

Sunderland City Council
Schedule of Main Modifications
May 2019

The Publication Draft Core Strategy and Development Plan (CSDP) must meet the requirements of section 20(5) (a-c) of the 2004 Act, associated regulations and the requirements of the National Planning Policy Framework ('the Framework'). Under section 20(7C) of the 2004 Act, the Inspector has recommended main modifications to the plan that are deemed necessary to make the CSDP sound and legally compliant.

There are two types of modifications;

- **Main Modifications** - are those that materially affect the submitted Plan, which are required to ensure that the plan is sound and legally compliant.
- **Additional Modifications** - are those where they will not impact upon the intent or interpretation of the Plan or go to the heart of whether the plan is 'sound' or not. The minor changes outlined are changes such as typographical errors and factual updates.

The Council is proposing Main Modifications to the Publication Draft CSDP (July 2018) which are contained in this schedule. These modifications include recommendations from the appointed Inspector and are modifications that materially affect the submitted Plan and are required to ensure that the plan is sound and legally compliant. The Council has prepared a separate schedule of Additional Modifications.

The modifications are set out in plan order. Where it has not been possible to show information (such as tables, diagrams and maps) within the table, these are provided in Appendix 1. This is a living document that will be updated during the examination process.

The following format has been used to denote modifications:

- Underlined text = new text suggested
- ~~Strikethrough text~~ = text proposed for removal

