

Sunderland Core Strategy and Development Plan (2015- 2033)
Matters 10 and 11: Infrastructure and Delivery/Monitoring and Implementation

Representor number: 1175997



**Homes
England**

Matter 10 – Infrastructure and Delivery

Issue 1: The evidence base underpinning the LP

1.1 Does the Plan and Whole Plan Viability Study make realistic assumptions about land values, sales values, profit and development costs?

No comments.

Issue 2: Transport Network

2.1 Are the transport routes identified in Policy SP10 necessary to support sustainable development?

No comments.

2.2 Will the routes support the use of sustainable modes of transport?

No comments.

Issue 3: Policies ID1 and ID2

3.1 Will Policy ID1 and the allocation policies of the Plan ensure that necessary infrastructure is delivered and in a timely fashion?

No comments.

3.2 Is Section 2 of Policy ID1 and the link to the IDP too prescriptive?

No comments.

3.3 Are the policies consistent with the legal and policy tests for planning obligations?

No comments.

3.4 Are the policies clear as to the effects of viability on the ability to make infrastructure and other contributions/obligations?

No comments.

3.5 Is the requirement within Policy ID2 to seek monitoring fees justified?

No comments.

Issue 4: Greenspace

4.1 Will Criteria 2 and 3 of Policy NE4 deliver sufficient greenspace alongside new development so as to create well-designed neighbourhoods which support healthy lifestyles and well-being?

No Comments.

Issue 5: Pooling of Contributions

5.1 Are there likely to be any implications arising from the pooling restrictions within the Community Infrastructure Levy (CIL) Regulations for the delivery of infrastructure going forward?

No comments.

Issue 6: IDP

6.1 Is the IDP clear as to what infrastructure projects are critical to the delivery of the LP, when infrastructure will be delivered, sources of funding and who is responsible for delivery?

No comments.

Matter 11 - Monitoring and Implementation

Issue 1: Monitoring Framework

1.1 Is the Plan clear in indicating how the Plan's policies and proposals will be monitored?

The Monitoring Framework presents a robust methodology for reviewing the performance of the Plan's policies. However, as the plan has limited flexibility allow steps to be taken to stimulate housing supply without having to resort to a full or partial Local Plan review. As such, additional flexibilities should be included to ensure that the Plan stands the best possible chance of maintaining delivery in varying economic conditions.

1.2 Will the indicators in the Monitoring Framework be effective in monitoring the success of the Plan's policies and proposals?

With particular regard to the monitoring of housing delivery against targets, although it is recognised that the submitted Plan is to be examined against the requirements of the National Planning Policy Framework (March 2012) under the transitional arrangements outlined in the revised National Planning Policy Framework (February 2019), once adopted the revised Framework will be a material consideration in the determination of applications. Therefore, it may be prudent to include reference to the Housing Delivery Test at paragraph 6.9 of the submitted plan as a means of future proofing the monitoring mechanisms which could lead to a Plan review being required.

Issue 2: Review of the Plan

2.1 Is the LP clear as to when a review or partial review of the LP would be triggered due to a failure to meet key targets, for example for those relating to the delivery of housing?

Paragraph 5.1 of the Core Strategy and Development Plan Monitoring Framework (SD.13) clearly states:

"As part of the monitoring process it is vital that if a policy is failing to deliver then the desired outcomes can be identified; these are the 'triggers' which will result in the need for action or contingency. Effectively this is so that, if it is identified through the monitoring process that a policy is not being implemented in line with the objective, then there is a 'Plan B' brought into place to try and remedy the failure or shortfall in delivery, implementation or effectiveness".

However, the submitted Plan and Monitoring Framework do not include any significant built in flexibilities to allow the release of sites which are capable of having a substantial impact upon housing delivery numbers. In order to proactively respond to any failure to deliver the required number of homes to meet objectively assessed needs the only options available short of a full or partial Plan review would involve negotiation with developers in relation to housing mix and planning obligations.

As discussed in detail in Homes England's responses to Matter 2, to ensure that a selection of sites are available to respond to changing circumstances, a more flexible and responsive approach would be to allocate the Land East of Washington and instead safeguard an appropriate selection of HGA sites to meet longer term development needs. Alternatively, the HGA sites could be removed from the Green Belt and held in reserve with policies stipulating the circumstances in which they can come forward. This approach would provide maximum flexibility in ensuring housing needs are met during, and beyond, the plan period.

Should this approach be taken forward, the inclusion of wording specifying the criteria before which reserve sites can be brought forward for development should be inserted at the end of Policy SP8 after the site typology list.

Issue 3: Supplementary Planning Guidance

3.1 Is the Plan clear on the SPD that will be prepared to provide guidance on the implementation of the Plan?

No comments.

Issue 4: Saved Policies

4.1 Is the Plan clear on which UDP policies are to be saved or superseded?

The use of language at Paragraph 1.6 of the submitted Plan leaves some confusion in relation to the status of UDP policies after the submitted Plan is adopted. The term 'superseded' is used to describe the status of the Sunderland Unitary Development Plan (UDP) 1998 and UDP Alteration No. 2 (2007). However, as a number of UDP policies are to be saved until the Allocations and Designations Plan is adopted, these documents will not be superseded; rather a number of the policies within the UDP will be superseded.

To avoid any confusion as to the status of the Sunderland Unitary Development Plan (UDP) 1998 and UDP Alteration No. 2 (2007), the use of the word superseded at paragraph 1.6 should be amended to refer to policies as opposed to the documents themselves. In addition, the status of UDP policies could be clarified by amending Appendix 1 to include a full list of UDP policies with those which have been superseded on adoption of the submitted plan struck through and clearly labelled as 'superseded'.