

Sunderland City Council Response to Matters, Issues & Questions

Matter 6 – Employment Land Supply, Employment Policies, Town Centres/Culture, Leisure and Tourism

1. Components of Employment Land Supply

1.1 Will the up to date employment land position and the components of the employment land supply that will meet the employment land requirements of 95 hectares be clearly shown in the Plan (base date 31 March 2019) shown in the plan.

The Council has proposed a modification to the Plan (AM40) which sets out an updated employment land supply position with a base of 31 March 2019.

2. Primary, Key and Other Employment Areas

2.1 Are Policies EG1, EG2 and EG3 consistent with paragraph 22 of the Framework and the long-term protection of sites allocated or safeguarded for employment use?

It is considered that Policies EG1, EG2 and EG3 (SD.1; pgs. 65-67) are consistent with paragraph 22, of the National Planning Policy Framework (2012) (NPPF)¹. In demonstrating this it should be noted that policies EG1, EG2 and EG3, set out various levels of protection and flexibility depending on their site classification (Primary Employment Areas, Key Employment Areas and Other Employment Areas). The level of protection given is summarised in the table below.

Levels of Protection and Flexibility Attributed to Employment Sites

Policy	Level of Protection
EG1: Primary Employment Areas	These sites are vital to the long-term success of the city, located in the strongest demand areas. Primary Employment Areas are fully protected from non-employment uses.
EG2: Key Employment Areas	These sites are considered necessary to meeting the future employment land need. Nevertheless, due to their second-tier status, a flexible approach has been taken to site release, set out in part 2 of Policy EG2.
EG3: Other Employment Sites	Sites are permitted to change use where there are significant regeneration benefits or it is demonstrated that there is no reasonable prospect of the land being used for employment uses.

¹NPPF (2012) para 22, sets out that planning policies should avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

Given the table above, the CSDP therefore provides a balanced approach, between protection and allowing for appropriate flexibility, taking into consideration that the supply of employment land is becoming particularly tight. Further justification is provided within the Compliance Statement (SD.66; paras. 9.1-9.73; pgs. 291-309).

2.2 Are the criteria within policies EG1, EG2 and EG3 relating to the protection of employment sites and land and the introduction of alternative uses positively prepared and effective?

The Council considers the criteria within Policies EG1, EG2 and EG3 to be positively prepared. The permission of alternative uses within employment areas is restricted to certain uses and sizes ensuring they are truly ancillary to the principle function of the land for B use class development and complimentary to the integrity of the overall employment area. These policy criteria ensure that employment areas perform efficiently and deliver the economic growth projected over the Plan period, helping deliver the CSDP Spatial Vision and Strategic Priorities 1, 2 and 5, as is expanded on in the Compliance Statement (SD.66; pgs. 291, 300 & 307).

The Policy criteria relating to the protection of employment sites and land and the introduction of alternative uses are considered effective. The Policies will be delivered through the submission and determination of planning applications. The permitted alternative use classes are specified and the thresholds for floorspace and number of units are measurable to ensure the Policies will be effective and deliverable through the development management process. The supply of employment land will be carefully monitored through the Authority Monitoring Report (AMR) and updates to the Employment Land Review (SD.37).

2.4 Are all the Key Employment Areas allocated and safeguarded by Policy EG2 worthy of protection for employment use?

The Council considers all sites set out as Key Employment Areas worthy of protection. As set out within the Compliance Statement (SD.66; paras. 9.48-9.55; pgs. 303-305) the Council has identified a tightening of employment supply against employment needs. Therefore, it is considered that all Key Employment Areas (KEAs), are considered worthy of protection. These are all long-term established employment areas, which support existing employment uses.

3. Employment Development

3.1 Do the policies of the LP provide sufficient support for employment development within the area (Policies EG4 and EG5 in particular)

The economic growth policies, set out within the CSDP (including EG4 and EG5) (SD.1; pgs. 67-68) provide support for employment development across the City.

Policy EG4 seeks to support the delivery of employment land balanced against the need to reinforce Key Employment Areas (KEAs) and Primary Employment Areas (PEAs) as the principal locations of B Use Class development. Whilst setting out the principle that the established designated employment areas are the most appropriate location for new employment development, the policy provides a positive framework

for assessing employment development where there are no suitable sites available within designated employment areas. This further supports the growth of the local economy and allows the CSDP to be responsive to changing market conditions and where site availability is a challenge.

Policy EG5 sets out a positive framework for office (B1a) development, recognising a number of employment areas to be prioritised for office led developments, which is consistent with Paragraphs 19 and 23 of the NPPF.

4. Main Town Centre Uses

4.1 Is the requirement for 45,400 m² of comparison floorspace within the Plan period justified?

The requirement for 45,400 sqm of comparison floorspace over the Plan-period is recommended in paragraphs 7.12-7.28 of the Sunderland Retail Needs Assessment (SD.39; pgs. 108-114). The Council's justification for following this recommendation is set out in paragraphs 10.33-10.38 of the Compliance Statement (SD.66; pgs. 327-329).