Modification Reference	Stage modification proposed	Major or Additional	Page Ref (Publication Draft 2018)	Policy/Para/Figure (in publication/in incorporating mods)	Proposed Change	Justification/Council response												
MM1	Inspector comment (paragraph 17) and Submission	Main	31-32	Policy SP1	SP1 <u>Spatial Development Strategy</u> 2. iii. emphasising the need to develop in sustainable locations in close proximity to transport hubs. Higher densities close to transport hubs will be encouraged.	In response to Inspector's preliminary comments (paragraph 17). Typographical error												
MM2	Inspector comment (paragraph 17)	Main	33	Paragraph 4.17	With regards to the objectively assessed need for employment land, the ELR identifies a need for between 95 and 115 hectares of employment land (for B Use Classes) over the Plan period. The Plan identifies a number of Primary and Key Employment Sites throughout the city to meet this requirement. <u>The distribution of available employment land is set out in the table below.</u> <table border="1"> <thead> <tr> <th>Sub Area</th> <th>Percentage of Available Land Supply (%)</th> </tr> </thead> <tbody> <tr> <td>Washington</td> <td>42</td> </tr> <tr> <td>Coalfield</td> <td>20</td> </tr> <tr> <td>Sunderland South</td> <td>32</td> </tr> <tr> <td>Sunderland North</td> <td>6</td> </tr> </tbody> </table>	Sub Area	Percentage of Available Land Supply (%)	Washington	42	Coalfield	20	Sunderland South	32	Sunderland North	6	In response to Inspector's preliminary comments (paragraph 17), detail regarding distribution of employment added to text.		
Sub Area	Percentage of Available Land Supply (%)																	
Washington	42																	
Coalfield	20																	
Sunderland South	32																	
Sunderland North	6																	
MM3	Inspector comment (paragraph 17)	Main	34	Paragraph 4.23	The <u>housing distribution is such that SHLAA demonstrates that the majority of the identified housing land supply is located in South Sunderland (47% (41%)) and the Coalfield (28% (29%)) sub areas.</u> In part, this has been as a consequence of the lack of available housing sites in the northern part of the city, which can be largely attributed to the presence of the Tyne and Wear Green Belt, which places a heavy constraint on the supply of suitable development land. Subsequently, locations such as Washington and Springwell have experienced limited development over a number of years. <u>The broad distribution of housing is set out in Figure 13 below.</u> <u>Figure 13: Broad Housing Distribution*</u> <table border="1"> <thead> <tr> <th>Sub-area</th> <th>Broad Housing Distribution %</th> </tr> </thead> <tbody> <tr> <td>North Sunderland</td> <td>12%</td> </tr> <tr> <td>Urban Core</td> <td>7%</td> </tr> <tr> <td>South Sunderland</td> <td>41%</td> </tr> <tr> <td>Coalfield</td> <td>29%</td> </tr> <tr> <td>Washington</td> <td>11%</td> </tr> </tbody> </table> *Table includes HGA's and excludes small sites and demolitions	Sub-area	Broad Housing Distribution %	North Sunderland	12%	Urban Core	7%	South Sunderland	41%	Coalfield	29%	Washington	11%	In response to Inspector's preliminary comments (paragraph 17), detail regarding distribution of housing land.
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MM4	Inspector comment (paragraph 20)	Main	34	New paragraph following para 4.29	4.30 Furthermore, and in line with the NPPF, the Council has identified 'Safeguarded Land' in order to provide a degree of permanence to the Green Belt boundaries in the longer term, so that they should be capable of enduring beyond the Plan period.	In response to Inspector's preliminary comments (paragraph 20).						
MM5	Submission	Main	37	Policy SS1	1. improve linkages to St Mary's Way Boulevard and the rest of the Urban Core....	For clarity						
MM6	Inspector comment (Appendix 2 – Minor Queries and Typos)	Main	38	Policy SS2	2. address impacts and make provision or contributions towards education provision and healthcare; and 3. enhance access to local facilities and services, and	In response to Inspector's preliminary comments (Appendix 2 – Minor Queries and Typos).						
MM7	Inspector comment (paragraph 54)	Main	40	Policy SS2: HGA3	Insert additional bullet: viii. Seek improvements to the permissive footpath between Stone Cellar Road and A195 at Follingsby.	In response to Inspector's preliminary comment (paragraph 54).						
MM8	Submission and Inspector comment (paragraph 54)	Main	41	Policy SS2: HGA6	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 in accordance with Sport England's playing field policy exception E1 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 several residents. In response to Inspector's preliminary comments (paragraph 54). The Council has also signed a Statement of Common Ground with Sport England (EX1.011).						
MM9	Inspector comment (paragraph 19)	Main	41-42	Following Policy SS2	<table border="1"> <tr> <td><u>HGA1 South West Springwell</u></td> <td>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and represents a logical rounding-off of the village, with the creation of a new durable Green Belt boundary.</td> </tr> <tr> <td><u>HGA2 East Springwell</u></td> <td>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and will be defined by a new, durable Green Belt boundary to the south.</td> </tr> <tr> <td><u>HGA3 North of High Usworth</u></td> <td>The impact on Green Belt purpose (moderate) and from</td> </tr> </table>	<u>HGA1 South West Springwell</u>	The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and represents a logical rounding-off of the village, with the creation of a new durable Green Belt boundary.	<u>HGA2 East Springwell</u>	The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and will be defined by a new, durable Green Belt boundary to the south.	<u>HGA3 North of High Usworth</u>	The impact on Green Belt purpose (moderate) and from	In response to Inspector's preliminary comments (paragraph 19).
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MM10	Inspector comment (paragraph 20)	Main	34	Paragraph 4.44	<p>Reference to this paragraph now follows para 4.29.</p> <p>4.44 When revising Green Belt boundaries, the NPPF indicates that the Local Plan should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan period. In addition, where necessary, the Local Planning Authority should identify 'Safeguarded Land' between the urban area and the Green Belt in order to meet the likely longer-term development needs.</p>	In response to Inspector's preliminary comments (paragraph 20).								

