strategy (2007)	SP.46
Sunderland Landscape Character Assessment (2015)	SP.47
Sunderland Wind and Solar Landscape Sensitivity Assessment (2015)	SP.48
Heritage Coast Management Plan 2018-2025 (Sunderland-Durham-Hartlepool)	SP.49
Local Flood Risk Management Strategy (2016)	SP.50
Sunderland City Council – Preliminary Flood Risk Assessment (2011)	SP.51
Climate Change Action Plan for Sunderland – Progress Report (2010)	SP.52
Keep Tyne and Wear Moving – LTP The Third Local Transport Plan for Tyne and Wear (2011)	SP.53
Ryhope Tunstall Periphery Planning Guidance (1999)	SP.54
Sunderland Strategic Transport Corridor – Adoption of Preferred Route (2005)	SP.55
HMO Article 4 Direction	SP.56
Sunderland Strategic Housing Land Availability Assessment Methodology (2016)	SP.57
Impact Study – International Advanced Manufacturing Park – Topic Paper	SP.58

Update 2016 - Housing	
Sunniside Planning and Design Framework (2008)	SP.59
Sunderland Cultural Strategy	SP.60
Minster Quarter Masterplan Supplementary Planning Document (2017)	SP.61
Schedule of Representations to Draft Plan Core Strategy and Development Plan (January 2018)	SP.62
Local Plan Sustainability Appraisal Scoping Report Consultation (2015)	SP.63
Draft Sunderland Strategic Transport Corridor Commercial Links: Outline Business Case (2016)	SP.64
County Archaeology Officer Email: Significance of Archaeology at Lambton D Pit Wooden Waggonway	SP.65
Metro Futures: The combined future of Metro and local rail in the North East	SP.66
North East Rail Statement: Our Aspirations for rail improvements and investments over the next 15 years	SP.67
NECA Transport Manifesto	SP.68
Development Control Guidelines - Parking Standards	SP.69
HRA North Sunderland	SP.70

Appendix 3

2017 SA Scoring System

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

Appendix 4

2018 SA Scoring System

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

01 Appedicies

Appendix 1 List of saved UDP policies

Policy/ Para/ Figure	Proposed Change	Justification
Appendix 1	Replaced list of Saved UDP Policies (see Appendix 1)	For clarity

Appendix 2 Core Strategy and Development Plan Evidence

Appendix 2

- Sport England does not consider that the Council has an up-to-date Built Sports Facilities Strategy (PD4462).
- Natural England considers that the Sustainability Appraisal should take account of HRA mitigation. Suggest using monitoring indicators which take account of the effects of the plan, rather than wider issues (PD2787 & PD2808).
- & H Properties consider that a HRA for the whole city is undertaken (PD4250).

- A resident objects to the inclusion of Site 87 as deliverable housing site in the SHLAA (PD290).
- Two residents consider that Site 464B should be included as a firm proposal in the SHLAA and not a windfall site (PD282 & PD283).
- The Environment Agency would like the SFRA Level 1 and SFRA Level 2 documents to be submitted as part of the evidence base and support the Green Infrastructure Strategy (PD206).
- A resident indicated that the Schedule of Representations was not published in time as part of the evidence base (PD3239). Miller Homes support the inclusion of land at South Bents in the SHLAA (PD888).

The Council has an up-to-date Built Sports Facility which forms part of the submitted evidence base. The Council has submitted the SFRA Level 1 and Level 2 as part of the evidence base.

Policy/ Para/ Figure	Proposed Change	Justification
Appendix 2	Replace list detailing evidence base (see Appendix 1)	To reflect the list of submission documents

Appendix 3 Appendix SA

- Mineral Products Association considers that Appendix 3 would benefit from identifying the existing mineral infrastructure sites (PD4473).

In response to the representations raised by the Minerals Product Association, the Council has proposed minor modifications as set out in the Schedule of Modifications (M79 and M80).

Policy/ Para/ Figure	Proposed Change	Justification
Appendix 3	Replaced map, adding more detailed key (see Appendix 1)	To address representations submitted by the Mineral Products Association (PD4288).

Appendix 4 SA 2018

Appendix 5

- Mineral Products Association considers that the scale of information goes beyond that required for restoration (PD4477).

In response to the representations raised by the Minerals Product Association (PD4477), the Council has proposed minor modifications as set out in the Schedule of Modifications (M74).

In response to the representations raised by Natural England, the Council has updated the Monitoring Framework.

Policy/ Para/ Figure	Proposed Change	Justification
Appendix 5	Appendix 5 – <u>Restoration Plan Issues to be addressed through restoration</u> Restoration Plan A restoration Plan should include: The	To address representations submitted by the Mineral Products Association (PD4477).

	following issues should be addressed through restoration:	
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Glossary

The following main issues were identified by representations to the Glossary:

- Sunderland NHS CCG would like a definition for local services to be included (PD71).
- Developer Mr. Delaney would like a definition for executive homes and self-build dwellings to be included (PD37).
- The Environment Agency suggested a spelling correction for Magnesian Limestone (PD218)

In response to the representations raised by Sunderland NHS CCG (PD71), the Council has proposed minor modifications as set out in the Schedule of Modifications (M87).

In response to the representations raised by Mr. Delaney, the Council has proposed minor modifications as set out in the Schedule of Modifications (M90).

In response to the representations raised by the Environment Agency (PD218), the Council has proposed minor modifications as set out in the Schedule of Modifications (M88).

Policy/ Para/ Figure	Proposed Change	Justification
Glossary	Best and most versatile agricultural land is that <u>land</u> which falls into Grades 1, 2 and 3a of the Agricultural Land Classification. See Agricultural Land Classification.	For clarity
Glossary	<u>Bluespace</u> <u>Bluespace refers to visible water within open spaces and includes beaches, rivers, streams, ponds, lakes, canals and fountains.</u>	To address representations submitted by the Environment Agency (PD212 and PD213). The Council have also signed a Statement of Common Ground (<i>Insert ref</i>).
Glossary	<u>Development</u> <u>The carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land.</u>	For clarity
Glossary	...subject to the outcome of the environmental assessments that are currently being undertaken).)	Typographical error
Glossary	<u>Family Housing</u> <u>Homes that contain three or more bedrooms and have access to outdoor space.</u>	For clarity
Glossary	<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>	To address representations submitted by NHS Sunderland Clinical Commissioning Group (PD71 and PD72).
Glossary	Magnesium <u>Magnesian</u> Limestone Aquifer	To address representations submitted by the Environment Agency (PD218). The Council have also signed a Statement of Common Ground (<i>Insert ref</i>).
Glossary	...(compiled and maintained by the Secretary of State for <u>Digital</u> , Culture,	For clarity

	Media and Sport).	
Glossary	<u>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.</u>	To address representations submitted by Ray Delaney (PD37).