4.2 Does Policy VC1 provide sufficient protection to existing town centres, taking into account the requirements for additional comparison floorspace in the Sub-Areas?

The requirements and spatial distribution set out in Policy SP9 aim to redistribute a proportion of comparison floorspace to the Coalfield and Washington. The Town Centres of each of these Sub-areas are Houghton and Washington, respectively. These two Centres represent the only Town Centres in the Plan-area and are important administrative centres within their respective areas. Policy VC1 sets out that the City Centre and Town Centres will be the principal locations for major retail, leisure, entertainment, cultural facilities and services, and that the development of Main Town Centre uses outside of existing centres will be expected to follow the sequential assessment approach set out in paragraph 24 of the NPPF (2012). The Council considers that this Policy is consistent with paragraph 23 of the NPPF (2012) and offers sufficient protection to the existing Town Centres whilst taking into account the requirements set out in Policy SP9.

4.3 Is there any need to make specific allocations for retail development in this Plan taking into account the provisions of the UDP, the intention to make allocations in the A & D Plan and the fact that floorspace needs are primarily towards the end of the Plan period?

The Council does not consider it necessary to make site specific allocations for retail development in this Plan taking into account the provisions of the UDP, the intention to make allocations in the A&D Plan and the fact that the floorspace needs are primarily towards the end of the Plan period. Further justification is provided within the Compliance Statement (SD.66; paras. 10.66-10.99; pgs. 333-341).

4.4 Are the thresholds for retail impact assessments within Policy VC2 justified?

The Council considers the thresholds for retail impact assessments in Policy VC2 to be justified. The thresholds are consistent with the recommendations of paragraphs 9.19-9.30 of the Sunderland Retail Needs Assessment (SD.39; pgs. 149-153). These recommendations are made with acknowledgement to paragraph 016 of the PPG (Ensuring the Vitality of Town Centres, reference ID: 2b-016-20140306), which advises that when setting such thresholds, consideration should be given to the scale of the proposal; viability and vitality; cumulative effects; vulnerability of Centres; policy framework; and planned investment. Further justification for using the recommended thresholds for each sub-area is set out in paragraphs 10.55-10.57 of the Compliance Statement (SD.66; pg. 331).

4.5 Do the provisions of Policy VC3 provide for both protection and flexibility for retail and non-retail uses within primary and secondary frontages?

Policy VC3 designates Primary Shopping Areas, Primary Frontages and Secondary Frontages and sets out what uses are acceptable within each of these areas. Primary Shopping Areas should be the focus for new retail development and the development of A1 retail use will be supported within Primary Frontages. The two policy mechanisms in parts 3 and 4 of the Policy are designed to ensure both protection and flexibility. Part 3 of the Policy (as proposed in paragraph 51 of EX1.008) sets out the thresholds for non-A1 use in Primary Frontages above which further non-A1 development will normally be resisted. This mechanism aims to protect and support Centres' viability and vitality by ensuring that Primary Frontages remain predominantly in A1 use. Part 4 of the Policy (as proposed in paragraph 51 of EX1.008) ensures flexibility by allowing non-A1 development above the thresholds set out in Part 3, provided it can be demonstrated that premises have been vacant and marketed unsuccessfully for A1 uses for a period of least 24 months. This flexibility also aims to protect and support Centres' viability and vitality by ensuring that vacant units are avoided while also aiming to occupy vacant units with A1 uses wherever possible.

4.6 Are the provisions of Policy VC4 (hot food takeaways) and Policy SP7 justified, particularly Section 2 of Policy VC4 in relation to healthier communities?

The Council considers that the provisions of Policy VC4 and SP7 are justified. Section 1 of Policy VC4 seeks to ensure a diversification of uses within designated centres in order to protect their vitality and viability, which is consistent with the NPPF. Section 2 of Policy VC4 and Policy SP7 recognise the need to support healthy lifestyle choices within the city and therefore seeks to support this by restricting the provision of new hot food takeaways in the areas with the highest childhood obesity rates. Detailed justification for the policy, particularly around Section 2 of Policy VC4 is set out within the Compliance Paper (SD.66; paras. 10.111-10.136; pgs. 343-350) and the Public Health Evidence in Relation to the use of the Planning System to Control Hot Food Takeaways (SD.18).

5. Culture, Leisure and Tourism

5.1 *Will Policy VC6 be effective in supporting all forms of leisure development?*

Paragraph 10.198 of the Compliance Statement (SD.66, pg. 361) sets out that the delivery of Policy VC6 will be through the determination of planning applications. The specific leisure proposals identified in the Policy will be delivered collaboratively with relevant partners, including the MAC Trust, the FA and Sport England. Leisure development more generally will be delivered on a case by case basis through the determination of planning applications as they are received. The Policy generally supports the development of cultural, leisure and tourism proposals, and it is considered that this method of delivery will be effective way of facilitating all forms of leisure development. This is consistent with the recommendations of paragraphs 5.1-5.5 of the Sunderland Leisure Needs Study (SD.43, pgs. 46-47) which identifies that there is no requirement to pro-actively plan for any form of leisure development within the city over the Plan period.