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MM11	Submission	Main	44	Policy SS4: HGA8	<p>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 <u>Grade II Listed Buildings</u>, <u>Grade II* Listed Fulwell Mill</u> and <u>Grade II Listed Lime Kilns</u>;</p> <p>-----</p> <p>An additional bullet point to be added to the end of the policy:</p> <p><u>Development of the site can only take place subject to an up-to-date Playing Pitch needs assessment, prepared in consultation with Sport England, identifying the pitches as being surplus to requirement in accordance with Sport England's playing field policy exception E1 or where the pitches can be re-provided in accordance with Sport England's playing field policy exception E4.</u></p>	<p>To address representations submitted by Historic England (PD95). The Council has also signed a Statement of Common Ground (SD.8k).</p> <p>To address representations submitted by Sport England (PD4499). The Council has also signed a Statement of Common Ground with Sport England (EX1.011).</p>				
MM12	Inspector comment (paragraph 19)	Main	44-45	Following Policy SS4	<table border="1"> <tr> <td>HGA7 North Hylton</td> <td><u>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and will be defined by a new, durable Green Belt boundary to the south, west and east.</u></td> </tr> <tr> <td>HGA8 Fulwell</td> <td><u>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable (subject to the sports pitches being proven to be surplus to requirements) and provides an urban extension along the A1018, with the creation of a new durable Green Belt boundary to the west and north.</u></td> </tr> </table>	HGA7 North Hylton	<u>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and will be defined by a new, durable Green Belt boundary to the south, west and east.</u>	HGA8 Fulwell	<u>The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable (subject to the sports pitches being proven to be surplus to requirements) and provides an urban extension along the A1018, with the creation of a new durable Green Belt boundary to the west and north.</u>	In response to Inspector's preliminary comments (paragraph 19).
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MM13	Submission and Inspector comment (paragraph 54)	Main	46	Policy SS6	<p>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.</p> <p>Development should deliver:</p> <ol style="list-style-type: none"> 1. approximately 3000 new homes; 2. 10% affordable housing; 	In response to Inspector's preliminary comments (paragraph 54).				

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					<p>3. a new primary school and extensions to two existing schools;</p> <p>4. 3. a local centre within Land North of Burdon Lane which will comprise:</p> <p>(i) a range of appropriate A1, A3, A4, D1 and D2 uses;</p> <p>(ii) a new primary school which will also serve as a community hub;</p> <p>(iii) wheeled Sports Area;</p> <p>(iv) formal play space;</p> <p>(v) Multi User Games Area;</p> <p>(vi) 3G pitch;</p> <p>(vii) appropriate parking facilities and served by bus service;</p> <p>5. community/cultural facilities</p> <p>4. extensions to two existing primary schools in close proximity to SSGA;</p> <p>6. 5. large expanses of public open space;</p> <p>6. allotments</p> <p>7. woodlands; suitable ecological mitigation in line with HRA requirements;</p> <p>8. cycleways and footpaths; and</p> <p>9. new and improved public transport services and infrastructure; and</p> <p>10. the completion of the Ryhope-Doxford Link Road.</p> <p>All development should be in accordance with the SSGA SPD.</p>	
MM14	Inspector comment (paragraph 22)	Main	48	Policy SP6	1. the Open Countryside and Settlement Breaks will be protected from inappropriate unacceptable development;	In response to Inspector's preliminary comments (paragraph 22).
MM15	Submission	Main	50	Policy 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 including Newbottle Village Conservation Area, and Listed Buildings in the locality.	To address representations submitted by Historic England (PD97). The Council have also signed a Statement of Common Ground (SD.8k).
MM16	Inspector comment (paragraph 19)	Main	50	Following Policy SS7	HGA9 Penshaw The impact on Green Belt purpose (moderate) and from site constraints can be minimised and suitably mitigated for. The site is deliverable and provides an urban extension along the A183, with the creation of a new	In response to Inspector's preliminary comments. (paragraph 19).

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MM17	Submission	Main	54	Policy 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).									
MM18	Inspector comment (paragraph 33)	Main	58	Paragraph 6.5	To ensure that the council maintains a continuous five-year supply of deliverable housing sites, this Plan requires a minimum of 745 new dwellings per year. <u>In terms of the five-year land supply a 5% buffer has been applied to the housing requirement once any over/undersupply has been accounted for. The application of the buffer assists to bring forward housing from later in the plan period where necessary and to increase choice in the market for housing. Should there be a record of persistent (over previous three years) under delivery of housing, this buffer will be increase to 20%. This Plan will be reviewed by 2024 and, where appropriate, will reassess the strategy.</u>	In response to Inspector's preliminary comments. (paragraph 33).									
MM19	Inspector comment (paragraph 28)	Main	58	After paragraph 6.7	<p>Figure 34: Housing Supply Breakdown</p> <table border="1"> <thead> <tr> <th rowspan="2">Source</th> <th colspan="2">Dwelling numbers</th> </tr> <tr> <th>2015/16-2018/19</th> <th>2019/20-2032/33</th> </tr> </thead> <tbody> <tr> <td>Completions</td> <td>3,180</td> <td></td> </tr> </tbody> </table>	Source	Dwelling numbers		2015/16-2018/19	2019/20-2032/33	Completions	3,180		In response to Inspector's preliminary comments. (paragraph 28).	
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MM20	Inspector comment (paragraph 34)	Main	58	Paragraph 6.8	However, historically the net number of empty properties returned to use has been minimal and as such no allowance has been made for empty properties within the supply. Further details will be set out within the Council's <u>Housing Implementation Strategy (HIS)</u> , which sets out the Council's approach to facilitating and managing delivery of new housing to ensure a continuous five-year land supply is maintained and the overall OAN are met.	In response to Inspector's preliminary comments. (paragraph 34).																														
MM21	Inspector comment (paragraph 32)	Main	58	Figure 34	Replace Figure 34 (see Appendix 1)	In response to Inspector's preliminary comments (paragraph 32).																														
MM22	Inspector comment (paragraph 40)	Main	59	Policy H1	iii. achieving an appropriate density for its location which takes into account the character of the area and the level of accessibility; and	In response to Inspector's preliminary comments (paragraph 40).																														
MM23	Inspector comment (paragraphs 36, 37 and 38)	Main	60	Policy H2	All developments of more than 10 dwellings or more, or on sites of 0.5ha or more should provide at least 15% affordable housing. This affordable housing should: <ul style="list-style-type: none"> 1. be provided on-site in order to help achieve mixed and balanced communities. However, <u>exceptionally off-site</u> 	In response to Inspector's preliminary comments (paragraphs 36, 37 and 38).																														

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					<p>provision or a financial contribution made in lieu may be considered acceptable where it can be justified;</p> <p>2. when part of a mixed housing scheme should be grouped in small clusters throughout the site; and</p> <p>3. be indistinguishable in terms of appearance from the market housing-; and</p> <p>4. <u>reflect the latest available evidence with regards the tenure split and size of dwellings.</u></p>	
MM24	Inspector comment (paragraph 46)	Main	61	Policy H4	<p>1. The needs of Travelling Showpeople will be met by:</p> <p>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. <u>Development of allocated Travelling Showpeople Sites should:</u></p> <p><u>Station Road North</u></p> <ul style="list-style-type: none"> • <u>accommodate at least 3 plots;</u> • <u>provide a suitable vehicular access to the site from the industrial estate to the south</u> • <u>be laid out as such to avoid living accommodation on the land to the northern part of the site.</u> • <u>utilise the northern part of the site for storage.</u> • <u>provide adequate screening to the existing allotments to the west of the site.</u> • <u>not impact upon the pedestrian footpath to the north and east of the site</u> <p><u>Market Place Industrial Estate</u></p> <ul style="list-style-type: none"> • <u>accommodate at least 12 plots</u> • <u>provide a suitable vehicular access to the site from Gravel Walks</u> • <u>give consideration to additional vehicle access from Balfour Street for cars only.</u> • <u>provide adequate screening to the east of the site to protect the amenities of residents living on the site</u> • <u>provide an adequate screening/buffer to the south of the site adjoining Gravel Walks, to</u> 	In response to Inspector's preliminary comments (paragraph 46).

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					<p><u>reduce any noise impact on existing residents of Gravel Walks/Lake Road.</u></p> <ul style="list-style-type: none"> • <u>provide adequate screening of the site to protect the amenities of residents living on the site.</u> • <u>ensure that fairground equipment is stored and maintained to the eastern most part of the site to avoid any noise impact on residential properties to the west and south of the site; and</u> • <u>give consideration to the location of fairground equipment within individual plots, in order to protect the amenity of both residents living on the site and residents in nearby residential properties.</u> <p><u>In order to ensure adequate provision is made for Travelling Showpeople within the City the council has allocated two sites within the Coalfield sub-area. Site criteria is in place to ensure a suitable form of development can be provided and any impacts on the amenity of existing and proposed residents are mitigated.</u></p> <p>ii. Identifying broad locations at Station Road/Pearsons Industrial Estate</p>	
MM25	Inspector comment (paragraph 43)	Main	63	Policy H6	<p>4. <u>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</u></p> <p>5. <u>the proposal would not result in an over concentration of HMOs within the locality; and</u></p> <p>6. <u>the accommodation provides a good standard of living space and amenity for occupiers of the HMO.</u></p>	In response to Inspector's preliminary comments (paragraph 43).
MM26	Inspector comment (paragraph 51)	Main	72	Policy VC3	<p>3. 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.</p> <p>4. Where proposals for non-A1 use within primary shopping areas cannot demonstrate that they have satisfied the above, they will be normally be resisted if they would result in:</p>	In response to Inspector's preliminary comments (paragraph 51).

Modification Reference	Stage modification proposed	Major or Additional	Page Ref (Publication Draft 2018)	Policy/Para/Figure (in publication/in incorporating mods)	Proposed Change	Justification/Council response
					<p>i. more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre being in non-A1 retail use; or</p> <p>ii. more than 25% of each Primary Frontage thoroughfare in Washington Town Centre being in non-A1 retail use; or</p> <p>iii. more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use.</p> <p>3. <u>Proposals for non-A1 use within primary shopping areas will normally be resisted if they would result in:</u></p> <p><u>i. more than 15% of each Primary Frontage thoroughfare in Sunderland City Centre being in non-A1 retail use; or</u></p> <p><u>ii. more than 25% of each Primary Frontage thoroughfare in Washington Town Centre being in non-A1 retail use; or</u></p> <p><u>iii. more than 40% of each Primary Frontage thoroughfare in Houghton Town Centre being in non-A1 retail use.</u></p> <p>4. <u>Where proposals for non-A1 use within Primary Frontages will exceed the above thresholds, they will only be considered acceptable where it can be demonstrated that the premises have been vacant and marketed unsuccessfully for A1 uses for a period of least 24 months.</u></p>	
MM27	Inspector comment (Appendix 2 – Minor Queries and Typos)	Main	76	Policy VC6	vii. the temporary and meanwhile use of vacant buildings...	To address Inspector's preliminary comments (Appendix 2 – Minor Queries and Typos).
MM28	Inspector comment (paragraph 41)	Main	77	Policy BH1	14. meet national spaces standards as a minimum (for residential). <u>To allow for a period of transition, these standards will be introduced one year from the date of adoption of this plan.</u>	In response to Inspector's preliminary comments (paragraph 41).
MM29	Inspector comment (paragraph 61)	Main	78	Paragraph 9.5	Masterplans or development frameworks should be prepared for large scale development, in particular those which will be phased. <u>For clarity, large-scale development within the context of this policy is considered to be that which exceeds 250 dwellings or 5 hectares.</u> This will ensure that development creates high quality sustainable places based on sound urban design principles...	In response to Inspector's preliminary comments (paragraph 61).
MM30	Inspector comment (paragraph 42)	Main	78	Policy BH2	Sustainable design and construction should be integral to development. Where possible major development (<u>as defined in the 2019 Framework</u>) should...	In response to Inspector's preliminary comments (paragraph 42).
MM31	Submission	Main	82	Policy BH8	1. Development affecting heritage assets (both designated and non-designated) or their settings should recognise and respond to their significance and	To address representations submitted by Historic England (PD108). The Council has also signed a Statement of Common Ground (SD.8k).

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					<p>demonstrate how they conserve and enhance the significance and character of the asset(s), including <u>any contribution made by its setting</u> where appropriate.</p> <p>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.</p>	To address representations submitted by several consultees (PD2574, PD4113, PD5329).
MM32	Submission	Main	83	Policy BH9	1. Development which adversely affects the 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 wholly exceptional circumstances exist that satisfy the requirements of the NPPF.	To address representations submitted by Historic England (PD109). The Council has also signed a Statement of Common Ground (SD.8k).
MM33	Submission	Main	85	Policy NE1	<p>NE1 Green and Blue Infrastructure</p> <p>1. To maintain and improve the Green Infrastructure Network through enhancing, creating and managing multifunctional greenspaces and bluespaces that are well connected to each other and the wider countryside, development should:</p> <ul style="list-style-type: none"> 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; <p>and</p> <ul style="list-style-type: none"> 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; <u>and</u> ix. <u>protect, enhance and restore watercourses, ponds, lakes and water dependent habitats.</u> 	To address representations submitted by the Environment Agency (PD213). The Council has also signed a Statement of Common Ground (SD.8k).

Modification Reference	Stage modification proposed	Major or Additional	Page Ref (Publication Draft 2018)	Policy/Para/Figure (in publication/in incorporating mods)	Proposed Change	Justification/Council response
					<p>2. Development that would sever or significantly reduce green infrastructure will not normally be permitted unless the need for and benefits of the development demonstrably outweigh any adverse impacts and suitable mitigation and/or compensation is provided.</p>	
MM34	Inspector comment (paragraph 62) and Submission	Main	86	Policy 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 <u>have an impact on the integrity of European designated sites that cannot be avoided or adequately mitigated will not be permitted other than in exceptional circumstances. These circumstances will only apply where there are:</u></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 the reasons for the development, including the lack of an alternative solution, clearly outweigh the nature conservation value of the site and the national policy to safeguard the national network of such sites;</u></p>	<p>Section 3 altered in response to Inspector's preliminary comments (paragraph 62).</p> <p>Other alterations to policy to reflect the duty to cooperate with Gateshead and STMBC and Statement of Common Ground with Natural England (SD.8k). Also, in response to representations from the Church Commissioners of England (PD1795 and PD5249), Northumbrian Water (PD2656), Taylor Wimpey (PD3784), and Hellens (PD5080).</p>

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					<p>4. <u>development</u> that would adversely affect a Local Wildlife Site or Local Geological Site, either directly or indirectly, will demonstrate that:</p> <ul style="list-style-type: none"> i. there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the intrinsic value of the site; <p>5. <u>development</u> that would adversely affect the ecological, recreational and/or educational value of a Local Nature Reserve that will demonstrate:</p> <ul style="list-style-type: none"> i. that there are no reasonable alternatives; and ii. the case for development clearly outweighs the need to safeguard the ecological, recreational and/or educational value of the site; <p>6. proposals <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>	
MM35	Inspector comment (paragraph 62)	Main	87	Paragraph 10.10	<p><u>Sites of Special Scientific Interest (SSSIs) are of national significance and receive statutory protection. Local Wildlife Sites (LWSs) are of regional or sub regional importance and are designated by a Local Wildlife Sites Partnership. They are non-statutory and rely on the planning system for their protection. Local Nature reserves (LNRs) are designated by the Council and receive statutory protection.</u></p>	In response to Inspector's preliminary comments (paragraph 62).
MM36	Inspector comment (paragraph 63)	Main	88	Policy NE3	<p>To conserve significant trees, woodlands and hedgerows, development should:</p> <p>1. only be permitted where it can clearly demonstrate that development cannot reasonably be located elsewhere;</p> <p><u>21. 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:</u></p> <ul style="list-style-type: none"> i. avoid harm; ii. provide unequivocal evidence of need and benefits of proposed development; 	In response to Inspector's preliminary comments (paragraph 63).

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					<p>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;</p> <p>32. 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;</p> <p>43. 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</p> <p>54. 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.</p>	
MM37	Inspector comment (paragraph 72)	Main	88	Policy NE4	3. requiring all major residential development to provide: <ul style="list-style-type: none"> i. a minimum of 0.9ha per 1000 bedspaces of amenity useable greenspace on site, unless... 	In response to Inspector's preliminary comments (paragraph 72).
MM38	Submission	Main	90	Policy NE6	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.	To address representations made by Ray Delaney (PD34).
MM39	Inspector comment (paragraph 23)	Main	92	Policy NE8	<p>7iii. 8. With regards residential, the creation <u>and extension</u> of a residential curtilage, <u>provided that it</u> will not have a harmful impact on the character of the countryside.</p> <p>9. Limited infilling...</p> <p>10. 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.</p>	In response to the Inspector's preliminary comments (paragraph 23), and to amend a typographical error.
MM40	Inspector comment (paragraphs 21 and 64)	Main	93	Paragraph 10.43	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 principle. <u>Valued landscapes in Sunderland equate to those areas highlighted in the city's Landscape Character Assessment (LCA) for 'landscape protection',</u>	In response to Inspector's preliminary comments (paragraphs 21 and 64).

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					which are also identified as areas of higher landscape value. These are shown on the Map in Appendix 3.	
MM41	Submission	Main	99	Policy WWE5	4. Where the development involves the disposal of trade effluent a foul Water Management Plan / drainage assessment will be required to demonstrate how the disposal of foul water is undertaken following the disposal hierarchy. This should include a trade effluent consent if connected to the sewerage system. Trade effluent is any liquid produced in the course of any trade or industry including car washes.	To address representations submitted by the Environment Agency (PD217). The Council has also signed a Statement of Common Ground (SD.8k).
MM42	Inspector comment (paragraph 56)	Main	101	Policy WWE8	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 (HWRC) and commercial facilities required for the management of LACW or other waste streams, unless it can be demonstrated that: <ol style="list-style-type: none"> 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. <u>Applications for non-waste development in close proximity to existing or proposed waste facilities will not normally be supported where they would adversely impact upon the use of the site for waste management operations, unless the criteria above can be satisfied.</u>	In response to Inspector's preliminary comments (paragraph 56).
MM43	Submission	Main	105	Policy SP10	iv. Improvements to the mainline and key junctions on the A19, including providing access to the IAMP;	To reflect discussions with Highways England (PD4804, PD4840, PD4841, PD4842, PD4843, PD4845, PD4846, PD4849 and PD4850).
MM44	Inspector comment (paragraph 57)	Main	111	Policy SP11	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.	In response to Inspector's preliminary comments (paragraph 57).
MM45	Inspector comment (paragraphs 76 and 77)	Main	118	Monitoring Section, following paragraph 14.16	Implementation and Monitoring <u>14.17 The successful implementation of the Local Plan relies on a coherent, robust and flexible monitoring process which will enable the Council to respond to changing circumstances. The principal mechanism for monitoring the performance of the Local Plan will be</u>	In response to Inspector's preliminary comments (paragraphs 76 and 77).

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					<p>through the Authority's Monitoring Report (AMR). The <u>Localism Act 2011 requires Local Authorities to prepare AMRs to assess the implementation of the Local Development Scheme (LDS), and the extent to which policies and proposals set out in local development documents are being successfully implemented.</u></p> <p>14.18 <u>The Implementation & Monitoring Framework is set out in the CSDP Monitoring Framework (2018). The Framework is structured according to the composition of the CSDP, enabling for easy and direct comparison with the policies, proposals and overall objectives. The implementation of the Local Plan will be monitored through a schedule of Monitoring Indicators on an annual basis. These will provide an accurate indication of the performance of the Local Plan against the objectives and the Local Plan policies. Through the monitoring process, the AMR will identify any issues that need to be rectified.</u></p> <p>14.19 <u>There are several key triggers identified throughout the CSDP which would lead to a partial or full review of the Local Plan. Further set out in the CSDP Monitoring Framework (2018) are specific triggers for each Policy. This approach ensures that appropriate and proportionate triggers and actions can be set for each Policy and Monitoring Indicator due to a failure to meet key targets.</u></p>	

Appendix 1

Figure 34 Housing Trajectory (MM21)

